

# Privacy Policy

## 2024

valwade  
RECRUITMENT



### INTRODUCTION

This Privacy Policy explains what we do with your personal data, whether we are in the process of introducing ourselves to you, helping you to find a job, continuing our relationship with you once we have found you a role, providing you with a service, receiving a service from you, using your data to ask for your assistance in relation to one of our Candidates, or you are visiting our website.

It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

This Privacy Policy applies to the personal data of our Website Users, Temporary Workers, Prospective Candidates, Candidates, Clients, Suppliers, and other people whom we will contact in order to find out more about our Candidates or whom they indicate is an emergency contact. It also applies to the emergency contacts of our Staff. To be clear, if you are a member of Val Wade Recruitment' Staff, you should refer to the Val Wade Recruitment' Staff Privacy Policy which is available on the Val Wade Recruitment intranet.

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR"), the company responsible for your personal data ("Val Wade Recruitment" or "us") can be found here.

It is important to point out that we may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.

If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these as well.

This Privacy Policy applies in relevant countries throughout our international network. Different countries may approach data privacy in slightly different ways and so we also have country-specific parts to this Privacy Policy. You can find country-specific terms for your jurisdiction here. This allows us to ensure that we're complying with all applicable data privacy protections, no matter where you are.

### HOW TO USE THIS PRIVACY POLICY

This Privacy Policy tells you a few things about how we use your personal data, and perhaps more importantly, what your rights are in relation to this (you have, for example, the right to ask us to delete or confirm what information that we hold about you at any time, withdraw any consents that you have given and/or lodge a complaint with supervisory authority if you are not happy about something we have done).

The Privacy Policy is divided into a short-form "at a glance" section and a long-form section.

The "at a glance" section is just a few short pages providing you with an overview under the following headings:

- What kind of personal data do we collect?
- How do we collect your personal data?
- How do we use your personal data?
- Who do we share your personal data with?
- How do we safeguard your personal data?
- How long do we keep your personal data for?
- How can you access, amend or take back the personal data that you have given to us?
- How do we store and transfer your data internationally?
- Who is responsible for processing your personal data when you access the Val Wade Recruitment website

After that, there is a long-form section covering each of these areas in more detail. If you want to know more about a particular area, you can simply click-through this document: we have provided hyperlinks in the "at a glance" section to take you to the relevant part of the long-form section.

If you want to go back to the "at a glance" section, simply scroll up – both the "at a glance" section and the long-form section are contained in this same document.

This Privacy Policy also contains a number of defined terms, so we have included a glossary at the end of this document. If you are unsure what any of these defined terms means, you can simply click on the term and a hyperlink will take you to the relevant part of the glossary.

This Privacy Policy is divided into different sub-sections for each of the different categories of people who may need to read it (for example, under the "What kind of personal data do we collect?" section, there are "Candidate" and "Website User" sub-sections, as well as sections for the other types of people to whom this Privacy Policy applies). The Privacy Policy contains different information depending on what section you are looking at, so please make sure you are looking at the correct section.

### SHORT FORM "AT A GLANCE" SECTION

What kind of personal data do we collect?

**CANDIDATE DATA:** In order to provide the best possible employment opportunities that are tailored to you, we need to process certain information about you. We only ask for details that we think will genuinely help us to help you, such as your name, age, contact details, education details, employment

history, emergency contacts, immigration status, financial information (where we need to carry out financial background checks), and social security number (and of course you may choose to share other relevant information with us). Where appropriate and in accordance with local laws and requirements, we will also collect information related to your health, diversity information or details of any criminal convictions.

To the extent that you access our website or click through any links in an email from us, we will also collect certain data from you.

**PROSPECTIVE CANDIDATE DATA:** If we see your information online and we think that it looks like you might be interested in, or might benefit from, our services, we will collect and use such information about you to assess how we might be able to help you out and to get in touch.

To the extent that you access our website or click through any links in an email from us, we will also collect certain data from you.

**TEMPORARY WORKER DATA:** If we employ or engage you directly as a Temporary Worker, we need to process certain extra information (in addition to the information collected from Candidates) in order to ensure a smooth Temp Relationship. We only collect important information such as staff numbers or other identifiers, start dates, bank details and details of previous remuneration, pensions and benefit arrangements. Where appropriate and in accordance with local laws and requirements, we may also collect, by inference, information related to trade union membership, sexual orientation and child care or carer arrangements when you provide us with information about deductions from your salary for trade union membership or childcare vouchers or details about your emergency contact.

**CLIENT DATA:** If you are a Val Wade Recruitment Client, we need to collect and use information about you, or individuals at your organisation, in the course of providing you or offering you services such as: (i) finding Candidates who are the right fit for you or your organisation; (ii) providing you with a Managed Service Provider ("MSP") programme (or assisting another organisation to do so); (iii) providing you with Recruitment Process Outsourcing ("RPO") services (or assisting another organisation to do so); (iv) notifying you of content published by Val Wade Recruitment which is likely to be relevant and useful to you.

**SUPPLIER DATA:** We need a small amount of information from our Suppliers to ensure that things run smoothly. We need contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us).

**PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES, EMERGENCY CONTACTS AND DEPENDANTS:** In order to provide Candidates with suitable employment opportunities, to provide for certain eventualities for them and our Staff and to allow Staff to access certain benefits or employment rights, we need some basic background information. We ask for very basic contact details, so that we can get in touch with you either for a reference or because you've been listed as an emergency contact or a dependent for one of our Candidates or Staff

**WEBSITE USERS:** We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, and the times that our website is most popular. A number of elements of the personal data we collect from you are required to enable us to fulfil our contractual duties to you or to others. Where appropriate, some data, for example Candidates' social security number, are required by statute or other law in some jurisdictions. Other items will simply be needed to ensure that our relationship can run smoothly.

Depending on the type of personal data in question and the grounds on which we are processing it, should you decline to provide us with such data or ask us to stop processing it, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our relationship.

How do we collect your personal data?

**CANDIDATE DATA:** We collect your personal data either:

- From you; or
- From third parties.

In addition, to the extent that you access our website or read or click on an email from us, we will also collect certain data automatically or through you providing it to us.

**PROSPECTIVE CANDIDATE DATA:** We collect your personal data from third parties (for example via social media, professional networking, job aggregators and job site providers, and RPO or MSP suppliers where they refer you to us).

To the extent that you access our website or read or click on an email from us, we will also collect certain data automatically or through you providing it to us.

**TEMPORARY WORKERS DATA:** We collect your personal data either:

1. From you; or
2. From third parties.

In addition, to the extent that you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.

