

## Terms and Privacy

This web site is operated by Rawdons & Co Ltd. Rawdons & Co Ltd are committed to protecting the privacy of our users by providing a safe environment for all our users. This Statement is to inform you how we will use any personal data which you provide through this web site and is aimed at job seekers only.

Rawdons & Co Ltd complies fully with data protection legislation which regulates the processing of information relating to you and upholds your rights in respect of your personal data. On occasion our site may contain links to other web sites over which we have no control and therefore Rawdons & Co Ltd are not responsible for the privacy policies or practices of other web sites to which you choose to link from this site. This Privacy Statement applies solely to the information we collect via this web site and does not apply to information we collect in any other fashion.

### Collection and Retention of Information

You do not have to give us any personal information in order to use the job search facilities on the Rawdons & Co Ltd web site. If you register to use the members area of the web site then you must supply some personal information such as your name, address, e-mail address, telephone number, contact information and other information from which your identity is discernible. In other areas of our web site, Rawdons & Co Ltd also collects demographic information that is not unique to you and does not reveal your identity such as your postcode, age, gender and the types of work in which you are interested this is for Rawdons & Co Ltd use only and will not under any circumstances be sold, leased or given to any third party.

If you use our facilities to build a CV to put in our database of users CV's, then you will be providing us with personal data which we will use in accordance with this statement. We strongly suggest that your CV should not contain data relating to your

1. **racial or ethnic origin**
2. **political beliefs**
3. **philosophical or religious beliefs**
4. **membership of a trade union or political party**
5. **sexual life**
6. **physical or mental health**

If your CV does contain such data, then you agree that we may retain this information and use it in accordance with this statement.

### Use of Your Information by Rawdons & Co Ltd

The use of the information we gather on the web site personal or otherwise will only be used for the purposes of enhancing the browsing experience offered by the site and to improve the services we provide.

In addition, at the time of registration or later, you may have the option to elect to receive additional electronic communications. These communications will be in the form of vacancy notifications and occasional newsletters.

We may also use any feedback (such as success stories) for promotional purposes and may contact you for further information.

## **Disclosure of Information to Others**

We do not disclose any information whether personal or otherwise to third parties except as set out below.

1. We may disclose such information to companies and individuals who have contacted with us to advertise and therefore provide candidates for positions they have made available to us and have then been posted to the web site.
2. Should you apply for a position through the web site then your information will be forwarded to the potential employer for due processing.
3. We may disclose and transfer information to a third party who acquires Rawdons & Co Ltd business, whether such acquisition is by way of merger, consolidation or purchase of our assets.

In addition, should Rawdons & Co Ltd become the subject of an insolvency proceedings, whether voluntary or involuntary, its liquidator, administrator, receiver or may sell, license or otherwise dispose of such information in a transaction approved by the court. You will be properly notified of any such event.

## **Updating or Deleting Your Information**

You may review, correct, update or change your profile information or CV at any time. Simply log into your Rawdons & Co Ltd members area account, and follow the relevant links to review your account information or CV and, if you wish, edit it with the options provided. You may also delete your CV through this method.

If you wish to delete your Rawdons & Co Ltd account at any time, please contact us at [info@rawdons.net](mailto:info@rawdons.net). A confirmation email will be sent to you when your information has been deleted.

If you opted to receive newsletters, job notification e-mails or other communications from Rawdons & Co Ltd at the time you registered, but subsequently change your mind, you may opt-out by editing your Account Profile as described above.

## **Security**

Rawdons & Co Ltd has implemented appropriate technical and organisational measures designed to ensure the security of your personal information. However the Internet is an open system and we cannot guarantee that unauthorised third parties will never be able to access or use your personal information for improper purposes.

## **Changes to Privacy Statement**

If we decide to change the content of our Privacy Statement, we will post those changes through a prominent notice on the web site so that you will always know what information we gather and how we might use that information. If at any time, you have questions or concerns about our Privacy Statement, please feel free to email us [info@rawdons.net](mailto:info@rawdons.net)

## **Use of Cookies Statement**

Rawdons & Co Ltd uses "cookies" only to help make your browsing experience more meaningful. A cookie is a text file that is either stored in your computer's memory temporarily (a "session" cookie) or

placed on your hard drive (a “persistent” cookie) by a web page server. Cookies are not used to run programmes or deliver viruses to your computer. Cookies are uniquely assigned to you and your computer and can only be read by a web server in the domain that issued the cookie to you.

