



## PRIVACY NOTICE

James and Partners Limited (Reg. No 08699856) T/A James and Partners Talent ("we" or "us") are committed to protecting and respecting your privacy. This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable data protection legislation.

Your rights under applicable UK data protection legislation are set out in this Privacy Notice.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. For data protection legislation, the data controller is James and Partners Limited (Reg. No 08699856) trading as James & Partners Talent, Office 2-05, The Old Town Hall, Wimbledon Quarter, 4 Queens Road, London, SW19 8YB.

Our Privacy Lead is Zak James (Director and Founder)

### **Who we are and what we do**

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We collect the personal data of the following types of people to allow us to undertake our business;

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

We collect information about you to carry out our core business and ancillary activities. Information you give to us, or we collect about you.

This is information about you that you give us when corresponding with us by phone, e-mail, or otherwise, or by filling in forms on our site [www.james-partners.com](http://www.james-partners.com) (our website). It includes information you provide when you register to use our services, to enter our database, subscribe to our services, attend our events, participate in discussion boards or other social media

functions on our site, enter a competition, promotion or survey, and when you report a problem with our site.

The information you give us or we collect about you may include your name, address, private and corporate e-mail address and phone number, financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website. Information we obtain from other sources.

This is information we obtain about you from other sources, such as LinkedIn, corporate websites, job boards, online CV libraries, your business card, personal recommendations, third-party payroll organisations, and others.

We work closely with contracted third parties, business partners, sub-contractors in technical, professional, payment, and other services, advertising networks, analytics providers, search information providers, credit reference agencies, professional advisors, and others. We may receive information about you from them for our recruitment services and ancillary support services.

**We use information held about you in the following ways:**

To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for temporary or permanent engagement. However, our service expands to supporting individuals throughout their careers and to supporting businesses' resourcing needs and strategies.

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation, and consent for specific uses of data.

We will rely on a contract if we are negotiating or have entered into a placement agreement with you or your organisation, or any other contract to provide services to you or receive services from you or your organisation.

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

We will, in some circumstances, rely on consent for particular uses of your data, and you will be asked for your express consent if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate).

### **Our Legitimate Business Interests**

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

- As a recruitment business and recruitment agency, we introduce candidates to clients for permanent employment, temporary worker placements, or independent professional contracts. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.
- In order to support our candidates' career aspirations and our clients' resourcing needs, we require a database of candidate and client personal data containing historical information as well as current resourcing requirements.
- To maintain, expand, and develop our business, we need to record the personal data of prospective candidates and client contacts.

### **Consent**

Should we want or need to rely on consent to lawfully process your data, we will request your consent orally, by email, or by an online process for the specific activity we require consent for and 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.

### **Other Uses we will make of your data:**

- use of our website;
- to notify you about changes to our service;
- to ensure that content from our site is presented most effectively for you and for your computer.

We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented most effectively for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;

We do not undertake automated decision-making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

### **Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a better experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them, see our Cookie Notice.

### **Disclosure of your information inside and outside of the European Economic Area (EEA)**

We will share your personal information with selected third parties, including:

- clients for the purpose of introducing candidates to them;
- candidates for the purpose of arranging interviews and engagements;
- clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you;
- subcontractors, including event organisers, payment and other financial service providers;
- analytics and search engine providers that assist us in the improvement and optimisation of our site;
- credit reference agencies, our insurance broker, compliance partners and other sub-contractors for the purpose of assessing your suitability for a role where this is a condition of us entering into a contract with you.

We will disclose your personal information to third parties:

- If we sell or buy any business or assets, we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If James & Partners Talent or substantially all of its assets are acquired by a third party, then personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data to comply with any legal obligation, or to enforce or apply our terms of supply of services and other agreements; or to protect the rights, property, or safety of James & Partners Talent, our customers, or others. This includes exchanging information with other companies and organisations for 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 a contract in place or in contemplation;
  - to fulfil their legal obligations.

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

Your personal data may be transferred to and processed in the United Kingdom and, where necessary, other countries in connection with our recruitment services. Where personal data is transferred internationally, we will ensure that appropriate safeguards are in place in accordance with the UK GDPR, including adequacy regulations or Standard Contractual Clauses where required. James & Partners Talent will take all reasonable steps necessary to ensure your personal data is treated securely and in accordance with this Privacy Notice.

All information you provide to us is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site or a site operated by a third party (for example, a client's time recording system), you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not 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 for our legitimate business interests (or other appropriate legal basis) and that you are happy for us to do so. Accordingly, we have a Data Retention Notice and run data routines to remove data that we no longer have a need to retain.

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

- Prior to making an introduction, we check that we have accurate information about you;
- We keep in touch with you so you can let us know of changes to your personal data.

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data include:

- the nature of the personal data;
- its perceived accuracy;
- our legal obligations;
- whether your CV has been sent to a client, and 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 into our database unless requested to do so. For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

Our current retention notice is available upon request.

### **Your rights**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes, and we will collect express consent from you if legally required before using your personal data for marketing purposes.

You can exercise your right to accept or prevent such processing 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 [info@james-partners.com](mailto:info@james-partners.com)

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Under the UK GDPR and the Data Protection Act 2018, you have the following rights:

- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to 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 the 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 to our processing of your personal information for direct marketing purposes.
- Request the restriction of the processing of your personal information. This enables you to 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, which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link:  
<https://ico.org.uk/concerns/>

### **Access to information**

The UK GDPR and the Data Protection Act 2018 give you the right to access personal information held about you. We also encourage you to contact us to ensure your data is accurate and complete. Your right of access may be exercised in accordance with applicable UK data protection legislation. A subject access request should be submitted to [info@james-partners.com](mailto:info@james-partners.com)

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

**Contact**

Questions, comments, and requests regarding this privacy notice are welcome and should be addressed to [info@james-partners.com](mailto:info@james-partners.com)