# Sauce Recruitment – Privacy Notice

## What is the purpose of this Privacy Notice?

This Privacy Notice explains how Sauce Recruitment Ltd looks after your personal data when we provide our services to you and our clients, in accordance with applicable legislation intended to protect your personal data and privacy, including the <u>General Protection Regulation and related laws</u>. We also explain what your rights are.

2018 will see one of the biggest changes to UK data privacy laws as the  $\underline{\mathbf{G}}$  eneral  $\underline{\mathbf{D}}$  ata  $\underline{\mathbf{P}}$  rotection Regulation (GDPR) is introduced across Europe on 25<sup>th</sup> May 2018.

GDPR will not change the ways we use your personal information. We have always and will continue to value all data you share with us whilst keeping it secure at all times. Whilst the law may be changing, our commitment to looking after your data stays the same.

Where we refer to "Sauce" or "we" or "the company", we mean Sauce Recruitment Ltd.

Sauce Recruitment Ltd 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.

It is important that you read this statement together with any other privacy notices we may provide on specific occasions, so you are aware of how and why we are using your personal data.

#### What is GDPR?

The General Data Protection Regulation (GDPR) is a new law coming into force across the  $\underline{\mathbf{E}}$ uropean  $\underline{\mathbf{U}}$ nion (EU). It builds upon existing data protection laws in place in the EU, and is designed to give individuals (such as candidates and workers) increased rights and transparency over their personal information by helping them understand how companies, such as Sauce Recruitment Ltd use their data, for example, for lawful purposes in the provision of recruitment services. The law also gives individuals the ability to exercise their rights such as correcting or accessing their data.

#### What impact do the changes have on you?

GDPR provides you with more transparency regarding your personal data. It strengthens your rights, giving you improved access to your data, the right to review and in certain circumstances, edit or delete the information that organisations store about you - In short you have more control over your personal data. You do not need to do anything as we will keep looking after your data as we always have and if you do want to know more about the data we hold and how we use it, continue reading through our Privacy Notice.

#### What is personal data?

Personal data is any information related to a living person (known as a data subject) that can be used directly or indirectly (when combined with other information), to identify the person. It doesn't apply to non-living persons, for example most corporate entities, but may apply to data we process about individuals connected with that corporate.





#### What information do we collect?

We may collect the following types of personal data about you:

- Contact details such as; name, address(es), telephone number(s), email address(es);
- Curriculum vitae and photograph, employment details
- Compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom
- Employment preferences, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website
- Identification information such as; date of birth, gender, nationality, residency, national insurance number or other national identity number such as a passport number, driving license, bank or building society account details, occupation, employment status, employer and job title.

We may also collect, store and use personal data, where you have provided this to us, in respect of third parties, such as spouses, civil partners or dependants. If you do so you are responsible for and confirm you are entitled to provide us with this information and that you have informed those third parties of our identity and the purposes for which their personal data will be processed. You should draw their attention to this Privacy Notice. We will not use information except for the purpose for which you have provided it.

## How we will collect your data?

The company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following sections.

You may give your personal details to the company directly via email or over the phone with one of our representatives who are authorised to take personal data, on an application or registration form or via our website <a href="www.saucerecruitment.com">www.saucerecruitment.com</a>, supported by <a href="www.formdesk.com">www.formdesk.com</a>, or we may collect them from another source such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, personal recommendations, and any relevant social media sites.

When you visit our site we will automatically collect the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information if applicable, browser type and version
- Information about your visit, including the full Uniform Resource Locators (URL), products/jobs you viewed or searched for' page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers),methods used to browse away from the page and any phone number used to call our customer service number.

We may also receive information from third parties who contact us such as Her Majesty's Revenue & Customer (HMRC), the Department for Work & Pensions (DWP) or police or other government agencies.





# How do we use your personal data?

Sauce Recruitment will only use your personal data when the laws allows us to legitimately run a recruitment business to most commonly to provide services to you and clients that comply with legal requirements.

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

#### We use data to:

- to provide our services to you and contact you regarding opportunities of employment or notify you about changes to our service
- to match your details with job vacancies, to assist us in finding a position that is most suitable for you and to send your personal information (including sensitive personal information) to clients in order to apply for jobs
- to enable you to submit your CV for general applications, to apply for specific jobs or to subscribe to our job alerts
- to fulfil contractual obligations with our clients
- To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.

#### We will disclose your personal information to third parties:

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, and other agreements; or to protect the rights, property, or safety of our company or our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- who perform functions on our behalf and also provide services to you that you have requested, such as payroll companies who we will provide your personal data to including but not limited to; full name, contact details, date of birth and job title. For the purpose to ensure and process payment for hours worked
- who are known and trusted third parties where we have retained them to provide services that
  you or our clients have requested, such as reference, qualification and criminal reference
  checking services (as required), verification of the details you have provided from third party
  sources, psychometric evaluations or skills tests. These third parties comply with similar and
  equally stringent undertakings of privacy and confidentiality as Sauce Recruitment Ltd
- to third parties who perform functions on our behalf and who also provide services to us, such as
  professional advisors, IT consultants carrying out testing and development work on our business
  technology systems. These third parties comply with similar undertakings of privacy and
  confidentiality as Sauce Recruitment Ltd
- we may also release personal information to regulatory or law enforcement agencies, if they
  require us to do so. We will also disclose your information where we are permitted and
  requested to do so by law
- In the event that we sell or buy any business or assets, (in which case) we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Sauce Recruitment Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.





