

## Privacy Policy – BDL Recruitment Ltd

**Policy version:** 30th July 2021

www.bdlrecruitment.com is provided by BDL Recruitment LTD trading BDL Recruitment Limited (**'we', 'our' or 'us'**). We are the controller of personal data obtained via our website, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your **personal data**) in connection with your use of our website. It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (**UK GDPR**). We are also subject to the EU General Data Protection Regulation (**EU GDPR**) in relation to goods and services we offer to individuals in the European Economic Area (**EEA**).

This privacy policy is divided into the following sections:

- What this policy applies to
- Personal data we collect about you
- How your personal data is collected
- How and why we use your personal data
- Marketing
- Who we share your personal data with
- How long your personal data will be kept
- Transferring your personal data out of the UK and EEA
- Cookies
- Your rights
- Keeping your personal data secure
- How to complain
- Changes to this privacy policy
- How to contact us

### **What this policy applies to**

This policy relates to how we collect personal data from you - in person, by telephone, text or email and/or via our Website.

## **Personal data we collect about you**

The personal data we collect about you depends on the particular activities carried out. We will collect and use the following personal data about you:

- your name and contact information, including email address and telephone number and company details if applicable
- information to check and verify your identity, eg your date of birth
- your gender, if you choose to give this to us
- your billing information, transaction and payment card information
- your personal or professional interests
- your professional online presence, eg LinkedIn profile
- Information about how you use our website, IT, communication and other systems

We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below.

## **Personal data provided by you**

As part of the recruitment process, we may ask you for further personal information in order to perform our services. We may request the following from you:

- Name
- Address
- CV (including employment history)
- References
- Details of education
- Next of Kin
- Anything specific requested by a potential employer

The legal basis for us collecting and holding this data is legitimate business interest and we will hold this data in line with our retention policy.

## **Third Parties**

We may also collect data from third parties including but not limited to:

- LinkedIn
- Job Boards
- Efinancialcareers.com

- References
- Referrals

The legal basis for us collecting and holding this data is a legitimate business interest and we will hold this data in line with our retention policy. Once we have received your personal data from a third party source, we will always request your consent in order to keep the data. If consent is not given by you, we will immediately erase the data. Should you consent to our holding your data on file, our legal basis will be legitimate business interest.

We will not send any information to any third party (unless required by law or as part of our internal processes) prior to gaining your consent.

Prior to sending your CV to a potential client, we will send your CV to an outsourced CV formatting service which may be outside of the EEA.

Should we find a role for you, we may also request the following information:

- Bank details
- DBS
- Credit Check
- Passport check

The legal basis for us collecting and holding this data is contractual in order to carry out our services under a contract for service or contract of service or for legal purposes.

### **How your personal data is collected**

We collect most of this personal data directly from you—in person, by telephone, text or email and/or via our website. However, we may also collect information:

- from publicly accessible sources, eg Companies House or HM Land Registry
- directly from a third party, eg:
  - sanctions screening providers
  - credit reference agencies
  - customer due diligence providers
- from a third party with your consent
- from cookies on our website—for more information on our use of cookies, please see our cookie policy
- via our IT systems.

We collect personal data from you:

- directly, when you enter or send us information, such as when you, and

- indirectly, such as your browsing activity while on our website; we will collect information indirectly using the technologies explain in the section on '**Cookies**' below.

### How and why we use your personal data

We collect basic personal information relating to our recruitment services. We ask for more detailed information as part of the recruitment process to assess your eligibility for a role, including previous work experience and geographic location.

Under data protection law, we can only use your personal data if we have a valid reason, eg:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see '**How to contact us**' below).

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract
Conducting checks to identify you and verify your identity or to help prevent and detect fraud against you or us	To comply with our legal and regulatory obligations and for our legitimate interests or those of a third party, ie to minimise fraud that could be damaging for you and/or us
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: <ul style="list-style-type: none"> <li>- to comply with our legal and regulatory obligations</li> <li>- in other cases, for our legitimate interests or those of a third party, ie to protect our business, interests and rights or those of others</li> </ul>
Customise our website and its content to your particular preferences based on a record of your selected preferences or on your use of our website	Where we are not required to obtain your consent and do not do so, for our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service to you at the best price

