

Company Name:	Inspire Resourcing Ltd/Inspire Permanent Resourcing Ltd ('the Company')
Company Contact details:	Kirsty Gascoigne – Data Protection Officer
Topic:	Data protection
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The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including special category 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.

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1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company will collect your personal data (which may include special category 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
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- 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;

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 personal data 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 special category 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 or other payment intermediaries whom we may introduce you to
- Pension providers

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
- Date of birth
- Contact details, including telephone number, email address and home address
- National insurance no.
- Experience, training and qualifications
- CV
- Bank details

Special Category data:

- Disability/health conditions relevant to the role
- Criminal conviction if unspent
- Nationality - ID/RTW documentation

Source of the personal data: The Company may have sourced your personal data/special category data:

- A registration form
- Our website
- A recommendation
- From jobs boards or LinkedIn
- A former employer
- A referee whose details you previously provided to us
- Cookies

3. 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.

We must also keep your RTW records, 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.

Where the Company has obtained your consent to process your personal and special category data, we will do so in line with our Retention Policy. 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 and special category data. Please note that our CRM system backs up files for 30 days after erasure.

4. 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 special category data you have the right to withdraw that consent at any time by contacting Kirsty Gascoigne, the Data Protection Officer at kirsty@inspireresourcing.co.uk and 79 Saltergate, Chesterfield, S40 1JS. 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.

5. Automated decision-making

There is an element of automated decision making as the Company used job titles, location, and skills to help us search for candidates within our database, however, this is not wholly automated or without intervention.

6. 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.

By using the Company website you may receive first party Cookies on your computer or device. First party Cookies are only used by the Companies website provider, Bwar. By using the Company website you may also receive third party Cookies on your computer or device. Third party Cookies are those placed by Websites, services and/or parties other than the Company or website provider, Bwar.

All Cookies used on the Company website are used in accordance with Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a prompt “By continuing to use the site, you agree to the use of Cookies”. By consenting to the use of Cookies you are enabling the best possible experience on the website. You may deny consent to the placing of Cookies, however, certain features may not function fully or as intended. You will be given the opportunity to allow only first party Cookies and block third party Cookies.

1P_JAR	.google.com	Third party cookies
	CONSENT	.google.com
	NID	.google.com
	PHPSESSID	inspire-resourcing.co.uk

7. Log Files

We may 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 contains 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

The Company takes every precaution to protect our users’ information; all information is stored electronically on a CRM that is accessed over a TSL/SSL connection, requires user permissions, password control, data security processes and is hosted by ISO 27001 certified partners.

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 Kirsty Gascoigne kirsty@inspireresourcing.co.uk

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: Kirsty Gascoigne at kirsty@inspireresourcing.co.uk or 79 Saltergate, Chesterfield, S40 1JS.

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.

Retention Policy

Under the GDPR, there are general obligations to minimise the processing of personal data and to retain personal data only for so long as necessary for the purpose or purposes for which it was collected. Data retention periods will, however, be affected by other legal requirements. For example, employment law and tax law both include minimum data retention requirements. There are also a range of sector-specific laws and codes of practice affecting data retention.

Some categories of data will need special treatment. For example, data disclosed by third parties under confidentiality agreements will often be subject to specific contractual treatment rules. Similarly, personal data with respect to which the organisation is a processor (as opposed to a controller) will be subject, under a GDPR-compliant data processing agreement, to deletion obligations after the completion of the relevant services.

Data	Legal Basis	Length to time to retain
A CV sourced from a jobboard and uploaded onto our CRM	Legitimate interest	30 days
Retaining CV after initial conversation when they are looking for work	Legal obligation (conduct regulations)	1 year
Retaining CV after initial conversation when they are not looking for work	If consent not gained this data will be deleted	0
A completed application form at registration including RTW documentation	Consent, legal obligation, legitimate interest and contractual requirement	2 years

CV's and application from when a candidate has been submitted for a role or been in a temporary assignment	Legitimate interests in line with limitation period. RTW, NI, references and contact details will be deleted after 2 years unless consent is regained.	6 years
National minimum wage documentation and any other wage documentation including sick pay records	Legal obligation and legitimate interests (after 3 years)	6 years
Statutory maternity, paternity and adoption pay	Legal obligation	3 years
Pensions auto-enrolment	Legal Obligation	6 years