

## Privacy Statement

This notice applies to Individuals not covered by our specific Privacy Notice for Candidates which is published here and whose processes are outlined more concisely here: <http://www.agencybell.co.uk/your-data/>

So it is applicable to anyone else we come in contact with while carrying out our business, be it clients, individuals who refer candidates to us, suppliers, employees or users of our website.

Agency Bell Ltd (or "We", because that's less wordy) take protecting and respecting your privacy very seriously.

The General Data Protection Regulation (GDPR) (or "Regulation (EU) 2016/679" to its friends) is a regulation which replaces the old Data Protection Regulation (the dweeby "Directive 95/46/EC"). The aim of the regulation is to harmonise data protection legislation across the EU, better protecting individual privacy and providing a strict framework within which commercial organisations can legally operate.

For the purposes of data protection legislation in force from time to time, the data controller is **Agency Bell Ltd, Station House, Station Approach, East Horsley, Leatherhead, KT24 6QX**

Direct contact details are set out in the section headed Contact at the end of this notice.

## Who we are and what we do

We are a recruitment agency (and a pretty good one, too), and a recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). To find candidates jobs, we collect personal data of different groups of people, including;

- Prospective and placed candidates for permanent or temporary roles;
- Prospective and live client contacts;
- Supplier contacts to support our services;
- Employees, consultants, temporary workers;

The reason we collect information about candidates, clients, employees and users of our website is to carry out our core business and related activities.

## Information we collect about you

We may collect the following types of personal information:

- Contact details: information that allows us to identify and contact you directly such as your name, address, email address and telephone number and work and/or home address.

- Identification information: such as passport and/or other identification details.
- Details of your work history: this may include positions, roles, responsibilities.
- Personal history and information: This includes hobbies, interests, marital status, family details, dietary requirements.
- Details of your performance: when working with or for us in relation to any project or work we are engaged in.
- Your usage of the IT systems we make available to visitors on our premises, such as our client internet facilities.
- Details of the correspondence you enter into with us. This includes emails, letters, SMS, MMS.
- How you use our website: we collect information about the pages you visit and how you use them: When you visit our site we will automatically collect the following information: Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information if applicable, browser type and version, operating system and platform; information about your visit, including the URL through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

## Special categories of personal information

We don't generally collect, store and use any of the following "special categories" of more sensitive personal information about you:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- information about your trade union memberships;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information;
- biometric information, for example fingerprints, retina scans.
- Also, we do not generally collect, store and use any criminal records history relating to you, our AML checks may reveal such information (unless you're a candidate, in which case it's a legal requirement).

## Sources we collect your personal information from

We will collect personal information from a number of sources. These include the following:

**Directly from you:** when you indicate that you may wish to attend an event, complete forms we provide to you, enter our competitions and promotions, make a claim, make a complaint, provide AML information to us contact us by phone, email or communicate with us directly in some other way.

**Our website:** provides us with information about how you use it and the devices that you use to connect to our website.

**Our providers of background information:** which may include credit reference agencies, AML check provider, Companies House, LinkedIn and other web platforms.

**Your employer or the organisation you work for:** they may provide us with your name, position contact details and background information about you.

**Information we obtain from other sources.**

As recruiters we also collect some information from other places, such as LinkedIn, corporate websites, job board websites, online CV libraries, business cards, and personal recommendations.

We will include a link to our privacy notice in our email footers, on our website and on our registration form (we issue this to candidates during the registration process). We'll tell you that we hold personal data about you and what we plan to use it for.

We sometimes work closely with third parties including, business partners, sub-contractors in technical, professional, administrative, payment and other services, advertising networks, analytics providers, search information providers, credit reference agencies, or professional advisors. As a result we might receive information about you from them for the purposes of our recruitment services and extra support services.

**Purposes of the processing and the legal basis for the processing**

Generally, our legal basis for processing personal data is our **legitimate business interests**, but we also rely on **contract, legal obligation** and **consent** for specific uses of data.

We will rely on contract when there's, well, a contract.

We will rely on legal obligation if we are legally required to hold information on you.

Then we will sometimes rely on consent for particular uses of your data and you will be asked for your express consent, if legally required.

We use the information we collect in the following ways:

Purpose	Personal Information used	Lawful basis
For identity checks	All the personal information we collect	We have a legitimate interest in knowing your identity; We may have a legal obligation to undertake identification too
To enter into and perform contracts	All the personal information we collect	To enter into and perform contracts with either yourself or the organisation you represent
To deal with your queries and/or complaints	All the personal information we collect	We have a legitimate interest to improve the services we provide

To maintain and improve our services	All the personal information we collect	We have a legitimate interest to improve the services we provide
Data analytics and statistical research to help us improve our online services	How you use our website	We have a legitimate interest to improve the services we provide
Security of our IT systems	All the personal information we collect	We have a legitimate interest in the security of our IT systems
Staff training	All the personal information we collect	We have a legitimate interest to improve the services we provide
Perform credit checks	Contact details and payment information	We have a legitimate interest to ensure that we are likely to be paid for our services
Determine services that may be of interest to you	All the personal information we collect	We have a legitimate interest to improve the services we provide
To provide you with requested information	Contact details and services or other information you have requested we provide to you or your organisation	To comply with the request made by you
Direct marketing	Contact details and services that we have determined may be of interest to you or your organisation and/or which you or your organisation has purchased in the past	We may ask for your consent to process your data for this purpose, you may revoke your consent at any point. Alternatively, if you or your organisation has purchased similar services or products from us previously we may market similar products or services as a legitimate interest in developing our business. You have the right to opt out from such marketing at any time
Holding events	Your contact details, details of your attendance, your comments in response forms and dietary requirements	We have a legitimate interest in holding events and tracking attendance and providing appropriate food and drinks at events
Fraud, crime prevention and debt collection	All the personal information we collect	We have a legitimate interest in detecting and preventing crime and in collecting debts

Passing details of our AML checks to third parties	All the personal information we collect	The third parties have a legitimate interest in undertaking identity and AML checks
--	---	---

## Our legitimate business interests

Our legitimate interests in collecting and retaining your personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. To do that, we of course need to share the personal data of our candidates with our clients and vice versa. It's a pretty essential part of the process.