**CLIENT DATA:** We collect your personal data either:

1. From you; or
2. From third parties (e.g. our Candidates or Temporary Workers) and other limited sources (e.g. online and offline media).

In addition, to the extent that you access our website or read or click on an email from us, we will also collect certain data automatically or through you providing it to us.

**SUPPLIER DATA:** We collect your personal data during the course of our work with you.

In addition, to the extent that you access our website or read or click on an email from us, we will also collect certain data automatically or through you providing it to us.

**PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES, EMERGENCY CONTACTS AND DEPENDANTS:**

We collect your contact details only where a Candidate or a member of our Staff puts you down as their emergency contact or dependent or where a Candidate gives them to us in order for you to serve as a referee.

**WEBSITE USERS AND RECIPIENTS OF EMAILS:** We collect your data automatically via cookies when you visit our website, in line with cookie settings in your browser.

How do we use your personal data?

**CANDIDATE DATA:** The main reason for using your personal details is to help you find employment or other work roles that might be suitable for you. The more information we have about you, your skillset and your ambitions, the more bespoke we can make our service. Where appropriate and in accordance with local laws and requirements, we will also use your personal data for things like marketing our services to you, profiling and diversity monitoring. Where appropriate, we will seek your consent to undertake some of these activities.

**PROSPECTIVE CANDIDATE DATA:** We use Prospective Candidate information in order to work out whether you might be interested in, or might benefit from, our services, and if so, to assess whether and how we may be able to help you out. If we think we can help you, we will use your information to get in touch with you about our services.

**TEMPORARY WORKER DATA:** If we employ or engage you directly as a Temporary Worker, the main reason for using your personal details is to ensure the smooth running of our Temp Relationship and to comply with our contractual and other duties to each other, and to our Clients, as part of our Temp Relationship and our duties to third parties such as tax authorities and government agencies.

**CLIENT DATA:** The main reason for using information about Clients is to enable us to introduce ourselves to you and to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly. This will involve: (i) identifying Candidates who we think will be the right fit for you or your organisation; (ii) providing you with an MSP programme (or assisting another organisation to do so); (iii) providing you with RPO services (or assisting another organisation to do so); and/or (iv) providing services to your employees, such as training courses to teaching staff who work for our Clients in the education sector. The more information we have, the more bespoke we can make our service.

**SUPPLIER DATA:** The main reasons for using your personal data are to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly, and to comply with legal requirements.

#### **PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES, EMERGENCY CONTACTS AND**

**DEPENDANTS:** We use referees' personal data to help our Candidates to find employment which is suited to them. If we are able to verify their details and qualifications, we can make sure that they are well matched with prospective employers. Where a referee is being asked to give a reference based on their professional experience of a Candidate, and where we think that they may be interested in becoming a Client of ours, we may also use their details to reach out to get in touch in that alternative capacity. We use the personal details of a Candidate or Staff member's emergency contacts in the case of an accident or emergency affecting that Candidate or member of Staff. We use the personal data of the dependants or other beneficiaries of Staff to allow that Staff member to access certain benefits or employment rights

**WEBSITE USERS:** We use your data to help us to improve your experience of using our website, for example by analysing your recent job search criteria to help us to present jobs to you that we think you'll be interested in. If you are also a Candidate or Client of Val Wade Recruitment, we will use data from your use of our websites to enhance other aspects of our communications with, or service to, you.

Please note that communications to and from Val Wade Recruitment' Staff including emails will be reviewed as part of internal or external investigations or litigation where necessary.

Who do we share your personal data with?

**CANDIDATE DATA:** We will share your personal data with various parties, in various ways and for various reasons. Primarily we will share your information with prospective employers to increase your chances of securing the job you want. Unless you specify otherwise, we will also share your information with any of our group companies and associated third parties such as our service providers and selected job aggregators where we feel this will help us to provide you with the best possible service and maximise your chances of getting what you want.

If you would like to see a more detailed list of who we will share your personal data with, in appropriate circumstances, please click [here](#).

**PROSPECTIVE CANDIDATE DATA:** Where we have identified you as a Prospective Candidate we may share your information with any of our group companies and associated third parties such as our service providers in order to get in touch with you about our services.

**TEMPORARY WORKER DATA:** If we employ or engage you directly as a Temporary Worker, we may share your personal data with a number of additional parties in order to ensure the smooth running of our Temp Relationship. For example, we may share your personal data with appropriate colleagues within Val Wade Recruitment (this may include colleagues in overseas offices), with a Client and, if appropriate, medical professionals such as your GP or an occupational health specialist.

**CLIENT DATA:** We will share your data: (i) primarily to ensure that we provide you with a suitable pool of Candidates; (ii) to provide you with an MSP programme (or assist another organisation to do so); (iii) to provide you with RPO services (or assist another organisation to do so); and/or (iv) to provide services to your employees, such as training courses to teaching staff who work for our Clients in the education sector. Unless you specify otherwise, we will share your information with any of our group companies and associated third parties such as our service providers to help us meet these aims.

**SUPPLIER DATA:** Unless you specify otherwise, we will share your information with any of our group companies and associated third parties such as our service providers and organisations to whom we provide services.

#### **PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES, EMERGENCY CONTACTS AND**

**DEPENDANTS:** Unless you specify otherwise, we will share your information with any of our group companies and associated third parties such as our service providers and organisations to whom we provide services.

**WEBSITE USERS:** Unless you specify otherwise, we will share your information with providers of web analytics services, marketing automation platforms and social media services to make sure any advertising you receive from us is targeted to you.

#### **How do we safeguard your personal data?**

We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data.

#### **How long do we keep your personal data for?**

If you are a Client or a Supplier we will retain your personal data in order to provide you with services or to receive services from you, or to provide you with information about our services that we believe you may be interested in. If you have expressly indicated that you would rather we didn't retain your personal data, then we will Delete it from our Systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).

If you are a Prospective Candidate or a Candidate, and we have not had meaningful contact with you (or, where appropriate, the company you are working for or with) for a period of two years, we will Delete your personal data from our Systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation). As with Clients and Suppliers, if you have expressly indicated as a Prospective Candidate or a Candidate that you're not interested in our services, then we will Delete your personal data from our Systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).

If we employ or engage you as a Temporary Worker directly, we will ordinarily process your data throughout the course of your Temp Relationship and will then retain it for a period after we have parted ways, in accordance with the approach we take to Candidates.

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that, where necessary, we will keep a record of your communications to help us resolve any issues which you raise.

**Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.

**Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example, in some jurisdictions in order to use cookies) or consent to market to you, you may withdraw your consent at any time.

**Data Subject Access Requests (DSAR):** Just so it's clear, you have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or Delete such information. At this point we may comply with your request or, additionally do one of the following: ask you to verify your identity, or ask for more information about your request; and decline your request where we are legally permitted to do so (but we will explain why if we do so).

