

## Privacy Notice

|                                 |   |
|---------------------------------|---|
| <b>Company Name:</b>            | Anthony James Consulting Ltd ('the Company')  |
| <b>Company Contact details:</b> | Richard Jeffreys (Director) email <a href="mailto:richard@ajc.uk.com">richard@ajc.uk.com</a> and <a href="mailto:enquiries@ajc.uk.com">enquiries@ajc.uk.com</a> |
| <b>Document</b>                 | Privacy Notice  |
| <b>Topic:</b>                   | Data protection   |
| <b>Date:</b>                    | 1 <sup>st</sup> May 2018  |
| <b>Version:</b>                 | GDPR v1.0   |

The Company is a consulting business which provides IT Services, HR Consulting and 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 the terms of the following statement.

### 1. Collection and use of personal data

#### a. Purpose of processing and legal basis

The Company has collected 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

#### b. Categories of data

The Company has collected the following personal data on you which could include one or more of the following depending on the terms of engagement and the requirements of the end client. The company will only collect the data which is required in order to process your application

Personal data:

- Name/contact details
- Date of birth

- Proof of residency
- Identification (passport/driving licence etc)
- Credit and financial checks

Sensitive personal data:

- Disability/criminal conviction

#### **c. Legitimate interest**

Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- In order to provide work finding services, our clients require us to carry out a level of vetting in line with the contract. We have a legitimate interest to process your personal data to comply with these processes which are essential to complete the services.

#### **d. Recipient/s of data**

- The Company will process your personal data and/or sensitive personal data with the following recipients:
  - The company will inform you of the third party they will be sharing the data with gaining your consent prior to sending it. This would only be the client or clients you will be applying for work through which you would have given your consent to sharing your data.
  - On this occasion your information would be shared with firms relating to your specialist area of expertise which would include one or more of the following:
  - Information Technology (IT), HR, Employee Benefits and Wealth Management

## **2. Data retention**

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time.

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 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 sensitive personal data we will do so in line with our retention policy (a copy of which is attached). 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.

## **3. 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 Richard Jeffreys [richard@ajc.uk.com](mailto:richard@ajc.uk.com) and [enquiries@ajc.uk.com](mailto:enquiries@ajc.uk.com) or representative of the controller and the data protection officer

#### **4. Automated decision-making**

The Company does not use personal data when using automated tools. Work finding activities will utilise job boards and social media such as CW Jobs, Reed, Jobserve, Linked In and our own database. When evaluating potential applicants for a role, criteria such as work skills, salary and ability to commute to the client are examples of data used. There is always human intervention throughout the recruitment process.

#### **5. Source of the personal data**

The Company sourced your personal data/sensitive personal data by the following means:

- Personal data is sourced through job boards, responses by you to adverts, third party referrals and other aspects of social media such as Linked In. When contacting you for the first time the company will advise the source of gaining your data.
- This information did come from a publicly accessible source other than those referred by a third party.

#### **6. Complaints or queries**

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Richard Jeffreys [richard@ajc.uk.com](mailto:richard@ajc.uk.com) and [enquiries@ajc.uk.com](mailto:enquiries@ajc.uk.com) or representative of the controller and the data protection officer

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.