

Company Name:	Louise Hewett Recruitment Ltd ('the Company')
Company contact details:	Ben Mannion – Director gdpr@hewett-recruitment.co.uk – Tel: 01562 69090
Document DP5A	Privacy Notice (when personal data is obtained directly from the data subject)
Topic:	Data Protection
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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.

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.

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.

The legal bases we rely upon to offer these 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:

- Where you have contacted us to provide you with work finding services, we will process your personal details (name, address, telephone numbers and email addresses) so that we can contact you about any temporary and permanent opportunities that may be of interest to you based on your skills and experience and any other relevant information you have freely provided to us in order to assist us in matching you to the most suitable positions.
- We will retain your CV and any additional documentation you provide to us (which might include evidence of qualifications and or evidence of work to demonstrate your level of skill/experience) to help us match you to suitable vacancies.
- Please do not provide us with any information you do not wish us to hold or process.
- In order to help us ensure your suitability for positions we will also be required to take up references – you will therefore need to provide us with contact details of referees or evidence of a reference that we can verify. You will need to obtain their permission before we can contact them.
- Hewett Recruitment have identified, due to our local geographical presence and relationships we build with our candidates and clients, that many candidates are registered with us for a number of years moving from job to job as they progress through their career. We are passionate about building relationships and as such your career history and data we hold on you about how we have assisted you during the period in which we provide you with work finding services will grow and will include the following:
 - Companies and vacancies that we have submitted your CV and details to
 - Details of any interviews you have undertaken that have been arranged by us
 - Details of any placements that you have undertaken through us or provided by us It is important for us to retain such personal data relating to your activity, work and career so that we can better provide our services to you.
- Your personal and sensitive personal data will be inputted into our CRM database to enable us to manage the data in a secure and safe manner as well as utilising the facilities within the database to help provide you with work finding services.
- Hard copies of Applications forms, ID and other documentation that you complete, sign or provide us with will be stored securely with restricted access and at the appropriate time will be treated as confidential waste and securely shredded and disposed of.
- Please see our Data Retention Policy for details on how long we will store your data

c. 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)
- Former employers whom we may seek references from
- Other recruitment agencies in the supply chain
- Auditors who are assessing the compliance and processes of the Company to ensure it is adhering to all relevant legislation and good practice guidance

d. 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 it is a requirement necessary to enter into a contract.

- Where a client requires us to submit your data via an online portal in order for them to manage the recruitment process or temporary workers assigned to them
- Personal details are required to be submitted when you undertake an assignment at a company regulated by the Gangmaster Licencing and Abuse Authority (GLAA) and such data is required for

inspection by the regulating authority or working for a client where they are regulated by the MOD or Security industry.

We are obliged to provide relevant personal data and if you object to the processing the consequences of failure to provide the data are:

- We may be unable to offer you a placement with the client if we cannot meet their requirements by submitting relevant personal data;
- Your placement may be terminated if you fail to provide the required personal data within any given timeframe.

We will only share relevant personal data with clients only when it is required in order for us to perform a particular contractual obligation with a particular client.

Overseas Transfers

The Company will not transfer only 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.

2. 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.

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 and special categories of personal data, we will do so in line with our retention policy, please refer to 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.

3. 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.

HEWETT RECRUITMENT

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, Director – email gdpr@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. We will inform you if this is the case. Where this is the case, we will restrict the data to only what is necessary for the purpose of meeting 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.

5. Complaints or queries

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

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, if you believe that your data protection rights have not been adhered to.