**Right to erasure:** In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will Delete your data.

**Right of data portability:** If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.

**Right to lodge a complaint with a supervisory authority:** You also have the right to lodge a complaint with your local supervisory authority, details of which can be found [here](#).

If your interests or requirements change, you can unsubscribe from part or all of our marketing content (for example job role emails or Val Wade Recruitment newsletters) by clicking the unsubscribe link in the email, or by updating your preferences through our preference centre on the Val Wade Recruitment website (by signing into your account or entering your email address).

If you would like to know more about your rights in respect of the personal data we hold about you, please [click here](#).

**What are cookies and how do we use them?**

A "cookie" is a bite-sized piece of data that is stored on your computer's hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. We also provide information about this in our Marketing preferences page on the Val Wade Recruitment website.

**How to reject cookies**

If you don't want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings

Most web browsers will accept cookies but if you would rather we didn't collect data in this way you can choose to accept all or some, or reject cookies in your browser's privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all our website's features. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

For more information generally on cookies, including how to disable them, please refer to [aboutcookies.org](http://aboutcookies.org). You will also find details on how to delete cookies from your computer.

## WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT?

So you're looking for a bit more insight into what data we collect about you? Here's a more detailed look at the sorts of information that we will collect. The information described below is, of course, in addition to any personal data we are required by law to process in any given situation.

**CANDIDATE DATA:** Depending on the relevant circumstances and applicable local laws and requirements, we will collect some or all of the information listed below to enable us to offer you employment opportunities which are tailored to your circumstances and your interests. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions:

- Name;
- Age/date of birth;
- Birth number;
- Sex/gender;
- Contact details;
- Education details;
- Employment history;
- Emergency contacts and details of any dependants;
- Referee details;
- Immigration status (whether you need a work permit);
- Nationality/citizenship/place of birth;
- Start date or availability date;
- A copy of your driving licence and/or passport/identity card;
- Bank details;
- Financial information (where we need to carry out financial background checks);
- Social security number (or equivalent in your country) and any other tax-related information;
- Diversity information (racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information);
- Details of any criminal convictions if this is required for a role that you are interested in applying for;
- Details about your previous and current remuneration, pensions and benefits arrangements;
- Child care or carer arrangements (for example, when you authorise a deduction from pay for childcare vouchers or when you volunteer this information);
- Sexual orientation;
- Information on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website or from links clicked on in emails from us;
- Extra information that you choose to tell us;
- Extra information that your referees choose to tell us about you;
- Extra information that our Clients may tell us about you, or that we find from other third party sources such as job sites; IP address;
- The dates, times and frequency with which you access our services; and
- Please note that the above list of categories of personal data we collect is not exhaustive.

**PROSPECTIVE CANDIDATE DATA:** If we think you might be interested in, or might benefit from, our services, we will collect limited data about you to help us assess how we might be able to assist you. This data is likely to include your name and contact details, so that we can get in touch with you. We may also collect other information about you, for example, where we have found you by searching LinkedIn or other job sites, we might collect information such as your employment history, education, qualifications, skills and interests, as well as any extra information which you have included on a profile or in a CV which you have uploaded to one of these sites.

**TEMPORARY WORKER DATA:** If we employ or engage you as a Temporary Worker directly, we will, depending on the relevant circumstances and applicable local laws and requirements, collect some or all of the information listed below (in addition to the data collected about Candidates) in order to ensure that our Temp Relationship runs smoothly and that we are able to comply with our contractual and other duties to each other, and to our Clients, as part of our Temp Relationship and our duties to third parties such as tax authorities and government agencies. In some jurisdictions, we are restricted from processing some of the data outlined below. In such cases, we will not process the data in those jurisdictions.

- Staff number/other identifier;
- Location of your employment or workplace at the Client;
- Trade union membership;
- Details of any grievance or disciplinary matters, whether brought by or against you or in which you are or have been otherwise involved;
- Details of any leave you take or request during our Temp Relationship, or sickness absence including health-related information;
- Information about your performance in your role during our Temp Relationship, including details of any bonuses or promotions you receive performance assessments and other information that relates to your employment, your interaction with colleagues and employment-related issues that arise;
- Details of travel undertaken.

A number of elements of the items listed above are required to enable us to fulfil our contractual duties to you or to others. Some, for example your social security number (or equivalent) are required by statute or other laws. Other items may simply be needed to ensure that our Temp Relationship can run smoothly, or to run our business.

Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our Temp Relationship.

**CLIENT DATA:** The data we collect about Clients is actually very limited. We generally only need to have your contact details or the details of individual contacts at your organisation (such as their names, telephone numbers and email addresses) to enable us to ensure that we can reach out to you about our services, ensure our relationship runs smoothly and in certain circumstances, provide services to your employees. We also hold information relating to your online engagement with Candidate profiles and other material published by Val Wade Recruitment, which we use to ensure that our marketing communications to you are relevant and timely. We may also hold extra information that someone in your organisation has chosen to tell us. In certain circumstances, such as when you engage with our Finance and Debt Recovery teams. If we need any additional personal data for any reason, we will let you know.

**SUPPLIER DATA:** We don't collect much data about Suppliers— we simply need to make sure that our relationship runs smoothly. We'll collect the details for our contacts within your organisation, such as names, telephone numbers and email addresses. We'll also collect bank details, so that we can pay you. We may also hold extra information that someone in your organisation has chosen to tell us. In certain circumstances, such as when you engage with our Finance and Debt Recovery teams, our calls with you may be recorded, depending on the applicable local laws and requirements.

#### **PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES, EMERGENCY CONTACTS AND DEPENDANTS:**

All we need from referees is confirmation of what you already know about our Candidate or prospective member of Staff, so that they can secure that job they really want. Emergency contact details give us somebody to call on in an emergency. To ask for a reference, we'll obviously need the referee's contact details (such as name, email address and telephone number). We'll also need these details if our Candidate or a member of our Staff has put you down as their emergency contact so that we can contact you in the event of an accident or an emergency. We will collect your date of birth, contact details and potentially some health information if a member of our Staff has put you down as a dependant or any other kind of beneficiary for a benefit connected with their employment or if a member of our Staff exercises certain employment rights. We may also be provided (by inference) with some limited information about your

sexual orientation if a member of our Staff identifies you as a spouse or partner when putting you down as a dependant, next of kin or emergency contact.

**WEBSITE USERS** We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This comprises information such as how you use our website, the frequency with which you access our website, your browser type, the location you view our website from, the language you choose to view it in and the times that our website is most popular. If you contact us via the website, for example by using the chat function, we will collect any information that you provide to us, for example your name and contact details.

