

#### **Privacy Policy**

This Privacy Policy sets out how ProcureOne uses and protects any information that you give to us.

ProcureOne (the Company) is a recruitment business which may collect and process your data to provide work-finding services. In this way the Company acts as a data controller.

The Company is committed to ensuring that your privacy is protected. We will only use your data in accordance with the terms of the following privacy statement.

#### 1) Collection and Processing of Personal Data

- Purpose of processing and legal basis. The Company must have a legal basis for processing your personal data. The legal basis we rely upon to offer these services to you are: Consent
- ii) **Recipients of data**. The Company will process your data and/or personal and sensitive data with the following recipients; Clients of the Company, GDPR compliant database company, payroll provider, pensions provider (if applicable).

#### 2) What we collect and where from

We may collect the following Information:

- Name and job title
- Contact information including email address
- Demographic information such as postcode, preferences and interests
- Curriculum Vitae information and data
- Other Information relevant to customer surveys and/or offers.

We may collect the information from:

- A direct job application directly to the Company or via a job advertisement
- A speculative approach by you to us
- A CV submission from you to us following an unsolicited approach such as a head hunt.

## 3) What we do with the information we gather

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping
- To improve our products and services and facilitate the recruitment process
- To send your information to Client's in order to apply for jobs or assess your eligibility for jobs.
- We may periodically send promotional emails about our products, service, networking
  events, promotions or information which we think you may find interesting using the email
  address which you have provided.
- To answer your questions and enquiries
- To obtain from third parties information such as references, qualification checks and criminal reference checks to verify the details you have provided to us.
- To provide to regulatory or law enforcement agencies if we believe in good faith that we are required by law to disclose it in connection with the detection of crime, the collection of taxes or duties, in order to comply with any applicable law or order of a court of competent jurisdiction, or in connection with legal proceedings;
- To monitor compliance to support our equal opportunities policy.
- From time to time we may seek your consent to process, use or disclose your information for any other purposes not listed above.

## 4) 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 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.

# 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 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.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen

Where you have consented to the Company processing your personal data and/or sensitive personal data you have the right to withdraw that consent at any time by contacting Julie Edwards at info@procureone.co.uk

#### 6) Disclose of Information to the Company's Clients

Our Client data is held on our GDPR Compliant database. We may vet prospective Clients for creditworthiness, trading history and any other pertinent factors.

#### 7) Sale of Business

We reserve the right to transfer your information in the event of a sale, integration or merger.

#### 8) Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information. We use industry standard firewall technology to protect your personal data in our database (our CRM database 'Bullhorn' is GDPR compliant) and email system. Any paper based personal data, such as references, shall be viewable and securely stored by relevant staff who need access to such data. When we dispose of any paper based personal data we ensure that it is shredded and re-cycled

#### 9) How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

# 10) Queries or Questions

If you believe that any information we are holding on you is incorrect or incomplete, please write to us as soon as possible, at <a href="mailto:info@procureone.co.uk">info@procureone.co.uk</a>. We will promptly correct any information found to be incorrect.

If you have questions or wish to complain about this privacy notice or the details contained within, please contact Julie Edwards at <a href="mailto:julie@procureone.co.uk">julie@procureone.co.uk</a>

The Company may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from and was last updated in September 2019.