
PRIVACY NOTICE (TIER 4)

IT Governance are experienced data protection practitioners and all document templates are provided as general guidance. Users of these documents should consult their own legal advisers for legal advice specific to their own circumstances and IT Governance accepts no liability of any sort arising from the use of these templates.

1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 Our GDPR Owner and Data Protection Representative is responsible for ensuring that this notice is made available to data subjects prior to 101 Recruitment collecting/processing their personal data.
- 2.2 All Employees/Staff of 101 Recruitment who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

We offer specialist recruitment services to businesses and persons.

Our GDPR Owner and Data Protection Representative can be contacted directly here:

- david@101recruitment.co.uk
- 07580 583 450

The personal data we would like to collect from & process on you is:

Personal data type:	Source (where 101 Recruitment obtained the personal data from if it has not been collected directly from you, the data subject):
Name	3 rd party online job board / CV database i.e. www.cvlibrary.co.uk
Email Address	LinkedIn
Contact Number	
Company Address Details	

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The personal data we collect will be used for the following purposes:

- For matching your skill sets with relevant job vacancies, to assist us in finding you the position that most suits you;
- To keep you informed of relevant opportunities as they arise;
- To put forward your details to our clients and prospective employers for you to be considered for vacancies;
- For keeping you informed of company services, news and insight related to your specialisms when you have granted us permission to do so;
- To improve our customer service and make our services more valuable to you;
- To notify you about upcoming HR events when you have granted us permission to do so

Information we obtain from other sources:

- This is information we obtain about you from other sources such as LinkedIn, job board websites, online CV libraries, your business card, or personal recommendations. In this case we will inform you, by sending you this privacy notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.

3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for 101 Recruitment to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by emailing us on david@101recruitment.co.uk

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3.3 Disclosure

101 Recruitment will not pass on your personal data to third parties without first obtaining your consent. Your CV and related information will be shared or sent to prospective employers (our clients). If you secure a new role through 101 Recruitment, additional information will need to be provided to them to enable the placement to proceed.

3.4 Retention period

101 Recruitment will process personal data when working for the client and will store the personal data indefinitely with your consent. Otherwise data will be removed at an agreed time.

3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that 101 Recruitment refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by 101 Recruitment, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and 101 Recruitment's data protection representatives Data Protection Officer (DPO) and GDPR Owner.

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The details for each of these contacts are:

	Supervisory authority contact details	[Data Protection Officer (DPO)] / [GDPR Owner] contact details
Contact Name:	Information Commissioner's Office	David Calleja-Gera
Address line 1:	Wycliffe House	56 Brighton Road
Address line 2:	Water Lane	
Address line 3:	Wilmslow	Cheltenham
Address line 4:	Cheshire	Glos
Address line 5:	SK9 5AF	GL52 6BA
Email:		david@101recruitment.co.uk
Telephone:		07580 583 450

4. Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

How we use your information

This privacy notice tells you how we, 101 Recruitment, will collect and use your personal data for communicating with you regarding potential job opportunities.

Why does 101 Recruitment need to collect and store personal data?

In order for us to provide you with a service we need to collect personal data for correspondence purposes and/or detailed service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes 101 Recruitment would contact you for additional consent.

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Will 101 Recruitment share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to 101 Recruitment in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to complete jobs relating to 101 Recruitment such as accounting. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will 101 Recruitment use the personal data it collects about me?

101 Recruitment will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. 101 Recruitment is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will 101 Recruitment contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

101 Recruitment at your request, can confirm what information we hold about you and how it is processed. If 101 Recruitment does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the Data Protection Officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of 101 or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.

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- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

101 Recruitment accepts the following forms of ID when information on your personal data is requested:

Passport, driving licence, birth certificate, utility bill (from last 3 months), etc.

Contact details of the [Data Protection Officer (DPO)] / [GDPR Owner]:

	[Data Protection Officer (DPO)] / [GDPR Owner] contact details
Contact Name:	David Calleja-Gera
Address line 1:	
Address line 2:	56 Brighton Rd
Address line 3:	Cheltenham
Address line 4:	Glos
Address line 5:	GL52 6BA
Email:	David@101recruitment.co.uk
Telephone:	07580 583 450

Document Owner and Approval

The Data Protection Officer (DPO) / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

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A current version of this document is available to all members of staff on the website and is published

Signature:

Date: 24.05.18

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	DCG	24.05.18