Other reasons for using your data:

- Your personal data is required by law and/or 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 we will be unable to provide our services.
- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- We may use your Personal Information to create anonymous recruitment statistics, from which you cannot be identified
- To allow you to participate in interactive features of our service, when you choose to do so;
- As part of our efforts to keep our site safe and secure;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- analytics and search engine providers that assist us in the improvement and optimisation of our site;

We do use our computer systems to search and identify personal data in accordance with parameters set by a person. We do not undertake automated decision making or profiling, a person will always be involved in the decision making process.

On rare occasions we may also use your personal data where we need to protect your interests (or someone else's interests) or where it is needed in public interest, for example for the investigation, detection and prevention of crime.

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

#### How long we may retain your data?

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so. We may retain your data for a period of 36 months, after which we can delete your data without consent. The 36 month timeframe begins at the moment we have obtained your data whether through direct communication with the company or other means, as described in 'How We Will Collect Your Data'.

You may be contacted by one of our representatives prior to deletion, informing you that we still hold your data. If you wish to continue using our service, we will continue to process your data in accordance's with our legal requirements.

In the case where we have placed you into a job, we are legally required to retain your personal data for up to 6 years after your last employment. As your record may contain information on our clients or financial information, these details will need to be kept, for example, for the satisfaction of any taxation audits from HMRC.





#### What does Sauce do it ensure our data is correct?

Prior to making an introduction we check that we have accurate information about you and endeavour to touch with you so you can let us know of changes to your personal data. We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system.

# How we secure your personal data

We understand that having the correct measures to ensure your privacy is paramount. Sauce have All of our data is held in highly-secure encrypted data centres and supported by DCS Ltd, to ensure the best-possible security for data.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

# What are your rights in connection with personal data?

You can ask us to do certain things with your personal data such as provide a copy of it, correct it or even delete it. There may be occasions where we cannot comply with a request and we will tell you if this is the case and give our reasons, this will usually be for legal or regulatory reasons. You do have the right to;

- Request access to your personal data This enables you to confirm whether we process your personal data and to receive a copy of your personal data we are processing and certain information about how we use your personal data.
- Request correction of the personal data that we hold about you This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request the erasure of your personal data You can ask us to delete or remove personal data where the processing is no longer necessary for the original purpose, or where you withdrew your consent, or the processing is unlawful or our personal data must be erased to comply with law. However in some cases, if we have another legal basis or legitimate interest for processing your personal data, we may not be able to comply. We will tell you if this is the case.
- Request the restriction of processing of personal data You can ask us to restrict or
  suspend the processing of personal data where you think the personal data we hold is
  inaccurate until we can verify its accuracy, or you believe we no longer need to process your
  personal data (but you do not want it erased), or you wish processing to be restricted
  pending confirmation that our processing is based on our overriding legitimate interest.
- **Object to processing of your personal data** You have the right to object to us processing your personal data where we are doing so:
  - Based on our legitimate interest (for the purposes described in this Privacy Notice)
     unless we can demonstrate compelling grounds as to why the processing should
     continue in accordance with data protection laws.
  - o For direct marketing purposes.
- Request the transfer of your personal data to another party In certain circumstances you can ask us to send your personal data to a third party of your choice. For example where it is





SE1 9PG

- information which is processed by us by automated means and you have consented to such processing or we need to process the information to perform our contract with you.
- Right to withdraw consent If you have provided your consent to the processing of your
  personal data for a specific purpose, you have the right to withdraw your consent for the specific
  processing at any time. This would not affect the validity of the processing prior to such date.
  Once we have received notification that you have withdrawn your consent, we will no longer
  process your information for the purpose or purposes you originally agreed to, unless we have
  another legitimate basis for doing so.
- Make a complaint to a supervisory body which in the United Kingdom is the Information
   Commissioner's Office. The ICO can be contacted through this link: <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>

We may ask you to verify your identity and for more information about your request.

Where you have consented to the company processing your personal data/and sensitive personal data you have the right to withdraw that consent or be informed of what data we hold on you at any time by contacting <a href="mailto:compliance@saucerecruitment.com">compliance@saucerecruitment.com</a>

If you request for deletion of your data, please be aware that we may not be required to do so, particularly where your file also holds information about our clients or financial information that we need to keep for a period of up to six years i.e. that relate to tax matters. Where we are unable to comply with your request we will provide reasons for failing to do so.

# How to exercise your rights

You can make a request by contacting Sauce Recruitment Ltd a number of ways, however we will always ask you to confirm your request in writing, this is solely to ensure that we and you have a time and data stamped record of your request. Your request will be acted upon within one month of you putting it through.

In most cases we will not charge a fee to action your request. However a reasonable administration fee may be charged if your request is deemed unfounded, excessive, or if further copies of your data are requested.

For security we may need you to confirm specific information on your identity before actioning a request, purely to ensure that your personal data is not disclosed to any person who has no right to receive it.

# Changes made to this privacy notice

We reserve the right to update this privacy notice at any time, and we will notify you if we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data. You should check our website at <a href="https://www.saucerecruitment.com">www.saucerecruitment.com</a> periodically to view the most up to date Privacy Notice.





Who to contact for queries, queries of complaints about this privacy or the way Sauce Recruitment Ltd uses your data

Legal Team – Dan Sheen or Kate Harty

Sauce Recruitment Ltd, Unit 2:03 Cargo Works, 1 – 2 Hatfield Street, London SE1 9PG

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>, 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.



