



# Privacy Policy

## Introduction

Keybar Limited trading as Keyman Personnel (referred to as the 'Company' throughout this notice) is registered in the United Kingdom with registration number 1382035, the registered address is Davis House, Robert Street, Croydon, CR0 1QQ, United Kingdom.

The Company contact for privacy and data protection matters is our Andrew Gallagher Finance Director, who can be emailed at [andrew.gallagher@keyman.uk.com](mailto:andrew.gallagher@keyman.uk.com).

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.

## Collection and use of personal data

### Data collected

The data the Company will collect is primarily information provided on a CV, resume or any similar information that you have provided to a social media or job board. This data includes:

- Name and address
- Contact details
- Right to work status
- Education history
- Work history
- Other indications of your suitability for a role

### Source of the personal data

The Company sourced your personal data / sensitive personal data by the following means:

- You provided the information directly to us;
- LinkedIn or other similar social media sites where you have shared your data and it is now publicly accessible;
- Job boards that you have provided your CV / Resume and you have made your personal data publicly accessible.

### 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. The legal bases we rely upon to offer these services to you are:



- Legitimate interest
- Legal obligation
- Contractual obligation
- Consent

### **Legitimate interest**

Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is that as a recruitment business we introduce candidates to clients for permanent employment, fixed-term employment and engagement on a temporary/contract basis, whether employed or self-employed. The exchange of personal data of our candidates and our clients is fundamental and an essential part of this process.

Since we aim to find work and enhance individuals careers we believe it is in the interests of the data subjects to hold their data.

### **Recipients of data**

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

- prospective employers, suppliers, customers, and clients.
- We may share data with our Financier as and when necessary.
- intermediaries such as umbrella companies.
- other third parties such as software solutions providers and back-office support.

### **Statutory/contractual requirement**

Your personal data is required by law and/or a contractual requirement (e.g. our client may require this personal data), and/or a requirement necessary to enter into a contract. You are obliged to provide the personal data and if you do not the consequences of failure to provide the data are:

- we will be unable to provide work finding services for you as it will not be possible to assess your suitability for roles that we are working on.
- we would be unable to enter into a contract with you without certain information.

### **Overseas Transfers**

The Company may transfer only the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the European Union member states plus Norway, Iceland and Liechtenstein.

We do not anticipate a need to transfer your data outside the EEA, however, if we do you can expect a similar degree of protection in respect of your personal data.



## 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.

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 records of payments to you or an intermediary for as long as is legally required by national minimum wage, social security and tax legislation.

Where the Company has obtained your consent to process your personal/sensitive 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 and sensitive personal data.

- Your CV and associated data (when we have not found work for you) – 7 years from the date of our last contact.
- Your CV and associated data (when we have found temporary work for you) – 7 years from the last date of payment.
- Your CV and associated data (when we have found permanent work for you) – 7 years from the date of our last contact.

## 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 the 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/sensitive personal data you have the right to withdraw that consent at any time by contacting our Finance Director.

## Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact our Finance Director. 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.