



Etonwood Limited

info@etonwood.co.uk or call on 02031026850

Data Protection Privacy Policy

25th May 2018

Introduction:

Etonwood Limited (company number 10423022) is committed to protecting the privacy of our candidates, clients and users of our website. We want to provide a safe and secure user experience.

We will ensure that the information you submit to us via our website or through any of our offices or other international websites or offices is only used for the purposes set out in this policy.

At a glance:

This Policy explains when and why we collect personal information about people who enquire about roles we advertise. The policy also explains how we use that information, the conditions under which we may disclose information to others and how we keep personal information secure. At Etonwood Limited we're committed to protecting and respecting your privacy and are transparent in everything we do. We may change this Policy from time to time so please check this page to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this Policy.

Who is the controller of the data that you provide to us?

Etonwood Limited is registered as a data controller in the United Kingdom for the purposes of the Data Protection Act 1998 (soon to be 2018) and the General Data Protection Regulation. We ensure that the data you supply to us is processed fairly and lawfully, and with skill and care and used only for the purposes set out in this policy.

The Company 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:

- Consent
- Legitimate interest
- Legal obligation
- Contractual obligation

What type of data will we collect?

We will collect data about you, both **personal data** (such as your name and contact details) and **sensitive personal data** (such as information in your CV). Depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the information listed below to enable us to offer you employment opportunities which are tailored to your circumstances and your interests. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions.

- Name;
- Age/date of birth;
- Sex/gender;
- Photographic ID; A copy of your driving licence and/or passport/identity card;
- Marital status; details;
- Education details;
- Employment history;
- Emergency contacts and details of any dependants, Referee details;

- Immigration status (whether you need a work permit);
- Nationality/citizenship/place of birth;
- Financial information (where we need to carry out financial background checks);
- Social security number (or equivalent in your country) and any other tax-related information;
- Diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information;
- Details of any criminal convictions if this is required for a role you are applying for;
- Details about your current remuneration, pensions and benefits arrangements, Information on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website;
- Extra information that you choose to tell us;
- Extra information that your referees chooses to tell us about you;
- Extra information that our clients may tell us about you, or that we find from other third party sources such as job sites;
- IP address;
- The dates, times and frequency with which you access our services; and CCTV footage if you attend our premises.

Lawful Basis for Collecting Data

a) The lawfulness of *processing* conditions for *personal data* are:

1. *Consent* of the individual for one or more specific purposes.
2. *Processing* is necessary for the performance of a contract with the individual or in order to take steps at the request of the individual to enter into a contract.
3. *Processing* is necessary for compliance with a legal obligation that the controller is subject to.
4. *Processing* is necessary to protect the vital interests of the individual or another person.
5. *Processing* is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the *data controller*.
6. *Processing* is necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the individual which require protection of *personal data*, in particular where the individual is a child.

b) The lawfulness of *processing* conditions for *sensitive personal data* are:

1. Explicit *consent* of the individual for one or more specified purposes, unless reliance on *consent* is prohibited by EU or Member State law.
2. *Processing* is necessary for carrying out data controller's obligations under employment, social security or social protection law, or a collective agreement, providing for appropriate safeguards for the fundamental rights and interests of the individual.
3. *Processing* is necessary to protect the vital interests of the individual or another individual where the individual is physically or legally incapable of giving *consent*.
4. In the course of its legitimate activities, *processing* is carried out with appropriate safeguards by a foundation, association or any other not-for-profit body, with a political, philosophical, religious or trade union aim and on condition that the *processing* relates only to members or former members (or those who have regular contact with it in connection with those purposes) and provided there is no disclosure to a third party without the *consent* of the individual.
5. *Processing* relates to *personal data* which are manifestly made public by the individual.
6. *Processing* is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
7. *Processing* is necessary for reasons of substantial public interest on the basis of EU or Member State law which shall be proportionate to the aim pursued, respects the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the individual.
8. *Processing* is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional and subject to the necessary conditions and safeguards.
9. *Processing* is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare and of medicinal products or medical devices, on the basis of EU or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the individual, in particular professional secrecy.
10. *Processing* is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard fundamental rights and interests of the individual.

