

PRIVACY STATEMENT

The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement. At all times we will comply with current data protection laws.

1. Collection and Use of Personal Data

a. Purpose of processing and legal basis

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

If you have opted-in we may also send you marketing information and news via email. You can opt-out from receiving these at any time by clicking the Candidate Area button on the homepage of our website – www.shepherdstubbs.com – and updating your preferences. If you have forgotten your password you can re-set it via the Forgotten Password option.

In some cases we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

- Consent
- Legitimate interest
- Legal obligation
- Contractual obligation

b. Legitimate interest

Where the Company has relied on a legitimate interest to process your personal data our legitimate interests are as follows:

- Providing work-finding services to you and our clients;
- Managing our database and keeping work-seeker records up to date;
- Contacting you to seek your consent where we need it;
- Giving you information about similar products or services that you have used from us recently.

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c. Statutory/contractual requirement

The Company has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements.) Our clients may also require this personal data, and/or we may need your data to enter into a contract with you. If you do not give us personal data we need to collect we may not be able to continue to provide work-finding services to you or to process wage or other payments connecting with any undertaking of temporary assignment(s).

d. Recipient/s of data

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Clients (whom we may introduce or supply you to)
- Our CRM System where your information is securely stored
- Former employers whom we may seek references from
- Payroll & Pension service providers who manage payroll on our behalf
- Other recruitment agencies in the supply chain

2. Information to be provided when data collected not from the data subject

Categories of data: The Company has collected the following personal data on you:

- Name, address, mobile no., email
- National insurance no.
- Nationality (through right to work check)
- Information on your CV
- Your job/salary requirements
- Medical questionnaire – if completed
- Tax code & Bank details

Sensitive Personal Data:

- Health information including whether you have a disability
- Criminal conviction

Source of the personal data: The Company may have sourced your personal data/sensitive personal data from:

- CV Library, Total Jobs, Jobsite, Reed jobs boards, LinkedIn
- A referee whose details you previously provided to us
- Cookies listed in section 6

This information did not come from a publicly accessible source.

3. Overseas Transfers

The Company will not transfer the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

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4. Data Retention

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time. For example, the Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

Where the Company has obtained your consent to process your personal data, we will do so in line with our retention policy. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal data.

5. Your Rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data you have the right to withdraw that consent at any time by contacting Jonathan Shepherd-Stubbs at privacy@shepherdstubbs.com. Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where the Company will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.

If you believe that any of your data that the Company processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

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6. Cookies (see also Website Privacy Policy at <http://www.shepherdstubbs.com/privacy-policy/>)

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

We use cookies for the following purposes:

- a. **Status** – we use cookies to help us to determine if you are logged into our website and type of device being used to enable to serve data in the correct format – cookies used for this purpose are: `_ga`, `_gat`, `_gid`, `devicePixelRatio`;
- b. **Cookie consent** – we use cookies to store your preferences in relation to the use of cookies more generally – cookies used for this purpose are: `complianceCookie`, `CONSENT`.

Our service providers use cookies and those cookies may be stored on your computer when you visit our website. We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>. The relevant cookies are: `1p_JAR`, `NID`.

We also use Facebook advertising that uses demographics and job categories to identify users that may be interested in our recruitment services. The relevant cookies are: `fr`, `c_user`, `sb`, `datr`, `xs`, and `wd`.

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website. You can manage your preferences relating to the use of cookies on our website by modifying your browser settings and by selecting to use or not use cookies when prompted when visiting our site the first time.

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7. Log Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

8. Links to External Websites

The Company's website may contain links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Company's website.

9. Sale of Business

If the Company's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

10. Data Security

The Company takes every precaution to protect our users' information. Specifically:

- a. Regular computer security password changes (as a minimum every 3 months);
- b. All ports are closed preventing security breaches via remote desktop protocol (RDP) and file transfer protocol (FTP);
- c. Client PC's are protected by a software firewall and antivirus software;
- d. Limited access policy restricted to key personnel with legitimate basis for accessing data;

Only employees who need the information to perform a specific job – for example our recruitment consultants and recruitment managers/directors, our wages department and our CRM system database specialists are granted access to your information.

The Company uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email / the Internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email / the Internet.

If you share a device with others we recommend that you do not select the "remember my details" function when that option is offered.

If you have any questions about the security at our website, you can email Jonathan Shepherd-Stubbs at privacy@shepherdstubbs.com.

11. Changes to this Privacy Statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.

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12. Complaints or Queries

If you wish to complain about this privacy statement or any of the procedures set out in it please contact: Jonathan Shepherd-Stubbs (privacy@shepherdstubbs.com)

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

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