To support our candidates' career dreams and our clients' resourcing needs we need a database of candidate and client data containing historical information as well as current resourcing requirements.

Then to maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts who are interested in working with us. It's how we help the right people to meet the right people.

## Consent

Whenever we want or need to rely on consent to lawfully process your data we will get in touch and request your consent orally, by email or by an online process. This will be consent for a specific activity (such as checking you're happy for us to put you forward for a role), and we'll record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time – just get in touch and let us know.

## Other uses we will make of your data:

Use of our website;

We will use this information:

- to look after our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site and make sure that content is presented in the best way for you and for your computer;
- to let you participate in interactive features of our service, when you choose to do so;
- to help us keep our site safe and secure;
- to measure or understand how well our advertising is doing, and to deliver relevant advertising to you;
- to suggest and recommend to you and other users of our site any goods or services that may interest you or them.

We do not undertake automated decision making or profiling. Instead we use our computer systems to search and identify personal data in accordance with parameters set by a person, and a person will always be involved in the decision-making process. We're a recruitment firm, so of course we're powered by people.

## **Cookies**

Our website uses cookies to distinguish you from other users. This helps us to provide you with a better experience while you browse and also allows us to improve our site.

## **Disclosure of your information inside and outside of the EEA**

We're not part of a group, so we never share your information with other group members either in the EEA or outside of the EEA.

The nature of our work does mean we share your information with selected third parties including:

- clients in order to introduce candidates to them;
- candidates to arrange interviews and engagements;
- business partners and suppliers, so that we can meet performance and compliance obligations of any contract we enter into with them or you;
- subcontractors including email marketing specialists, event organisers, payment and other financial service providers and administrators to help us perform our work better
- analytics and search engine providers that help us improve our site;
- credit reference agencies, our insurance broker, compliance partners and other subcontractors to assess your suitability for a role where this is a condition of us entering into a contract with you.
- The Government or relevant regulators: we are required to do this by law or in case, to assist with their investigations, for example to cooperate with the Information Commissioner's Office.
- Police, law enforcement agencies and security services: to assist with any investigations, for prevention of crime and protection of national security.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Agency Bell Ltd. or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets. (But we aren't planning on retiring any time soon).
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of supply of services and other agreements; or to protect the rights, property, or safety of Agency Bell Ltd., our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The lawful basis for the third party processing will include:

- Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- satisfaction of their contractual obligations to us as our data processor;
- for the purpose of a contract in place or in contemplation;
- to fulfil their legal obligations.

## **Where we store and process your personal data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA as part of our recruitment services. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, transmitting information via the internet can never be completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **Retention of your data**

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it, and as long as you're happy for us to have it. That's why we have a data retention notice and run data routines to remove data that we no longer have a legitimate business interest in keeping.

We do the following to try to ensure our data is accurate:

Our database enables you to manage your data and to review whether the details we hold about you are accurate.

We keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:

- the nature of the personal data;
- how accurate we think it is;

- our legal obligations;
- whether an interview or placement has been arranged; and
- our recruitment expertise and knowledge of the industry by country, sector and job role.

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless you ask us to.

For your information, pseudonymised data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

## Your rights

You have the right to ask us not to use your personal data for marketing. We will usually inform you (before collecting your data) if we intend to use your data for such purposes. And the same if we intend to disclose your information to any third party for such purposes (which we've never done yet). Whatever happens, we will always collect express consent from you if legally required prior to using your personal data for marketing purposes.

You can opt in or out of such marketing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [myinfo@agencybell.co.uk](mailto:myinfo@agencybell.co.uk).

Our site may occasionally contain links to and from partner networks, advertisers and affiliates. If you follow a link to another site, they will have their own privacy policies, so we do not accept any responsibility or liability for these policies. It's always best to check these policies before you submit any personal data to these websites.

## The GDPR provides you with the following rights. To:

- **Request correction** of the personal information that we hold about you. That means you can correct or complete any of the data we hold, at any time.
- **Request erasure** of your personal information. That means you can ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes (not that we do much of that).
- **Request the restriction of processing** of your personal information. That means you can ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.



- **Request the transfer** of your personal information to another party in certain formats, if practicable.
- **Make a complaint** to a supervisory body. In the UK that's the Information Commissioner's Office, which can be contacted through this link: <https://ico.org.uk/concerns/>

### **Access to information**

The Data Protection Act 1998 and the GDPR give you the right to see what information is held about you. We also encourage you to get in touch and check that your data is accurate and complete.

Your right of access can be exercised in accordance with the Act.

To start this process, a subject access request should be submitted to [myinfo@agencybell.co.uk](mailto:myinfo@agencybell.co.uk).

### **Changes to our privacy notice**

If and when we change our privacy notice in the future, we'll always post it on this page and, where appropriate, notify you by e-mail. Please check back frequently to see any updates or changes.

### **Contact**

We're more than happy to receive questions, comments and requests about this privacy notice – simply drop us an email to [myinfo@agencybell.co.uk](mailto:myinfo@agencybell.co.uk).