How do we use your personal data?

The personal data and sensitive personal data will be stored, processed, used and disclosed by us in the following ways.

- Provision of services and account management:
- To provide our recruitment services to you and to facilitate the recruitment process
- To assess data about you against vacancies which we judge may be suitable for you
- To send your information to clients to apply for jobs or assess your eligibility for jobs
- To answer your questions and enquiries
- To pay you for employment related goods and services
- To use your information on an anonymised basis to monitor compliance with our equal opportunities policy
- To carry out our obligations arising from contracts entered into between you and us
- From time to time we may seek your consent to process, use or disclose your information for any other purpose not listed above.

How do we share your personal data?

Etonwood Limited Ltd. may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process products and send you mailings). These third parties may include:

- We use third party service providers to provide a recruiting software system.
- We also share your personal data with other third-party service providers that may assist us in recruiting talent, administering and evaluating pre-employment screening and testing, and improving our recruiting practices.
- To third parties where we have retained them to provide services that we, you or our client have requested including references, qualifications, credit and criminal reference checking services.
- To third parties, 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.



We may also pass your information to, or allows access to such information to the Etonwood Limited group of companies, in order that they may use your personal information in the same way as we process, use and disclose your information as described above. We reserve the right to transfer your information to a third party in the event of a sale, merger, liquidation, receivership or transfer of all or substantially all the assets of our company, provided that the third party agrees to adhere to the terms of this Privacy Policy and provided that the third party only uses your Personal Data for the purposes that you provided it to us. You will be notified in the event of any such transfer and you will be afforded an opportunity to *opt-out*.

How do we safeguard your personal data?

Data security is of great importance to Etonwood Limited Ltd and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website. Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password, which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. *We ask you not to share your password with anyone.*

We are concerned to protect the privacy of children aged 18 or under. If you are aged 18 or under, please get your parent/ guardians permission beforehand whenever you provide us with personal information. If we learn that we have collected the personal information of a child under the relevant minimum age without parental consent, we will take steps to delete the information as soon as possible. Parents who believe that their child has submitted personal information to us and would like to have it deleted may contact us at info@etonwood.co.uk

How do we keep your personal data?

We will hold your data for no longer than it is required and in accordance with our data retention and disposal policy which can be found in *Schedule 1*. We will use reasonable endeavours to ensure that your Personal Data is maintained and up to date. We rely on you to inform us of all changes to your Personal Data to ensure that it is up to date and we will update or delete your Personal Data accordingly.



How do we access/amend your personal data?

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you.

In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please email us at:

info@etonwood.co.uk

You have the right to ask for a copy of the information we hold about you.

If you wish to raise a complaint on how we have handled your personal data, you can contact our Data Protection Officer who will investigate the matter. Our Data Protection Officer is Siobhán Kehoe and you can contact them at siobhan.kehoe@etonwood.co.uk or call them on 0203 714 5728. If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office (ICO).

How do we store and transfer your personal data?

Data, which we collect from you, may be stored and processed in and transferred to countries outside of the European Economic Area (EEA). For example, this could occur if our servers are located in a country outside the EEA or one of our service providers is situated in a country outside the EEA. We also share information with our group companies, some of which are located outside the EEA. These countries may not have data protection laws equivalent to those in force in the EEA. If we transfer Data outside the EEA in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected as outlined in this privacy policy. You expressly agree to such transfers of Data.

What are cookies and how are they used?

Like many other websites, the Etonwood Limited website uses cookies. Cookies are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service. It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

Profiling

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you.

We may make use of additional information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and reduce fraud and credit risk.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

Service improvements:

- to ensure that content from our site is presented in the most effective manner for you;
- to administer our site and for internal business administration and operations, including
- troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to notify you about changes to our service;
- as part of our efforts to keep our site safe and secure

Consent - Your individual 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.

