

How we handle your data

At Agency Bell we need your personal information to help find you a job. And we need it to contact you when we find a great role. But making sure you stay in control of your data is really important to us.

To show you how we use your data, we've put together this document here: <http://www.agencybell.co.uk/your-data-1/>. It sets out how and when we use your information, as well as your rights.

Take a look here: <http://www.agencybell.co.uk/your-data/>

Or, for our more comprehensive Privacy Notice, carry on reading below.

PRIVACY NOTICE for Candidates

Agency Bell Ltd (or "We", because that's less wordy) take protecting and respecting your privacy very seriously.

The General Data Protection Regulation (GDPR) (or "Regulation (EU) 2016/679" to its friends) is a new regulation which replaces the old Data Protection Regulation (the dweeby "Directive 95/46/EC"). The aim of the new regulation is to harmonise data protection legislation across the EU, better protecting individual privacy and providing a strict framework within which commercial organisations (you know, like us) can legally operate.

And yes, even though the UK is planning to leave the EU in March 2019, the GDPR will still apply here from 25th May 2018. Plus the Government intends for the GDPR to continue in UK law even after Brexit and has also introduced a Data Protection Bill to replace the current Data Protection Act in due course. So it's here to stay (and we think it's a good thing).

This Privacy Notice outlines the shiny new rights set out under the GDPR, which will apply once the GDPR becomes law on 25th May 2018.

So if you want the full lowdown on our views and practices around your personal data, pop the kettle on and keep on reading.

For the purposes of data protection legislation in force from time to time, the data controller is Agency Bell Ltd, 29 Fairfax Road, Teddington, TW11 9DJ

Who we are and what we do

We are a recruitment agency (and a pretty good one, too), and a recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). To find candidates jobs, we collect personal data of different groups of people, including;

- Prospective and placed candidates for permanent or temporary roles;
 - Prospective and live client contacts;
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- Supplier contacts to support our services;
- Employees, consultants, temporary workers;

The reason we collect information about you is to carry out our core business and related activities. It'd be pretty tough without it.

Information you give to us or we collect about you

This is the basic information about you that you give us, normally by filling in forms on our site www.agencybell.co.uk (our site) or by phone, e-mail or otherwise (but not Snapchat, could never get used to Snapchat).

This information includes everything you provide when you register to use our site, to enter our database, subscribe to our services, attend meetings or events with us, talk to us online or report a problem with our site.

The information you give us or we collect about you may include your name, address, private and corporate e-mail address and phone number, passport, visa information, financial information, health information, information about criminal convictions, compliance documentation and references verifying your qualifications and experience and your right to work in the UK, curriculum vitae and passport photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website. Which sounds like a lot, but that's everything we need to place you in the best jobs. Without it, we're a little stuck.

Information we collect about you when you visit our website.

When you visit our site we will automatically collect the following information:

Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information if applicable, browser type and version, operating system and platform;

information about your visit, including the URL through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

Information we obtain from other sources.

As recruiters we also collect some information from other places, such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, and personal recommendations. That helps to ensure we put your best foot forward when we submit you for a role.

We will include a link to our privacy notice in our email footers and on our website and on our registration form, which we issue to candidates during the registration process. We'll tell you that we hold personal data about you and what we plan to use it for.

We sometimes work closely with third parties including, business partners, sub-contractors in technical, professional, administrative, payment and other services, advertising networks, analytics providers, search information providers, credit reference agencies, or professional advisors. As a result we might receive information about you from them for the purposes of our recruitment services and extra support services.

Purposes of the processing and the legal basis for the processing

We use the information we collect in the following ways:

To meet any contracts we plan to enter into (or have already entered into) between you and us, and to provide you with the information, products and services that you ask us for (or we think will be of interest to you because it is relevant to your career or to your organisation).

To provide you with extra info about other services we offer that we think you might like because they're similar to other things you've already purchased, received, or asked us about.

The very core of what we do is introduce our candidates to our clients for the purpose of temporary or permanent engagement. Obviously. However, we also support individuals throughout their career, and help businesses with all of their resourcing needs and strategies.

Our legal basis for processing personal data is our **legitimate business interests** (which we describe in a bit more detail below), but we also rely on **contract, legal obligation** and **consent** for specific uses of data.

We will rely on contract when there's, well, a contract. For instance if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation. Simple.

We will rely on legal obligation if we are legally required to hold information on you.

Then we will sometimes rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. So that might be when we want permission to introduce you to a client (if you are a candidate), for instance.

Our legitimate business interests

Our legitimate interests in collecting and retaining your personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. To do that, we of course need to share the personal data of our candidates with our clients and vice versa. It's a pretty essential part of the process.

To support our candidates' career dreams and our clients' resourcing needs we need a database of candidate and client data containing historical information as well as current resourcing requirements.

Then to maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts who are interested in working with us. It's how we help the right people to meet the right people.