What we use your personal data for	Our reasons
Communications with you not related to marketing, including about changes to our terms or policies or changes to the services or other important notices	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>- to comply with our legal and regulatory obligations</li> <li>- in other cases, for our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best service to you at the best price</li> </ul>
Protecting the security of systems and data	<p>To comply with our legal and regulatory obligations</p> <p>We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests or those of a third party, ie to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us</p>
Updating and enhancing customer records	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>- to perform our contract with you or to take steps at your request before entering into a contract</li> <li>- to comply with our legal and regulatory obligations</li> <li>- where neither of the above apply, for our legitimate interests or those of a third party, eg making sure that we can keep in touch with our customers about existing orders and new products</li> </ul>
Disclosures and other activities necessary to comply with legal and regulatory obligations that apply to our business, eg to record and demonstrate evidence of your consents where relevant	To comply with our legal and regulatory obligations
Marketing our services to existing and former customers	<p>For our legitimate interests or those of a third party, ie to promote our business to existing and former customers</p> <p>See <b>'Marketing'</b> below for further information</p>
External audits and quality checks, eg for the	For our legitimate interests or a those of a third

What we use your personal data for	Our reasons
audit of our accounts	party, ie to maintain our accreditations so we can demonstrate we operate at the highest standards
<p>To share your personal data with members of our group and third parties in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency</p> <p>In such cases information will be anonymised where possible and only shared where necessary</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> <li>- to comply with our legal and regulatory obligations</li> <li>- in other cases, for our legitimate interests or those of a third party, ie to protect, realise or grow the value in our business and assets</li> </ul>

See '**Who we share your personal data with**' for further information on the steps we will take to protect your personal data where we need to share it with others.

## Marketing

We may use your personal data to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing information. However, where consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at [info@bdlrecruitment.com](mailto:info@bdlrecruitment.com)
- using the 'unsubscribe' link in emails

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell it with other organisations for marketing purposes.

For more information on your right to object at any time to your personal data being used for marketing purposes, see '**Your rights**' below.

## Who we share your personal data with

As a recruitment agency our role is to share candidate information with prospective employers with your consent. Outside of this, we will only share personal information with others when we are legally permitted to do so. We do not sell your data to any third parties.

Collection of data alone does not permit us to send information third parties. In order to perform our recruitment services, we will ask for your permission in order to share information to third parties as part of the recruitment process, including passing candidate details to prospective employers. We

may also share your details with our accounts, governmental bodies and HMRC and any other professional body if so required.

We routinely share personal data with:

- third parties we use to help deliver our services to you, eg payment service providers; and
- other third parties we use to help us run our business, eg website hosts and website analytics providers.

We or the third parties mentioned above may occasionally also need to share personal data with:

- external auditors, eg in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations
- professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations
- other parties in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

### **How long your personal data will be kept**

We will not keep your personal data for longer than we need it for the purpose for which it is used.

We have a legitimate business interest to keep your personal information securely stored for as long as we need it to provide you with the services you want from us.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Our standard retention period for potential candidate data is 7 years.

When deciding what the correct time is to keep the data, we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **Transferring your personal data out of the UK**

The EEA, UK and other countries outside the EEA and the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to share your personal data to countries outside the UK and EEA. In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

Under data protection laws, we can only transfer your personal data to a country outside the UK/EEA where:

- in the case of transfers subject to UK data protection law, the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an ‘**adequacy regulation**’) further to Article 45 of the UK GDPR
- in the case of transfers subject to EEA data protection laws, the European Commission has decided that the particular country ensures an adequate level of protection of personal data (known as an ‘**adequacy decision**’) further to Article 45 of the EU GDPR
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you, or
- a specific exception applies under relevant data protection law

Where we transfer your personal data outside the UK we do so on the basis of an adequacy regulation or (where such is not available). In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we use to transfer personal data internationally will be notified to you in accordance with the section on ‘**Change to this privacy policy**’ below.

### **Cookies**

A cookie is a small text file which is placed onto your device (eg computer, smartphone or other electronic device) when you use our website. We use cookies on our website.

For further information on cookies, please see our [Cookie Policy](#).

### **Your rights**

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your personal data	The right to be provided with a copy of your personal data
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, eg if you contest the accuracy of the data



Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object to use	The right to object:  —at any time to your personal data being used for direct marketing (including profiling)  —in certain other situations to our continued use of your personal data, eg where we use your personal data for our legitimate interests.
Not to be subject to decisions without human involvement	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you  We do not make any such decisions based on data collected by our website.

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see ‘**How to contact us**’ below). You may also find it helpful to refer to the [guidance from the UK’s Information Commissioner](#) on your rights under the UK GDPR.

If you would like to exercise any of those rights, please email, call or write to us—see below: ‘**How to contact us**’. When contacting us please:

- provide enough information to identify yourself and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates.

### **Keeping your personal data secure**

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **How to complain**

Please contact us if you have any queries or concerns about our use of your information (see below ‘**How to contact us**’). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner.

The Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

### **Changes to this privacy policy**

We may change this privacy policy from time to time—when we make significant changes we will take steps to inform you.

### **How to contact us**

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

BDL Recruitment LTD
Bollin House Bolline Walk Wilmslow SK9 1DP  info@bdlrecruitment.com  <i>07985 476 736</i>