#### **HOW DO WE COLLECT YOUR PERSONAL DATA?**

**CANDIDATE DATA:** We collect Candidate personal data in the following ways:

Personal data that you, the Candidate, give to us;  
Personal data that we receive from other sources; and  
Personal data that we collect automatically.  
Personal data you give to us

Val Wade Recruitment needs to know certain information about you in order to provide a tailored service. This will enable us to provide you with the best opportunities, and should save you time in not having to trawl through information about jobs and services that are not relevant to you.

There are numerous ways you can share your information with us. It all depends on what suits you.

These may include:

- Entering your details on the Val Wade Recruitment website or via an application form, as part of the registration process;
- Leaving a hard copy CV at a Val Wade Recruitment recruitment event, job fair or office;
- Emailing your CV or other information to a Val Wade Recruitment consultant or being interviewed by them;
- Applying for jobs through a job aggregator, which then redirects you to the Val Wade Recruitment website;
- Entering your personal details into a Val Wade Recruitment microsite; or
- Entering a competition through a social media channel such as Facebook or Twitter (or similar).

#### **Personal data we receive from other sources**

We also receive personal data about Candidates from other sources. Depending on the relevant circumstances and applicable local laws and requirements, this will involve personal data received in the following situations:

- Your referees may disclose personal information about you;
- Our Clients, Suppliers and other Candidates may share personal information about you with us;
- If you 'like' our page on Facebook or 'follow' us on Twitter we will receive your personal information from these sites; and
- If you were referred to us through an RPO or an MSP supplier, they may share personal information about you with us.

#### **Personal data we collect automatically**

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we will also collect your data automatically or through you providing it to us. For more information please click here.

**PROSPECTIVE CANDIDATE DATA:** We collect personal data about Prospective Candidates from third parties when we:  
Search for Prospective Candidates via third party sources, such as LinkedIn and other job sites, from which we obtain your personal information;  
Receive your personal information from Facebook or Twitter if you 'like' our Facebook page or 'follow' us on Twitter (or perform a similar interaction with us on social media); and  
Receive your personal information from an RPO or an MSP supplier if you are referred to us by them.

**TEMPORARY WORKER DATA** If we employ or engage you as a Temporary Worker directly, we collect your data (in addition to the data already collected about Candidates) in the following ways:

Personal data that you give to us; and

Personal data that we receive from other sources.

Below are some more details about each of these methods.

Personal data you give to us

Val Wade Recruitment needs to know certain information about you in order to fulfil our obligations to you, to ensure that you are properly fulfilling your obligations to us, and to ensure that we are both fulfilling our obligations to others. This information will enable us to operate a usual Temp Relationship, along with all that entails.

There are numerous ways that you can share your information with us in addition to the information you share as a Candidate. Where appropriate and in accordance with any local laws and requirements, these may include: when you complete registration forms at the beginning of our Temp Relationship; or in meetings or communications with your consultant, our HR team or other colleagues.

#### **Personal data we receive from other sources**

We also receive personal data about you from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:

if you were referred to us through a recruitment agency or other work agencies, they may have shared personal information about you with us;

information obtained about you from third party service providers who undertook background checks about you on our behalf at the start of our Temp Relationship; your colleagues may share personal information about you with us; your pension and benefits providers may share relevant personal information about you with us; and other third parties like your local tax authority may share your personal data with us.

**CLIENT DATA** We collect Client personal data in the following ways:

Personal data that we receive from you;

Personal data that we collect or receive from other sources; and

Personal data that we collect automatically.

Personal data that we receive directly from you

We both share the same goal – to make sure that you have the best staff for and at your organisation. We will receive data directly from you in two ways:

Where you contact us proactively, usually by phone or email; and/or

Where we contact you, either by phone or email, or through our consultants' business development activities more generally.

Personal data we collect via our website or through links in emails To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we will also collect your data automatically or through you providing it to us. For more information please click here.

**WEBSITE USERS:** When you visit our website there is certain information that we will automatically collect, whether or not you decide to use our services namely your IP address, the date and the times and frequency with which you access the website, the way you browse its content and other technical information. We will also collect data from you when you contact us via the website, for example by using the chat function.

We collect your data automatically via cookies, in line with cookie settings in your browser. If you are also a Candidate, a Prospective Candidates or Client of Val Wade Recruitment, we will use data from your use of our websites to enhance other aspects of our communications with or service to you. If you would like to find out more about cookies, including how we use them and what choices are available to you.

#### **HOW DO WE USE YOUR PERSONAL DATA?**

Having obtained data about you, we then use it in a number of ways.

**CANDIDATE DATA:** We generally use Candidate data in five ways:

- Recruitment Activities;
- Marketing Activities;
- Equal Opportunities Monitoring; and
- To help us to establish, exercise or defend legal claims.

In appropriate circumstances, we also use Candidate data for Profiling

Here are some more details about each:

#### **Recruitment Activities**

Obviously, our main area of work is recruitment – connecting the right Candidates with the right jobs. We've listed below various ways in which we will use and process your personal data for this purpose, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.

- Collecting your data from you and other sources, such as LinkedIn;
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment;
- Providing you with our recruitment services and to facilitate the recruitment process;
- Assessing data about you against vacancies which we think may be suitable for you;
- Sending your information to Clients, in order to apply for jobs or to assess your eligibility for jobs;
- Enabling you to submit your CV, apply online for jobs or to subscribe to alerts about jobs we think may be of interest to you;
- Allowing you to participate in specialist online training;
- Allowing you to participate in the interactive features of our services, when you choose to do so;
- Carrying out our obligations arising from any contracts entered into between us;
- Carrying out our obligations arising from any contracts entered into between Val Wade Recruitment and third parties in relation to your recruitment;
- Facilitating our payroll and invoicing processes;
- Carrying out customer satisfaction surveys;
- Verifying details you have provided or to request information (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws);
- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties;
- Processing your data to enable us to send you targeted, relevant marketing materials or other communications which we think are likely to be of interest to you; and

We will use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not happy about this, in certain circumstances you have the right to object. Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements.

#### **Marketing Activities**

We will periodically send you information that we think you may find interesting, or to ask for your help with connecting other Candidates with jobs. In particular, we will to use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive. To:

- enable us to develop and market other products and services;
- market our full range of recruitment services (permanent, temporary, contract, outplacement, MSP programmes and RPO services) to you;
- send you details of reports, promotions, offers, networking and client events, and general information about the industry sectors which we think might be of interest to you;
- display promotional excerpts from your details on Val Wade Recruitment's website as a success story (only where we have obtained your express consent to do so); and provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with Val Wade Recruitment.