Consent

Whenever we want or need to rely on consent to lawfully process your data we will get in touch and request your consent orally, by email or by an online process. This will be consent for a specific activity (such as checking you're happy for us to put you forward for a role), and we'll record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time – just get in touch and let us know.

Other uses we will make of your data:

- Use of our website;

We will use this information:

- to look after our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site and make sure that content is presented in the best way for you and for your computer;
- to let you participate in interactive features of our service, when you choose to do so;
- to help us keep our site safe and secure;
- to measure or understand how well our advertising is doing, and to deliver relevant advertising to you;
- to suggest and recommend to you and other users of our site any goods or services that may interest you or them.

We do not undertake automated decision making or profiling. Instead we use our computer systems to search and identify personal data in accordance with parameters set by a person, and a person will always be involved in the decision-making process. We're a recruitment firm, so *of course* we're powered by people.

Cookies

Our website uses cookies to distinguish you from other users. This helps us to provide you with a better experience while you browse and also allows us to improve our site.

Disclosure of your information inside and outside of the EEA

We're not part of a group, so we never share your information with other group members either in the EEA or outside of the EEA.

The nature of our work does mean we need to share some of your information with selected third parties:

- clients; in order to introduce candidates to them.
- suppliers; such as providers of essential administration tools so that we can keep organised, for example Dropbox and Google Sheets; email marketing specialists so that we can get an occasional marketing message to you most efficiently; or providers of online forms so that you can get your details to us quickly and easily.
- business partners and subcontractors; this includes payment and other financial service providers and administrators to help us meet performance and compliance obligations of any contract we enter into with them or you
- analytics and search engine providers that help us improve our site;
- credit reference agencies, our insurance broker, compliance partners and other subcontractors to assess your suitability for a role where this is a condition of us entering into a contract with you.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Agency Bell Ltd. or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets. (But we aren't planning on retiring any time soon).
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of supply of services and other agreements; or to protect the rights, property, or safety of Agency Bell Ltd., our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- If we have been asked to assist the Government or our regulators in any investigations or initiatives, for example HMRC or the Information Commissioner's Office.

The lawful basis for the third party processing will include:

- Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- satisfaction of their contractual obligations to us as our data processor;
- for the purpose of a contract in place or in contemplation;
- to fulfil their legal obligations.

Where we store and process your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA as part of our recruitment services. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, transmitting information via the internet can never be completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Retention of your data

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it, and as long as you're happy for us to have it. That's why we have a data retention notice and run data routines to remove data that we no longer have a legitimate business interest in keeping.

We do the following to try to ensure our data is accurate:

Our database enables you to manage your data and to review whether the details we hold about you are accurate.

Before we submit you for a role, we check that we have accurate information about you. Then we keep in touch, checking in with you occasionally so that you can let us know of changes to your personal data (and update us on any big changes so we've got the best chance of finding you a role).

We keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:

- the nature of the personal data;
- how accurate we think it is;
- our legal obligations;
- whether an interview or placement has been arranged; and
- our recruitment expertise and knowledge of the industry by country, sector and job role.

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless you ask us to.

For your information, pseudonymised data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

Your rights

You have the right to ask us not to use your personal data for marketing. We will usually inform you (before collecting your data) if we intend to use your data for such purposes. And the same if we intend to disclose your information to any third party for such purposes (which we've never done yet). Whatever happens, we will always collect express consent from you if legally required prior to using your personal data for marketing purposes.

You can opt in or out of such marketing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at myinfo@agencybell.co.uk.

Our site may occasionally contain links to and from partner networks, advertisers and affiliates. If you follow a link to another site, they will have their own privacy policies, so we do not accept any responsibility or liability for these policies. It's always best to check these policies before you submit any personal data to these websites.

The GDPR provides you with the following rights. To:

- **Request correction** of the personal information that we hold about you. That means you can correct or complete any of the data we hold, at any time.
- **Request erasure** of your personal information. That means you can ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes (not that we do much of that).
- **Request the restriction of processing** of your personal information. That means you can ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party in certain formats, if practicable.
- **Make a complaint** to a supervisory body. In the UK that's the Information Commissioner's Office, which can be contacted through this link: <https://ico.org.uk/concerns/>

Access to information

The Data Protection Act 1998 and the GDPR give you the right to see what information is held about you. We also encourage you to get in touch and check that your data is accurate and complete.

Your right of access can be exercised in accordance with the Act (and the GDPR once it is in force).

To start this process, a subject access request should be submitted to myinfo@agencybell.co.uk.

Changes to our privacy notice

If and when we change our privacy notice in the future, we'll always post it on this page and, where appropriate, notify you by e-mail. Please check back frequently to see any updates or changes.

Contact

We're more than happy to receive questions, comments and requests about this privacy notice – simply drop us an email to myinfo@agencybell.co.uk.