

## EH20 Group – GDPR & Data Privacy Policy - 2022

The EH20 Group Limited (“EH20”) are a Recruitment Agency and Business and our Privacy Notice reflects our responsibilities when providing our services. Your privacy is important to us and we are committed to collecting, processing, storing and destroying all information in accordance with the General Data Protection Regulation, UK data protection laws and specific data protection codes of conduct.

### **Introduction**

This Privacy Notice explains what we do with your personal data, whether we are in the process of helping you find an opportunity, continuing our relationship with you once we have found you an opportunity, providing you with a service, receiving a service from you, using your data to ask for your assistance in relation to an opportunity we have 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.

This Privacy Notice applies to the personal data of our Website Users, Candidates, Clients, Suppliers, and other people whom we may contact in order to find out more about our Candidates or whom they indicate is an emergency contact.

**Website Users:** Any individual who accesses any of the EH20 websites. Our website contains links to other sites. Please be aware that EH20 is not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every website that collects personally identifiable information.

**Candidates:** Includes applicants for all roles advertised or promoted by EH20, including permanent, part-time and temporary positions and freelance roles with EH20’s Clients; as well as people who have supplied a speculative CV to EH20 not in relation to a specific opportunity. This also includes any individual who is contacted through a third party supplier such as a Job Board Company.

**Clients:** This category covers our customers, clients, and others to whom EH20 provides services in the course of its business.

**Suppliers:** Refers to partnerships and companies such as independent contractors and freelance workers who provide services to EH20. In certain circumstances EH20 will sub-contract the services it provides to Clients to third party suppliers who perform services on their behalf. In this context, suppliers that are individual contractors, freelance workers or employees of suppliers will be treated as Candidates for data protection purposes. Please note that in this context, EH20 requires Suppliers to communicate the relevant parts of this Privacy Notice (namely the sections directed at Candidates) to their employees.

Other people whom EH20 may contact – these may include Candidates’ emergency contacts and referees. We will only contact them in appropriate circumstances.

It is important to point out that we may amend this Privacy Notice 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 Notice, you may have legal rights and, where relevant, we have described these as well.

## What kind of personal data do we collect?

CANDIDATE DATA: In order to provide the best possible opportunities that are tailored to you, we need to process certain information about you. We only ask for details that will genuinely help us to help you, such as: –

- Name
- Contact details including telephone numbers, email address and postal address
- CV / Work History
- Work preferences including role, geographical area, salary
- Publicly available information, or information provided by you, in relation to professional history, educational background, employment history, skills and experience, professional licenses and affiliations, educational and professional qualifications
- Immigration status, emergency contacts and of course you may choose to share other relevant information with us.

Where appropriate and in accordance with local laws and requirements, we may also collect information including:

- Identification (Passport, Driving Licence and in some cases permits and visas)
- Date of Birth
- NI Number
- Outcome of criminal record checks and security clearance for certain roles
- Medical information
- References
- Financial information (including but not limited to payroll details and terms, HMRC data, pension scheme details, court orders and statutory payments)
- Diversity Information
- A log of our communications with you by email and telephone
- IP address

CLIENT DATA: If you are a EH20 Group Limited customer, we need to collect and use information about you, or individuals at your organisation, in the course of providing you services such as: (i) finding Candidates who are the right fit for you or your organisation;

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 AND EMERGENCY CONTACTS: In order to provide Candidates with suitable opportunities we need some basic background information. We only 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 for one of our Candidates or Staff members.

**WEBSITE USERS:** We collect a limited amount of data from our Website Users. 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 are required by statute or other laws. Other items may 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 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 relationship.

The legal bases we rely upon to offer our services to you are:

- Consent
- Legitimate interest
- Legal obligation
- Contractual obligation

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

**CANDIDATE DATA:** There are two main ways in which we collect your personal data:

1. Directly from you
2. From third parties such as other Candidates (networking / referrals) or a Job Board Company

**CLIENT DATA:** There are two main ways in which we collect your data:

1. Directly from you
2. From third parties such as our Candidates and other publicly available sources

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

**PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES SUCH AS REFEREES AND EMERGENCY CONTACTS:** We collect your contact details only where a Candidate puts you down as their emergency contact or where a Candidate gives them to us in order for you to serve as a referee.

**WEBSITE USERS:** 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 work opportunities 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 may also use your personal data for things like diversity monitoring, to establish you have the right to work, to enable us to ascertain what your needs are in terms of reasonable adjustments to enable you to perform the role sought and to attend interviews or to take aptitude tests (medical information), to put in

place contractual arrangements and documentation once a role has been secured and to pay you if placed. Where appropriate, we will seek your consent to undertake some of these activities.