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change your email address, or any of the other information we hold is inaccurate or out of date, please contact us at: info@etonwood.co.uk

Complaints or Queries

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Information Commissioner's Office (ICO). Details can be found here: <https://ico.org.uk/concerns>.

Changing and reviewing this Privacy Policy

Etonwood Limited Ltd reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

We keep this Policy under regular review. This Policy was last updated in May 2018.

You may contact Etonwood Limited Ltd by email at info@etonwood.co.uk

Schedule 1: Data Retention Policy

Etonwood Data Retention Schedule						
Employment - Type of Record		Minimum Retention Period - then destroyed	Who has access	Location	Lawful basis	Reason for Length of Period
Application forms, CVs, references and interview notes for candidates open to opportunities (consent to be on our database has been given)		6 years	Consultants, MD, Finance, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(f) https://gdpr-info.eu/art-6-gdpr/ - Legitimate interest	Allows for appropriate time to place candidate in role, appeal mechanism and monitoring future claims
Application forms, CVs, references and interview notes for unsuccessful candidates		2 years	Consultants, MD, Finance, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(f) https://gdpr-info.eu/art-6-gdpr/ - Legitimate interest	Allows for appropriate time to place candidate in role, appeal mechanism and monitoring future claims
All personnel files (EXCLUDING information on disciplinary and/or grievance proceedings (but including health information, application forms and references))		6 years from the end of employment	Consultants, MD, Finance, Operations	Microsoft Exchange shared drive.	https://gdpr-info.eu/art-6-gdpr/ - Legal or regulatory obligation	Provision of references and potential litigation. Immigration, Asylum and Nationality Act 2006
Documentation relating to grievance hearings (notes, reports etc) NOTE: Grievance Committee members must hand in all paperwork at the end of a meeting/hearing to avoid retention of duplicate documents		2 years	MD, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(f) https://gdpr-info.eu/art-6-gdpr/ - Legitimate interest	Allows for appropriate appeal mechanism and monitoring future grievances
Staff Discipline	Oral/verbal warning - brief note on file (subject to satisfactory conduct and performance)	2 years	MD, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(f) https://gdpr-info.eu/art-6-gdpr/ - Legitimate interest	Allows for appropriate appeal mechanism and monitoring future disciplinarys
Staff Discipline	Written warning - including notes of disciplinary hearings kept on file (subject to satisfactory conduct and performance)	2 years	MD, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(f) https://gdpr-info.eu/art-6-gdpr/ - Legitimate interest	Allows for appropriate appeal mechanism and monitoring future disciplinarys

Income Tax and NI Returns, including correspondence with tax office	6 years after end of the financial year to which the records relate	Finance, MD, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(c) https://gdpr-info.eu/art-6-gdpr/ - Legal or regulatory obligation	Income Tax (Employment) Regulations 1993
Wages and salary records	6 years	Finance, MD, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(c) https://gdpr-info.eu/art-6-gdpr/ - Legal or regulatory obligation	Taxes Management Act 1970
Statutory Maternity Pay records and calculations	6 years after end of the financial year to which the records relate	Finance, MD, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(c) https://gdpr-info.eu/art-6-gdpr/ - Legal or regulatory obligation	Statutory Maternity Pay (General) Regulations 1986
Statutory Sick Pay records and calculations	6 years after end of the financial year to which the records relate	Finance, MD, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(c) https://gdpr-info.eu/art-6-gdpr/ - Legal or regulatory obligation	Statutory Sick Pay (General) Regulations 1982
Accident books, and records and reports of accidents	3 years after the date of the last entry	MD, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(c) https://gdpr-info.eu/art-6-gdpr/ - Legal or regulatory obligation	Social Security (Claims and Payments) Regulations 1979; RIDDOR 1985