We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing of our services to you through digital channels) and, depending on the situation, we'll ask for this via an

opt-in or soft-opt-in (which we explain further below). Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements.

Soft opt-in consent is a specific type of consent which applies where we have obtained your contact details from an occasion when you previously engaged with us (for example by submitting a job application or CV, or registering a vacancy to be filled), and we are e-marketing other recruitment-related services of our own. Under 'soft opt-in' consent, we will take your consent as given unless or until you object or opt out (and we will remind you of your right to do this in each e-marketing message that we send to you). For most people, this is beneficial as it allows us to provide you with information that we think will be of interest to you and suggest other jobs to you alongside the specific one you applied for, significantly increasing the likelihood of us finding you a new position.

For other types of e-marketing, we are required to obtain your explicit consent. If you want to know more about how we obtain consent, please click here. If you are not happy about our approach to marketing, you have the right to opt out or withdraw your consent at any time and can find out more about how to do so here. Nobody's perfect, even though we try to be. We want to let you know that even if you have opted out from our marketing communications through our preference centre, it is possible that your details may be recaptured through public sources in an unconnected marketing campaign. We will try to make sure this doesn't happen, but if it does, we're sorry. We'd just ask that in those circumstances you opt out again.

All our marketing is based on what we think will serve our Clients and Candidates best, but we know we won't always get it right for everyone. We will use your data to show you Val Wade Recruitment adverts and other content on other websites, for example Facebook. If you do not want us to use your data in this way, please turn off the "Advertising Cookies" option (please refer to our Cookies Policy). Even where you have turned off advertising cookies, it is still possible that you may see a Val Wade Recruitment advert, but in this case it won't have been targeted at you personally, but rather at an anonymous audience.

#### **Equal opportunities monitoring and other sensitive personal data**

We are committed to ensuring that our recruitment processes are aligned with our approach to equal opportunities. Some of the data we will (in appropriate circumstances and in accordance with local law and requirements) collect about you comes under the umbrella of "diversity information". This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background. This diversity information is what is called 'sensitive' or 'special category' personal information and slightly stricter data protection rules apply to it.

Where appropriate and in accordance with local laws and requirements, we'll use this information on an anonymised basis to monitor our compliance with our equal opportunities policy. We will also disclose this (suitably anonymised where relevant) data to Clients (including to their internal or external auditors) where this is contractually required or the Client specifically requests such information to enable them to comply with their own employment processes.

We will collect other sensitive/special category personal data about you such as health-related information or religious affiliation if this is appropriate in accordance with local laws. In such circumstances we'll use this information to comply with employment rights and obligations, such as to calculate entitlement to annual leave or in order to make reasonable adjustments for Candidates or Temporary Workers. If you would like to know more about the legal basis under which we process this "sensitive" or special category personal information, please click here.

We may also collect details of any criminal convictions if appropriate in accordance with local laws. In these circumstances, we are required to obtain your explicit consent in order to do so. We will ask for such consent by offering you an opt-in. This means that you have to explicitly and clearly tell us that you agree to use collecting and using this information.

In more unusual circumstances, we will use your personal data to help us to establish, exercise or defend legal claims.

#### **Profiling**

Profiling is a type of processing activity which involves our use of information that we collect about you in order to build a "profile" about you. This helps us to get a better idea of what you're like and your interests, likes and dislikes, all of which enable us to provide the best possible service to you.

#### **Here's how we use profiling:**

##### **A. Personalisation**

We want to ensure we communicate with you in the best way possible, and to optimise the information we provide to you through our services, website and online presence. In order to do this, we use profiling methods which involve analysing your personal data in order to better understand you and your interests, habits and preferences. (An example of how we might do this is that when you click on something on our website, we take note of this as perhaps an indication of what you are interested in looking at.) We use profiling methods to place you and your Candidate profile into groups or segments with other Candidates, based on your interests, habits, attributes and/or preferences so that we can:

- send you personalised emails (which, for example, might reflect what we think are your preferences);
- make recommendations for editorial content that we think may be of interest to you (e.g. reports about developments in your industry);
- send you tailored or more relevant marketing communications (the contents of which may, for example, reflect how you have responded to or interacted with previous marketing communications from us).

##### **B. Shortlisting and ranking**

We may use profiling methods which involve the analysis of your personal data, and/or placing you and your Candidate profile into groups or segments based on your interests, habits, attributes and/or preferences, in order help our consultants make For example, we might run your personal data through our systems to work out as efficiently as possible how suitable you might be for a vacancy. This helps us to optimise the matching of Candidate profiles to roles, and improves the effectiveness and efficiency of the recruitment cycle.

More specifically, we may use these profiling methods so that we can:

- place you and other suitable Candidates on shortlists for particular roles based on prescribed criteria, which will allow our consultants to identify the most appropriate Candidates for roles more efficiently; and
- recommend roles to you based on how your interests, habits, attributes and/or preferences, ranked in comparison to other Candidates.

We will use profiling methods in relation to your personal data if we deem this to be necessary for our legitimate interests. If you would like to know more about what this means, please click here. If you are not happy about this, in certain circumstances you have the right to object and can find out more about how and when to do this here.

##### **C. Automated Decision Making**

As new and better technology becomes available we will use it to help you as efficiently and as effectively as possible.

We use automated or artificially intelligent systems, which may include systems provided by third parties, to analyse data we have about you and other Candidates and make decisions about you based on this data. This includes applying machine learning to Candidate personal data in order to help us come up with the best possible shortlist for a particular role. Such technology should reduce significantly the amount of time needed to consider when candidates might be the best fit for relevant jobs. This should in turn make the recruitment process much more efficient and effective, which, we hope, will improve your overall experience with us.

We use automated decision making in relation to your personal data where we deem this to be necessary for the completion of pre-contractual steps taken at your request. If you would like to know more about what this means, please click here.

**PROSPECTIVE CANDIDATE DATA:** We use Prospective Candidate data to work out whether you might be interested in, or might benefit from, our services, and to assess whether and how we might be able to assist you. If we think we can help, we will use your contact details to get in touch with you and find out if you are interested in our services (usually via email).

- In order for us to do this, we may:
- Collect your personal data;
- Store your details (and update them when necessary) on our database so that we can contact you about our services;
- Review your information to work out whether and how our services might help you; and
- Contact you about our services.

