



Company Name:	Highgrade Recruitment Ltd
Document DP5 DP5 A & B	Privacy Notices Policy
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Highgrade Recruitment Ltd 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 this privacy statement. At all times we will comply with current data protection laws.

When we will issue the transparency information:

- When we collect the personal data from the individual directly we should give him or her the transparency information when we first collect the personal data (eg. Upon sign up meeting). [Article 29 Working Party's guidelines on transparency. The ICO has also issued guidance which states that it is best practice to issue the privacy notice using the same medium through which you collected the data.](#)
- Where we do not collect the personal data from the data subject (e.g. collect it from a third party data controller such as a jobs board, or from another data subject or a public source) – we should give the individual the transparency information no later than one month after you collected the data, or when we first communicate with the client if that is before one month expires.
- If we disclose the personal data to a third party and that disclosure happens before the one month expires, then we must give the transparency information no later than the first disclosure.

Contents

1. Collection and use of personal data
 - a. Purpose of processing and legal basis
 - b. Legitimate interest
 - c. Statutory/contractual requirement
 - d. Recipients of data
2. Information to be provided when data is not collected directly from the data subject
 - a. Categories of data
 - b. Sources of data
3. Overseas transfers
4. Data retention
5. Your rights
6. Automated decision making
7. Cookies
8. Login files
9. Links to external sites
10. Sale of the business
11. Data security
12. Changes to this privacy statement
13. Complaints or queries

1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company will 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. 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.

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: a consent declaration is available upon sign up
- Where we have a legitimate interest: detailed legitimate purposes are listed on consent form
- To comply with a legal obligation that we have: Highgrade operates in line with legal obligations
- 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 that you have used from us recently;
- To process your information to the clients and schools and third parties (Governing Bodies)

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 also require this personal data, and/or we may need your data to enter into a contract with you. If you do not give us the personal data that we need to collect 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 (whom we may introduce or supply you to)
- Former employers whom we may seek references from

- Payroll service providers who manage payroll on our behalf
- Other recruitment agencies in the supply chain

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

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

Personal data:

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

Sensitive personal data:

- [Health information including whether you have a disability]
- [Criminal conviction]

Source of the personal data: The Company sourced your personal data/sensitive personal data:

- A former employer [name]
- A referee whose details you previously provided to us [name]
- Software providers who we use to support our services including [list]
- Cookies listed in section 7

This information came from a publicly accessible source.

3. Overseas Transfers [Optional]

The Company will not transfer the information you provide to us to countries outside 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. Full details for retention terms are available upon request.

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 sensitive personal data, we will do so in line with our retention policy. Full details of retention terms are available. 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:

Claire James 01495 369889 or claire@highgraderecruitment.com

You will need to complete a withdrawal form, available upon request.

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.

6. Automated decision-making

Highgrade Recruitment Ltd does not use Automated Decision-making at this time. If in the future this system is introduced all client will be informed.

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 in order 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	Type	Time	Information
PHPSESSID	Strictly necessary	Until you close your Browser	To maintain information about each visit to the website and enable core site functionality. This cookie does not contain any personal information, and only lasts for the duration of your visit
DYNSRV,ADMINDYNSRV	Strictly necessary	Until you close your Browser	<p>We use more than one server to provide web pages. When you visit the website, you are assigned to one of several servers. This cookie is required to track which server you are communicating with in order to present a consistent user experience and remember information about the data you have entered.</p> <p>This cookie does not identify you personally and is not linked to any other information we store about you.</p>
Viewed_cookie_policy	Functionality	1 Year	Saves messages and lets us know that you've seen our cookie message
Wordpress_test_cookie	Strictly necessary	Until you close your Browser	A test performed to see if cookies are enabled on your browser
Wordpress_*	Functionality	12 months	Used to maintain any users identity if they log into the site
Comment_author, comment_author_email, Comment_author_url	Functionality	2 weeks	Cookies beginning with "comment_author_..." are only stored if you make a comment on the site. They store your name, email and website so you don't need to re-input each time you make a comment on the site.
Woocommerce_cart_hash	Functionality	Until you close your Browser	Enables the functionality of viewed pages
_t	Strictly necessary	Years	Token used to identify the user between main website and forum
_forum_session	Strictly necessary	Until you close your browser	Set to track login-in status for the online community.
Theme_key	Functional	Years	Stores users selected theme
_ga	Analytics	2 years	<p>We use Google Analytics software to collect information about how you use our website. We do this to help make sure the site is meeting the needs of its users and to help us make improvements.</p> <p>Google Analytics stores information about:</p> <ul style="list-style-type: none"> the pages you visit on the site

			<ul style="list-style-type: none"> • how long you spend on each page • how you got to the site • what you click on while you're visiting the site <p>For further information on Google Analytics cookies, please visit Google Analytics Cookie Usage on Websites or view the Google Privacy Policy.</p>
_gat	Analytics	10 mins	Google Analytics, see above
_gat_tNet	Analytics	10 mins	Google Analytics, see above

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

7. Log 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.

8. 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.

9. 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.

10. Data Security

Highgrade Recruitment Ltd takes every precaution to protect our users' information. The digital systems are run by Microsoft and up to date malware and software are in place. The Company will comply with the Data Protection Act by taking all reasonable steps to ensure the accuracy and confidentiality of such information.

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 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 Claire James at claire@highgraderecruitment.com

11.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.

12.Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact:

claire@highgraderecruitment.com

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