Commercial - Type of Record	Minimum Retention Period - then destroyed	Who has access	Location	Lawful basis	Reason for Length of Period
Accounting & reporting (Scope: Statutory, corporate and management accounts, abstracts, ledgers, budgetary control records)	Retain records 6 years after the end of the financial year in which records created	MD, Finance, Operations	Xero software, In-Time software, Microsoft Exchange shared drive.	GDPR Article 6.1(c) https://gdpr-info.eu/art-6-gdpr/ - Legal or regulatory obligation	Companies Act 2006 and Value Added Tax Act 1994 s.6 and Finance Act 1998 Sch.18 pt. 3
Banking admin (Scope: Bank accounts administration including instruction and payments, bank deposits, account monitoring and reconciliation}	Retain records 6 years after the end of the financial year in which records created	MD, Finance, Operations	Xero software, In-Time software, Microsoft Exchange shared drive.	GDPR Article 6.1(c) https://gdpr-info.eu/art-6-gdpr/ - Legal or regulatory obligation	Companies Act 2006 and Value Added Tax Act 1994 s.6 and Finance Act 1998 Sch.18 pt. 3
Procurement - contract awards, sales prospecting, bids, proposals (Scope: Pre-tender planning, tender process , contract award and contract management including pre-qualification questionnaires, requests for information, invitations to tender, tender evaluation, tender negotiation, supplier approval, bids and correspondence)	Retain records 6 years after the end of the financial year in which records created	MD, Finance, Operations	Xero software, In-Time software, Microsoft Exchange shared drive.	GDPR Article 6.1(c) https://gdpr-info.eu/art-6-gdpr/ - Legal or regulatory obligation	6 years after contract end unless the authority for awarded contracts depends on the nature or value of contract Limitation Act 1980 s.5 or Limitation Act 1980 s.8 or Limitation Act 1980 s.14B
Facilities Mgt - Scope: Visitors books and signing-in sheets, venue and resources enquiries and booking	Retain for one month	MD, Finance, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(f) https://gdpr-info.eu/art-6-gdpr/ - Legitimate interest	
Purchasing and Payment Processing (Scope: Orders, credit notes, creditor invoices, delivery notes, payment records, records of advances)	Retain records 6 years after the end of the financial year in which records created	MD, Finance, Operations	Xero software, In-Time software, Microsoft Exchange shared drive.	GDPR Article 6.1(f) https://gdpr-info.eu/art-6-gdpr/ - Legitimate interest	Companies Act 2006 and Value Added Tax Act 1994 s.6 and Finance Act 1998 Sch.18 pt. 3

Events Mgt - Scope: Management of communications, marketing, engagement and training events, partner organisations, supported organisations and their services, and management of business events including development of programmes of events, event planning, delegate, event delivery and evaluation	Retain for one year after the event	MD, Finance, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(f) https://gdpr-info.eu/art-6-gdpr/ - Legitimate interest	Companies Act 2006 and Value Added Tax Act 1994 s.6 and Finance Act 1998 Sch.18 pt. 3
Health & Safety - Type of Record	Minimum Retention Period - then destroyed	Who has access	Location	Lawful basis	Reason for Length of Period
Pre-employment health screening questionnaire	During employment plus 3 years	MD, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(c) https://gdpr-info.eu/art-6-gdpr/ - Legal or regulatory obligation	Management of Health and Safety at Work Regulations 1999
Occupational Health Records - health surveillance and medical records relating to risk assessments or incidents occurring at work	40 years	MD, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(c) https://gdpr-info.eu/art-6-gdpr/ - Legal or regulatory obligation	Management of Health and Safety at Work Regulations 1999 Noise at Work Regulations 1989
Occupational Health Records where reason for termination of employment is connected with health, including stress related illness	During employment plus 3 years	MD, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(c) https://gdpr-info.eu/art-6-gdpr/ - Legal or regulatory obligation	Limitation period for personal injury claims (there may be circumstances where it is not practical to separate these from other Occupational Health Records)
Records relating to asbestos, medical records, training records, suspect incidents of potential exposure	40 years	MD, Operations	Microsoft Exchange shared drive.	GDPR Article 6.1(c) https://gdpr-info.eu/art-6-gdpr/ - Legal or regulatory obligation	Control of Asbestos at Work Regulations 2002