

<b>Company Name:</b>	Cameo Consultancy (Recruitment) Ltd ('the Company')
<b>Company Contact Details:</b>	Greenway House, Sugarswell Business Park, Shenington, OX15 6HW E: <a href="mailto:hello@cameoconsultancy.co.uk">hello@cameoconsultancy.co.uk</a> T: 01295 680800
<b>Document:</b>	Privacy Notice
<b>Topic:</b>	Data Protection
<b>Date:</b>	11 <sup>th</sup> May 2018
<b>Version:</b>	V1

Cameo Consultancy (Recruitment) Limited is a recruitment agency and business which provides work-finding services to clients and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a Data Controller.

The intention of this Privacy Notice is to inform you in a transparent manner, the types of personal data we require to engage with recruitment and training services. It also explains how we'll retain and process this data, along with keeping it safe.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.

When you are using the Cameo website, Cameo Consultancy (Recruitment) Ltd is the Data Controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website or email, or we may collect them from another source such as job boards. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services as a client and/or candidate, and/or information relating to roles relevant to you, we will only use your personal data in accordance with the terms of the following statement.

## 1. Why we use personal data

### a. Purpose of processing and legal basis

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. The legal bases we rely upon to offer these services to you are:

- **Consent** of the individual for one or more specific purposes
- Processing is necessary for the performance of a **contract** with the individual, or in order to take steps at the request of the individual to enter into a contract
- Processing is necessary for **compliance**, with the legal obligation that the **Company Contact** is subject to
- Processing is necessary to protect **vital interests** of the individual or another person
- Processing is necessary for the performance of a task carried out in the **public interest**, or in the exercise of official authority vested in the **Company Contact**
- Processing is necessary for the purposes of **legitimate interests**, pursued by the **Company Contact**, or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the individual which require protection of personal data

## **b. Categories of data**

The Company has collected the following personal data/corporate data:

- Name and contact details
- Company information
- CV and any supporting documentation
- Employment references
- Testing and other assessment results and reports
- Job specifications

### **Sensitive personal data:**

- National Insurance Number and other payroll details for temporary workers
- Proof of identification, for right to work verification
- Banking information and other company information pertaining to invoicing and payment processing

## **c. Legitimate interest**

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

- For work finding services
- To represent candidates for work finding services, including submittal of CV, application form and other recruitment screening documentation where applicable, at all stages of the recruitment process

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

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Prospective employers and employees (speculative and active)
- 3<sup>rd</sup> party HR Consultants acting on behalf of said prospective employer
- Skill testing and assessment providers
- Partners acting on behalf of Cameo Consultancy (Recruitment) Ltd

## **e. Statutory/contractual requirement**

Your personal data is a contractual requirement (e.g. our client may require this personal data), and/or a requirement necessary to enter into a contract. You are obliged to provide the personal data and if you do not the consequences of failure to provide the data are:

- Withdrawal from recruitment process
- Retraction of any job offer

## **2. How we collect and hold your data**

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

The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

Where the Company has obtained your consent to process your personal and sensitive data, we will do so in line with our retention policy. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal data and sensitive personal data.

Company data is captured through various channels including but not exclusive to company websites, social media activity, job boards, newspaper job adverts and articles, business networking and recommendation.

All contact information is held on a GDPR compliant Customer Relationship Management (CRM) system, to ensure all activities pertaining to your data are recorded and trackable.

## **3. How we use your personal data for marketing purposes**

We will contact you primarily with potentially suitable job opportunities and also from time to time with promotional offers and incentives. We intend to bring to your attention thought leadership, industry news and information; adding value to your job search and/or learning and development experience with Cameo Consultancy (Recruitment) Ltd. The use of secondary marketing software, such as Mailchimp and Survey Monkey are utilised to deliver this information to you.

## **4. How we use your personal data**

We hold a restrictive level of personal data, which is used from the initial stages of communication, throughout the hiring process and continued engagement/account management.

## **5. How we protect your personal data**

All company and personal data held on our CRM system is held securely and in accordance with GDPR requirements. A high level of security with strict passwords and inactive session time-outs will protect your data stored in Microsoft Azure Cloud. Data is secure, and transmissions are encrypted.

### 6. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data and sensitive personal data, you have the right to withdraw that consent at any time by contacting **Company Contact**

### 7. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact **Company Contact**

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.