The main purpose of a cookie on the Rawdons & Co Ltd web site is to tell the web server that you have returned to a specific page. For example, if you register for services, a cookie helps us to recall your specific information (such as user name, password and preferences).

We predominately use “session” cookies which are not stored on your hard drive. Session cookies expire after 30 minutes of inactivity or when you close your browser. “Session” cookies allow us to keep track of data until you have completed your search.

You may have the ability to accept or decline cookies at any time. Most web browsers automatically accept cookies, but you can modify your browser setting to decline all cookies if you prefer. If this is the case then certain areas such as the members area will not be accessible from your computer. Alternatively, you may be able to modify your browser setting to notify you each time a cookie is tendered and permit you to accept or decline cookies on an individual basis

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

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with this privacy statement. At all times we will comply with current data protection laws.

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## **1. Collection and use of personal data**

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

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

If you have opted-in we may also send you marketing information and news via email/ text. You can opt-out from receiving these at any time by clicking “unsubscribe” when you receive these communications from us.

In some cases we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

- Your consent – [You give us this by sending your CV or registering with us](#)
- Where we have a legitimate interest – [Clients / Customers](#)
- To comply with a legal obligation that we have – Audit purposes
- To fulfil a contractual obligation that we have with you

### **b. Legitimate interest**

This is where the Company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Managing our database and keeping work-seeker records up to date;
- Providing work-finding services to you and our clients;
- Contacting you to seek your consent where we need it;
- Giving you information about similar products or services that you have used from us recently;

### **c. Statutory/contractual requirement**

The Company has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements.) Our clients may also require this personal data, and/or we may need your data to enter into a contract with you. If you do not give us personal data we need to collect we may not be able to continue to provide work-finding services to you.

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

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

- Clients (whom we may introduce or supply you to)
- Former employers whom we may seek references from
- Payroll service providers who manage payroll on our behalf or other payment intermediaries whom we may introduce you to
- Other recruitment agencies in the supply chain

## **2. Information to be provided when data collected not from the data subject**

**Categories of data:** The Company has collected the following personal data on you:

*Personal data:*

- Name, address, mobile no., email
- National insurance no.
- Nationality (through right to work check)
- CV - Application

*Sensitive personal data:*

- Health information including whether you have a disability
- Criminal conviction

**Source of the personal data:** The Company sourced your personal data/sensitive personal data:

From [name] jobs boards, LinkedIn

- A former employer
- A referee whose details you previously provided to us
- Software providers who we use to support our services including
- Cookies listed in section 7

This information came from a publicly accessible source.

## **3. Overseas Transfers**

The Company will not transfer the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

#### **4. Data retention**

The Company will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time. For example, the Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep your payroll records, holiday pay, sick pay and pension's auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation. This is currently 3 to 6 years.

Where the Company has obtained your consent to process your personal sensitive personal data/specify which personal data, we will do so in line with our retention. 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/sensitive personal] data.

#### **5. 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/sensitive personal data you have the right to withdraw that consent at any time by contacting any member of our organisation who handles data protection issues and, where applicable, any representative of the controller and the data protection officer. Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where the Company will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons. I.e. HMRC / Police / Solicitors.

If you believe that any of your data that the Company processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

**You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.**

## **6. Log Files**

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

## **7. Links to external websites**

The Company's website may contain links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Company's website.

## **8. Sale of business**

If the Company's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

## **9. Data Security**

The Company takes every precaution to protect our users' information, e.g. firewalls, browser certification technology, encryption, limited access, use of passwords etc. as appropriate.

Only employees who need the information to perform a specific job (for example, consultants, our accounts clerk or a marketing assistant) are granted access to your information.

The Company uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/ the Internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/ the Internet.

If you share a device with others we recommend that you do not select the "remember my details" function when that option is offered.

**If you have any questions about the security at our website, you can email [info@rawdons.net](mailto:info@rawdons.net)**

## **10. Changes to this privacy statement**

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.

## **11. Complaints or queries**

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Managing Directors via [info@rawdons.net](mailto:info@rawdons.net)

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.