**TEMPORARY WORKER DATA** If we employ or engage you as a Temporary Worker directly, we collect your data in five principal ways: To ensure the smooth running of our Temp Relationship, including all of the activities that need to be undertaken in a usual relationship of that type, such as:

- facilitating payroll and invoicing processes, if relevant to your jurisdiction;
- determining the terms on which you work during your Temp Relationship;
- keeping a record of any promotions, salary rises or bonuses you are awarded;
- Assessing your performance;
- Where appropriate, through Equal Opportunities Monitoring;
- To help us to establish, exercise or defend legal claims; and
- To help us to help you and to understand our legal obligations if you suffer from a health condition or disability.

**CLIENT DATA:** We use Client information for:

- Recruitment Activities;
- Marketing Activities; and
- To help us to establish, exercise or defend legal claims.

Here are some more details about each:

#### **Recruitment Activities**

Obviously, our main area of work is recruitment, through: (i) providing you with Candidates; (ii) RPO services; and (iii) MSP programmes. We've listed below the various ways in which we use your data in order to facilitate this.

Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment activities; Keeping records of our conversations and meetings, so that we can provide targeted services to you;

Undertaking customer satisfaction surveys; and

Processing your data for the purpose of targeting appropriate marketing campaigns for our services.

We also provide services to your employees such as training courses to teaching staff who work for our Clients in the education sector, which will require us to use their personal data in order to grant them access to these services.

We will use your personal data for these purposes if we deem this to be necessary for our legitimate interests. If you would like to know more about what this means, please click here.

#### **Marketing Activities**

- Subject to any applicable local laws and requirements, we will not, as a matter of course, seek your consent when sending marketing materials such as our Global Skills Index to a corporate postal or email address.

To help us to establish, exercise or defend legal claims  
In more unusual circumstances, we will use your personal data to help us to establish, exercise or defend legal claims.

**SUPPLIER DATA:** We realise that you're probably busy, and don't want us to be contacting you about all sorts of things. To find the right balance, we will only use your information:

- To store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements;
- To offer services to you or to obtain support and services from you;
- To perform certain legal obligations;
- To help us to target appropriate marketing campaigns; and
- In more unusual circumstances, to help us to establish, exercise or defend legal claims.

We will not, as a matter of course, seek your consent when sending marketing messages to a corporate postal or email address.

Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements. For more information in relation to your jurisdiction, please click here.

**PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES, EMERGENCY CONTACTS AND DEPENDANTS:** We will only use the information that our Candidates or Staff give us about you for the following purposes:

If our Candidates or Staff members put you down on our form as an emergency contact, we'll contact you in the case of an accident or emergency affecting them; or if you were put down by a Staff member or Temporary Worker as a next of kin or dependant or any other kind of beneficiary, we will store your personal data to ensure the personnel records of that Staff member or Temporary Worker are correct, and use your personal data where necessary to provide employee benefits and pay remuneration and disclose your data to the relevant benefits provider.

If you were put down by a Candidate or prospective Staff member as a referee, we will contact you to get a reference or give your details to a third party to do this on our behalf. Where you are being asked to give a reference based on their professional experience of a Candidate, and where we think that you may be interested in becoming a Client of ours, we may also use your details to reach out to get in touch in that alternative capacity.

**WEBSITE USERS:** We use your data to help us to improve your experience of using our website, for example by analysing your recent job search criteria to help us to present jobs or Candidates to you that we think you'll be interested in.

If you would like to find out more about cookies, including how we use them and what choices are available to you, please click here.

#### **WHO DO WE SHARE YOUR PERSONAL DATA WITH?**

- Where appropriate and in accordance with local laws and requirements, we will share your personal data, in various ways and for various reasons, with the following categories of people:
- Any of our group companies;
- Appropriate colleagues within Val Wade Recruitment (this may include colleagues in overseas offices);
- In the case of Temporary Workers, and in limited circumstances as appropriate, medical professionals such as your GP or an occupational health specialist;
- In the case of Temporary Workers, the Client where you as a Temporary Worker are or will be working;
- In the case of Temporary Workers, prospective employers (for example, when providing a reference,



where permissible in accordance with local laws and requirements);

- Individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies;
- Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);
- Third party service providers who perform functions on our behalf (external suppliers and consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology Systems);
- Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
- Marketing technology platforms and suppliers;
- In the case of Candidates: potential employers and other recruitment agencies/organisations to increase your chances of finding employment;
- In the case of Candidates: third party partners, job boards, job platforms, job aggregators, software providers and cloud based databases where we consider this will improve the chances of finding you the right job or improving recruitment processes more generally;
- In the case of Candidates: MSP suppliers as part of our Clients' MSP programmes;
- In the case of Candidates and our Candidates' and prospective members of Staff's referees: third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws;
- In the case of Candidates and the referees of Candidates: internal and external auditors of our Clients when we are required to share this data with them upon request in order to comply with our contractual or regulatory obligations;
- In the case of Candidates: third parties helping us by developing services and processes to optimise the Candidate selection process in order to improve the quality and efficiency of recruitment services;
- If Val Wade Recruitment merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.

#### HOW DO WE SAFEGUARD YOUR PERSONAL DATA?

- We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.
- If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately.

#### HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

- If you are a Client or a Supplier we will retain your personal data in order to provide you with services or to receive services from you, or to provide you with information about our services that we believe you may be interested in. If you have expressly indicated that you're not interested in our services, then we will Delete your personal data from our Systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).

- If you are a Prospective Candidate or a Candidate, we will Delete your personal data from our Systems if we have not had any meaningful contact with you (or, where appropriate, the company you are working for or with) for one year (or for such longer period as we believe in good faith that the law or relevant regulators require us to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.
- As with Clients and Suppliers, if you have expressly indicated as a Prospective Candidate or a Candidate that you would rather we didn't retain your personal data, then we will Delete it from our Systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).
- For those Candidates whose services are provided via a third party company or other entity, "meaningful contact" with you means meaningful contact with the company or entity which supplies your services. Where we are notified by such company or entity that it no longer has that relationship with you, we will retain your data for no longer than two years from that point or, if later, for the period of two years from the point we subsequently have meaningful contact directly with you.
- When we refer to "meaningful contact", we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our online services.
- If you are a Prospective Candidate, we will consider there to be meaningful contact with you when we first contact you in relation to our services. If you are a Candidate we will consider there to be meaningful contact with you if you submit your updated CV onto our website or take part in any of our online training. We will also consider it meaningful contact if you communicate with us about potential roles, either by verbal or written communication or click through from any of our marketing communications. Your receipt, opening or reading of an email or other digital message from us will not count as meaningful contact – this will only occur in cases where you click-through or reply directly.
- If we employ or engage you as a Temporary Worker directly, we will ordinarily process your data throughout the course of your Temp Relationship and will then retain it for a period after we have parted ways. The precise length of time will depend on the type of data, our legitimate business needs and other legal or regulatory rules that may require us to retain it for certain minimum periods. For example, we may be required to retain certain data for the purposes of tax reporting or responding to tax queries. We may also retain it if it might be relevant to any potential litigation. In jurisdictions that allow it, we will generally retain personal data relating to you where necessary to enable us to provide you or a future employer with a reference.
- In determining the appropriate retention period for different types of personal data, we always consider the amount, nature, and sensitivity of the personal data in question, the potential risk of harm from unauthorised use or disclosure of that personal data, the purposes for which we need to process it and whether we can achieve those purposes by other means (in addition of course to ensuring that we comply with our legal, regulatory and risk-management obligations, as described above). For the avoidance of doubt, if you are a Temporary Worker, we will also continue to process your personal data as a Candidate through the duration of your Temp Relationship and thereafter.

#### HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO US?

- One of the GDPR's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.
- To get in touch about these rights, please contact us. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we will, where necessary, keep a record of your communications to help us resolve any issues which you raise.

- Right to object: this right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.
  - The "legitimate interests" and "direct marketing" categories above are the ones most likely to apply to our Website Users, Candidates, Temporary Workers, Clients and Suppliers. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:
    - we can show that we have compelling legitimate grounds for processing which overrides your interests; or
    - we are processing your data for the establishment, exercise or defence of a legal claim.
  - If your objection relates to direct marketing, we must act on your objection by ceasing this activity.
  - Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities (for example, in order to use cookies in certain jurisdictions), you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.
  - Data Subject Access Requests (DSAR): You may ask us to confirm what information we hold about you at any time, and request us to modify, update or Delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.
  - Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding data subject access requests and may refuse your request in accordance with such laws. For more information in relation to your jurisdiction, please click [here](#).
  - Right to erasure: You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:
    - the data are no longer necessary for the purpose for which we originally collected and/or processed them;
    - where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
    - the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
    - it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
    - if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.
  - Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding data subject right to erasure and may refuse your request in accordance with local laws. For more information in relation to your jurisdiction, please click [here](#).
  - We would only be entitled to refuse to comply with your request for one of the following reasons:
    - to exercise the right of freedom of expression and information;
    - to comply with legal obligations or for the performance of a public interest task or exercise of official authority;
    - for public health reasons in the public interest;
    - for archival, research or statistical purposes; or
    - to exercise or defend a legal claim.
  - When complying with a valid request for the erasure of data we will Delete the relevant data.
  - Right to restrict processing: You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest. The circumstances in which you are entitled to request that we restrict the processing of your personal data are:
    - where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
    - where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
    - where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.
  - If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.
  - Right to rectification: You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.
  - Right of data portability: If you wish, you have the right to transfer your personal data between data controllers. In effect, this means that you are able to transfer your Val Wade Recruitment account details to another online platform. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to another online platform. Alternatively, we will directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.
  - Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with your local supervisory authority.
  - If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), details of how to contact us can be found [here](#). Please note that we will, where necessary, keep a record of your communications to help us resolve any issues which you raise.
  - You may ask to unsubscribe from job alerts and other marketing communications from us at any time.
- It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

## WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA WHEN YOU ACCESS THE Val Wade Recruitment WEBSITE?

- You can find out which Val Wade Recruitment entity is responsible for processing your personal data and where it is located by calling the office on 0207 355 2772.

## COOKIES POLICY

### What's a cookie?

- A "cookie" is a piece of information that is stored on your computer's hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.
- Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. We also provide information about this in our Marketing preferences page on the Val Wade Recruitment website.

### How do we use cookies?

- We use cookies to do two things:
- to track your use of our website. This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website and services in response to what our visitors want and need; and
- to help us advertise jobs to you that we think you'll be interested in. Hopefully this means less time for you trawling through endless pages and will get you into the employment you want more quickly.
- Cookies are either:
- Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer; or
- Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics and for personalisation (see below).
- Cookies can also be categorised as follows:
- Strictly necessary cookies: These cookies are essential to enable you to use the website effectively, such as when applying for a job, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
- Performance cookies: These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.
- Functionality cookies: These cookies allow our website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.
- Personalisation cookies: These cookies help us to advertise details of potential job opportunities that we think may be of

interest. These cookies are persistent (for as long as you are registered with us) and mean that when you log in or return to the website, you may see advertising for jobs that are similar to jobs that you have previously browsed.

## OUR LEGAL BASES FOR PROCESSING YOUR DATA

### LEGITIMATE INTERESTS

- Article 6(1)(f) of the GDPR is the one that is relevant here – it says that we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."
- We don't think that any of the following activities prejudice individuals in any way – in fact, they help us to offer you a more tailored, efficient service, (for example, by using profiling methods to personalise your experience with us and our communications with you) so everyone's a winner! However, you do have the right to object to us processing your personal data on this basis. If you would like to know more about how to do so, please click here.
- Please note that in certain of the jurisdictions in which we operate, a different legal basis for data processing might apply in certain cases.

### CANDIDATE DATA:

- We think it's reasonable to expect that, as a Candidate, you are happy for us to collect and otherwise use your personal data to offer or provide our recruitment services to you, share that information with prospective employers and assess your skills against our bank of vacancies. Once it's looking like you may get the job, your prospective employer may also want to double check any information you've given us (such as the results from psychometric evaluations or skills tests) or to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with local laws. We need to do these things so that we can function as a profit-making business, and to help you and other Candidates get the jobs you deserve.
- We want to provide you with tailored job recommendations and relevant articles to read to help you on your job hunt. We therefore think it's reasonable for us to process your data and use profiling methods to make sure that we send you the most appropriate content and identify the most suitable opportunities for you.
- We also think that it might help with your job search if you take part in our specialist online training or some of our more interactive services, if you have the time. These are part of our service offering as a business, and help differentiate us in a competitive marketplace, so it is in our legitimate interests to use your data for this reason.
- We have to make sure our business runs smoothly, so that we can carry on providing services to Candidates like you. We therefore also need to use your data for our internal administrative activities, like payroll and invoicing where relevant.
- We have our own obligations under the law, which it is a legitimate interest of ours to insist on meeting! If we believe in good faith that it is necessary, we will therefore share your data in connection with crime detection, tax collection or actual or anticipated litigation.

### PROSPECTIVE CANDIDATE DATA:

- We think it's reasonable to assume that you are looking for employment opportunities if you have posted your professional CV information on a job board or professional networking site, and therefore that you are happy for us to collect and otherwise use your personal data to decide whether we are able to offer or provide our recruitment services to you, and to contact you in respect of those services.

