

Company Name:	Louise Hewett Recruitment Ltd ('the Company')
Company contact details:	Director - Ben Mannion (gdpr@hewett-recruitment.co.uk – Tel: 01562 69090)
Document DP5	Privacy Notice (including for use on the company website)
Topic:	Privacy Notice
Date:	October 2024
Version:	2.0

Hewett Recruitment is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including special categories of 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 this privacy statement. We will comply with current data protection laws at all times.

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1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company will collect your personal data (which may include special categories of 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/text. You can opt-out from receiving these at any time by clicking “unsubscribe” when you receive these communications from us.

On some occasions 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:

- Your consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you

b. Legitimate interest

This is where the Company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

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

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 require this personal data, and we may need your data to enter into a contract with you. If you do not give us the personal data we need to collect in order to comply with our statutory and legal requirements, we may not be able to continue to provide work-finding services to you.

d. Recipient/s of data

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

- Clients (who we may introduce or supply you to)
- Your former employers who we may seek references from

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- Payroll service providers who manage payroll on our behalf or other payment intermediaries who we may introduce you to
- Other recruitment agencies in the supply chain
- Auditors who are assessing the compliance and processes of the business to ensure its adherence to all relevant legislation and good practice guidance

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

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

Personal data:

- Name, address, mobile no., email
- National insurance no.
- Nationality (through right to work check)

Special categories of personal data:

- Health information including whether you have a disability
- Criminal conviction(s)

Source of the personal data: The Company sourced your personal data/special categories of personal data:

- From Reed, CV Library, TotalJobs, Hewett Recruitment website or LinkedIn
- Cookies listed in section 7

This information may have come from a publicly accessible source.

3. Overseas Transfers [Optional]

The Company will not transfer the information you provide to us to countries outside the UK and/or 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.

4. Data retention

The Company will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also 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 are required to keep your records relating to the right to work in the UK 2 years after employment or the engagement has ended alterable and working time records including your 48 hour opt out notice annual leave/holiday records 2 years from the time they were created.

Additionally, 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. This is currently 3 to 6 years.

Where the Company has obtained your consent to process your personal and special categories of 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.

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 and sensitive personal data you have the right to withdraw that consent at any time by contacting Ben Mannion on gdp@hewett-recruitment.co.uk. 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.

7. Cookies

We may obtain data about you from cookies. These are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies also enable us to deliver more personalised content.

The table below explains the cookies we use and why.

Cookie	Name	Purpose
First Party	Volcanic	First party cookies, served directly by Hewett Recruitment and web provider Volcanic to your computer. These cookies are used only by the website operator to recognize your computer when it revisits that site.
	volcanic_saved_jobs_id	This is used to store some jobs for users before they register on the website. These jobs can then be logged on the users account when they do register.
	volcanic_rumble_uid	This cookie name is associated with Volcanics CMS platform tracking. It is used to track and record the

		unique actions of each user on the website. By default it has no expiry date. The main purpose of this cookie is: Performance.
	_user_logged_in	This cookie name is associated with Volcanics CMS platform tracking. It is used to keep the user logged in if they leave the website and return. By default it expires after the users session ends. The main purpose of this cookie is: Performance.
	_oliver_session	This cookie name is associated with Volcanics CMS platform tracking. It is used to track the users session on the website for Analytics. By default it expires after the users session ends. The main purpose of this cookie is: Performance.
Third Party		including Google Analytics and Facebook, may use cookies, web beacons, and other storage technologies to collect or receive information from our website and elsewhere on the internet and use that information to provide measurement services and target adverts. We also use Google Analytics to analyse the use of our website and help us create a more useful and easy to use site. This is a web analytics service provided by Google. Google Analytics uses “cookies”, which are text files placed on your computer, to collect information such as visitor numbers and the most popular pages Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit http://www.aboutcookies.org or www.allaboutcookies.org . Please note that in a few cases some of our website features may not function if you remove cookies from your browser. How to control or delete cookies You have the right to choose whether or not to accept cookies and we have explained how you can exercise this right in the table above. However, please note that if you choose to refuse cookies you may not be able to use the full functionality of our website. You can block cookies by using the opt-out links provided in the table above, or by changing your browser settings so that cookies from this website cannot be placed on your computer or mobile device. In order to do this, follow the instructions provided by your browser (usually located within the “Help”, “Tools” or “Edit” facility). The below hyperlinks provide further guidance on

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		<p>how to disable the use of cookies on certain browsers, and/or on how to delete cookies: Chrome; Internet Explorer; Safari and Apple support page; Mozilla Firefox; Google Privacy Policy; Chrome web store. Please note that using a third party opt-out link to disable a cookie or category of cookie may not delete the cookie from your browser but simply disable it from future use. If you wish to delete the relevant cookie, you will need to do this yourself from within your browser.</p>
<p>Facebook Advertisement</p>		<p>We use Facebook Pixel and Facebook Custom Audiences to deliver interest-based advertisements on Facebook. These tools allow us to personalise our service experience with Hewett Recruitment.</p> <p>Customer Audiences: This feature provided by Facebook allows Hewett Recruitment to present relevant adverts to our target audience of users, based on email address provided. We do not share any of your personal information, including search history, with Facebook. The tool lets Hewett Recruitment convert your email address to a unique number that Facebook uses to match to unique numbers Facebook generates from its users.</p> <p>Facebook Pixel: Based on cookies gathered, the Conversion Tracking Pixel service of Facebook Inc, allows Hewett Recruitment to follow the actions of users after they are redirected to our website by clicking on a Facebook advertisement. We are then able to record the efficiency of advertising efforts for statistical and market research purposes. The collected data will remain anonymous. This means that we cannot see your personal data of any individual users. However, the collected data are saved and processed by Facebook . We are informing you on this matter according to our information at this time. Facebook is able to connect the data with your Facebook account and use the data for their own advertising purposes, in accordance with Facebooks Data Usage Policy found here: https://www.facebook.com/about/privacy.</p>
<p>Links to External websites</p>		<p>The Company's website may contains 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</p>

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		applies solely to information collected by the Company's website.
NextRoll, Inc., and its business divisions AdRoll and RollWorks (collectively, 'NextRoll')	__adroll', 'adroll_v4' and '__adroll_fpc'	NextRoll and our advertising partners process personal data to: Store and/or access information on a device; Create a personalised content profile; Select personalised content; Personalised advertising, advertising measurement, audience research and services development; Services development. For some of the purposes above, our advertising partners: Use precise geolocation data. Some of our partners rely on their legitimate business interests to process personal data.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies. Please note that in a few cases some of our website features may not function if you remove cookies from your browser.

8. Login 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.

9. 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.

10. 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. Where the sale of the business results in the transfer of your details to a different data controller we will notify you of this.

11. Data Security

The Company takes every precaution to protect users' information including firewalls, browser certification technology, encryption, limited access, use of passwords and multi-factor authentication.

Only employees who need the information to perform a specific job (for example, consultants, our accounts clerk or a marketing assistant) 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

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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 Ben Mannion – gdpr@hewett-recruitment.co.uk.

12. 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.

13. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Director, Ben Mannion – gdpr@hewett-recruitment.co.uk, 01562 69090.

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