**CLIENT DATA:** The main reason for using information about Clients is to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly. This may involve identifying Candidates who we think will be the right fit for you or your organisation. 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 AND EMERGENCY CONTACTS:** 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 Clients. We may also use referees' personal data to contact them in relation to recruitment activities that may be of interest to them. We use the personal details of a Candidates emergency contacts in the case of an accident or emergency affecting that Candidate.

**WEBSITE USERS:** We use your data to help us to improve your experience of using our website, for example by analysing your recent search criteria to help us to present opportunities to you that we think you'll be interested in. If you are also a Candidate or Client of EH20, we may use data from your use of our websites to enhance other aspects of our communications with, or service to, you.

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

**CANDIDATE DATA:** Primarily we will share your information with prospective Clients to increase your chances of securing the opportunity you want. We may also share your information with associated third parties such as our service providers where we feel this will help us to provide you with the best possible service.

**CLIENT DATA:** We will share your data primarily to ensure that we provide you with a suitable pool of Candidates.

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

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

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

83 Princes Street  
Edinburgh  
EH2 2ER

0131 448 1033   
info@eh20group.com   
<http://www.eh20group.com/> 

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. Our services are all hosted from a datacentre within the EEA which is ISO27001 certified. We undertake regular vulnerability scans of our website and services to ensure your data is safe

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

Your data (or, where appropriate, the data on the company you are working for or with) will be held for as long as EH20 are providing a service to you. You have control over your option to delete your database record. When requested, EH20 will remove your details from their database (all personally identifiable information will be completely removed from their systems) within 30 days (unless we believe that the law or other regulation requires us to preserve it).

How can you access, amend or take back the personal data that you have given to us?

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 we may 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, for profiling your suitability for certain roles), you may withdraw your consent at any time.

*Data Subject Access Requests (DSAR):* 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:

- we may ask you to verify your identity, or ask for more information about your request; and
- where we are legally permitted to do so, we may decline your request, 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 but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

*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.

| Privacy Information to be given to the individual:                                                                                                                                               | Where the Company collects data from the individual: | Where personal data has not been obtained from the individual |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|---------------------------------------------------------------|
| The identity and contact details of the Company and where applicable the controller's representatives and/or data champion.                                                                      | Yes (Y)                                              | Y                                                             |
| The purposes of <i>processing</i> and the legal basis for the <i>processing</i> .                                                                                                                | Y                                                    | Y                                                             |
| The legitimate interest of the <i>data controller</i> or third party, where applicable.                                                                                                          | Y                                                    | Y                                                             |
| The categories of personal data.                                                                                                                                                                 | No (N)                                               | Y                                                             |
| Recipients or categories of recipients of personal data.                                                                                                                                         | Y                                                    | Y                                                             |
| Details of transfers to third countries and the safeguards in place.                                                                                                                             | Y                                                    | Y                                                             |
| The retention period of the data or the criteria used to determine the retention period.                                                                                                         | Y                                                    | Y                                                             |
| The existence of individual's rights including the right of access, rectification, erasure, restriction of <i>processing</i> , objection to <i>processing</i> and the right to data portability. | Y                                                    | Y                                                             |
| The existence of the right to withdraw <i>consent</i> where it has been given and relied upon.                                                                                                   | Y                                                    | Y                                                             |
| The right to lodge a complaint with the Information Commissioner's Office or any other relevant <i>supervisory authority</i> .                                                                   | Y                                                    | Y                                                             |
| The source the personal data originates from and whether it came from publicly accessible sources.                                                                                               | N                                                    | Y                                                             |
| Whether the provision of personal data form part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data.                      | Y                                                    | N                                                             |
| The existence of automated decision-making, including <i>profiling</i> and information about how decisions are made, the significance and the consequences.                                      | Y                                                    | Y                                                             |

### **How do we store and transfer your data internationally?**

EH20 is a global organisation and in order for us to continue operating in this way, we may have to transfer your data internationally. In order to provide you with the best service and to carry out the purposes described in this Privacy Notice, your data may be transferred:

- to overseas Clients
- to clients who may, in turn, transfer your data internationally;
- to a cloud-based storage provider; and
- to other third parties, as referred to here.

We want to make sure that your data are stored and transferred in a way which is secure. We will therefore only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:

- by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws; or
- by signing up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the United States of America or any equivalent agreement in respect of other jurisdictions;
- transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation;
- where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer data outside the EEA in order to meet our obligations under that contract if you are a Client of ours);
- where you have consented to the data transfer.

To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the law on data protection.

### **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.



Dated – 1<sup>st</sup> of January 2022

Signed on behalf of EH20 Group by – HARRIS CAINS, MD

Signature – *H. Cains*

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