#### TEMPORARY WORKER DATA:

- If we employ or engage you directly as a Temporary Worker, we consider the following to be non-exhaustive examples of processing activities that are in our legitimate interests to carry out so that we can build a successful Temp Relationship:
- for our internal administrative purposes, such as facilitating payroll and invoicing processes, if relevant to your jurisdiction;
- determining the terms on which you work during your Temp Relationship;
- keeping a record of start dates and duration of the length of assignments, hours works during assignments, and (in some jurisdictions) any promotions, salary rises or bonuses you are awarded;
- giving or receiving feedback in relation to your assignment; and
- if necessary, to assist us with establishing, exercising or defending legal claims.

#### CLIENT DATA:

- To ensure that we provide you with the best service possible, we store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations, meetings, registered jobs and placements. From time to time, we will also ask you to undertake a customer satisfaction survey. We think this is reasonable – we deem these uses of your data to be necessary for our legitimate interests as an organisation providing various recruitment services to you.

#### SUPPLIER DATA:

- We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our Suppliers. We also hold your financial details, so that we can pay you for your services. We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

#### PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:

- If you have been put down by a Candidate or a prospective member of Staff as one of their referees, we use your personal data in order to contact you for a reference. This is a part of our quality assurance procedure and so we deem this to be necessary for our legitimate interests as an organisation offering recruitment services and employing people ourselves.
- Where you are being asked to give a reference based on their professional experience of a Candidate, and where we think that you may be interested in becoming a Client of ours, we may also use your details to reach out to get in touch in that alternative capacity.
- If a Candidate or Staff member has given us your details as an emergency contact, we will use these details to contact you in the case of an accident or emergency. We are sure you will agree that this is a vital element of our people-orientated organisation, and so is necessary for our legitimate interests.

#### CONSENT

- In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.
- Article 4(11) of the GDPR states that (opt-in) consent is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her". In plain language, this means that:
- you have to give us your consent freely, without us putting you under any type of pressure;

- you have to know what you are consenting to – so we'll make sure we give you enough information;
- you should have control over which processing activities you consent to and which you don't. We provide these finer controls within our privacy preference centre; and
- you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.
- We will keep records of the consents that you have given in this way.
- We have already mentioned that, in some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you which are related to the recruitment services we provide to you as long as you do not actively opt-out from these communications.
- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding consenting to receive marketing materials. For more information in relation to your jurisdiction, please click here.
- As we have mentioned, you have the right to withdraw your consent to these activities. You can do so at any time, and details of how to do so can be found here.

#### ESTABLISHING, EXERCISING OR DEFENDING LEGAL CLAIMS

- Sometimes it will be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".
- This will arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

#### TO EXERCISE OUR RIGHTS OR CARRY OUT OUR EMPLOYMENT AND SOCIAL SECURITY LAW OBLIGATIONS

- For some Candidates, Temporary Workers and individuals whose personal data is provided by Candidates and Staff, it will sometimes be necessary for us to process your sensitive/special category personal data. Article 9(2)(b) of the GDPR allows us to do this where the processing is "necessary for the purposes of carrying out the obligations and exercising [our or your] specific rights... in the field of employment and social security and social protection law", as long as this is allowed by law.
- We process Candidates' sensitive/special category personal data for the purpose of ensuring our compliance with our equal opportunities obligations where appropriate and in accordance with local law, (for example, for some Candidates during the course of the recruitment process). We will also process the sensitive/special category personal data of individuals connected with Candidates or Staff for other reasons, for example to allow the relevant Staff member to access certain benefits or employment rights. You can find out how we process your sensitive/special category personal data under "What Kind of Personal Information Do We Collect?" above.
- In relation to the employment or engagement of Temporary Workers directly by us, we process your special categories of personal data for the purpose of ensuring our compliance with our equal opportunities obligations where this in accordance with local law, but we may also process other elements of your special categories of personal data during the course of our Temp Relationship for other reasons. For example, where appropriate and in accordance with any local laws and requirements, we may also process your medical data to enable us to provide you with adequate support if you suffer from a health condition or disability, for example by sharing medical information about you with an occupational health

specialist, in order to determine prognosis and return to work arrangements, and to assess your working capacity more generally. We may also need to process some health-related data to ensure appropriate adjustments can be made by us or our Clients during the continuance of the Temp Relationship.

- Please note that in certain of the jurisdictions in which we operate, additional rules apply to how we process your special categories of personal data.

#### **WHERE PROCESSING YOUR PERSONAL DATA IS NECESSARY FOR US TO CARRY OUT OUR OBLIGATIONS UNDER OUR CONTRACT WITH YOU, TO ENSURE THAT YOU ARE PROPERLY FULFILLING YOUR OBLIGATIONS TO US, AND TO ENSURE THAT WE ARE FULFILLING OUR OBLIGATIONS TO OTHERS**

- The relevant basis here is Article 6(1)(b) of the GDPR, which applies where processing of personal data "is necessary for the performance of a contract to which [you are] party or in order to take steps at [your] request ... prior to entering into a contract".
- CANDIDATE DATA
- We may use automated decision making to make decisions about you based on your personal data. We will only do this where this is necessary in order to fulfil a contract you have with us or one of our Clients, or where this is necessary in order to complete steps which must be taken before you can enter into such a contract.
- We think it is reasonable to assume that, as a Candidate, you are hoping to enter into an employment contract, and that by using our services you are asking us to take the necessary steps for this purpose. Such steps might include, for example, checking you meet certain requirements for a particular role. If the role is very popular, we may have to check the eligibility of a large number of potential Candidates – we may therefore use automated decision making to filter this pool of Candidates down to a more manageable number.
- Please note that in certain of the jurisdictions in which we operate, a different legal basis for data processing might apply in certain cases. For more information in relation to your jurisdiction, please [click here](#).
- TEMPORARY WORKERS
- In relation to the employment or engagement of Temporary Workers directly by us, prior to and during our Temp Relationship, we rely on this legal basis to collect and otherwise use your personal data to enable us to perform our part of our contract with you and our obligations to third parties, and to ensure that you are properly fulfilling your obligations to us.
- By way of example, we may process your bank account details and name (and other verifying information) via payroll in order to pay you in accordance with your contract. Another example may be processing data for performance or behaviour management as part of our Temp Relationship.
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#### **WHERE PROCESSING YOUR PERSONAL DATA IS NECESSARY FOR US TO CARRY OUT OUR LEGAL OBLIGATIONS**

- In relation to the employment or engagement of Temporary Workers directly by us, as well as our obligations to you under our contract, we also have other legal obligations that we need to comply with. Article (6)(1)(c) of the GDPR states that we can process your personal data where this processing "is necessary for compliance with a legal obligation to which [we] are subject".
- An example of a legal obligation that we need to comply with is our obligation to co-operate with tax authorities, including providing details of your remuneration and tax paid.