

## **XP Recruitment Ltd Privacy Policy**

XP Recruitment Limited (herein known as “XP Recruitment”, or “we”) is committed to protecting and respecting your privacy.

This privacy notice (together with other documents referred to herein) describes what personal information we collect from you and how we process your personal information when you use our website (xprecruitment.co.uk)

### **Who we are and what we do**

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We collect the personal data of the following types of people to allow us to undertake our business.

- Prospective and placed candidates for permanent or temporary roles
- Prospective and live client contacts
- Supplier contacts to support our services.
- Employees, consultants, temporary workers

We collect information about you to carry out our core business and ancillary activities.

### **Information you give to us, or we collect about you.**

This is information about you that you give us by filling in forms on our site xprecruitment.co.uk or by corresponding with us by phone or e-mail. It includes information you provide when you register to use our site, or to enter our database, subscribe to our services, and when you report a problem with our site or service.

The information you give us, or we collect about you may include your name, address, private and corporate e-mail address and phone number, financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g., LinkedIn, Twitter, Job boards etc

### **Information we collect about you when you visit our website.**

Regarding each of your visits to 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, browser plug-in types and versions, operating system, and platform.

Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time, page interaction information, methods used to browse away from the page, and any phone number used.

### **Information we obtain from other sources.**

This is information we obtain about you from other sources such as LinkedIn, corporate websites, job boards etc. In this case we will inform you, by sending you this privacy notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.

We work closely with third parties including, business partners, sub-contractors in payment services, advertising networks, analytics providers, search information providers, credit reference agencies, professional advisors, and 3<sup>rd</sup> party payroll umbrella companies, as well as the DVLA. We may receive information about you from them for the purposes of our recruitment services and ancillary support services.

### **Purposes of the processing and the legal basis for the processing**

We use information held about you in the following ways:

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.

To provide you with information about other goods and services we offer that are similar to those that you have already received, been provided with or enquired about.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary or permanent engagement.

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on to you to fulfil our legal obligations.

We will in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate. Consent will be obtained as part of the application process for candidates, whereby individuals can select the type of consent they are prepared to give.

### **Our Legitimate Business Interests**

Our legitimate interests in collecting and retaining your personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment or temporary worker placements. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.

In order to support our candidates' career aspirations and our clients' resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements.

To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts. This will allow us to place prospective candidates with new placements that come in as a result of new business.

### **Consent**

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. Candidates will also be required to fill out a consent form during registration in order to confirm the type of consent they are in agreement for XP Recruitment to hold.

Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

### **Other Uses we will make of your data:**

- Use of our website.
- To notify you about changes to our service, e.g., change of address and updates to our business process.
- To ensure that content from our site is presented in the most effective manner for you and for your computer.

We will use this information:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To improve our site to ensure that content is presented in the most effective manner for you and for your computer.
- 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.
- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

We may undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

### **Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our site.

## **Where we store and process your personal data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (" EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services, and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. XP will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you or where you have chosen a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **Retention of 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. Accordingly, we have a data retention notice and run data routines to remove data that we no longer have a legitimate business interest in maintaining.

We do the following to try to ensure our data is accurate:

Our website enables you to manage your data and to review whether the details we hold about you are accurate.

Prior to making an introduction we check that we have accurate information about you.

We keep in touch with you so you can let us know of changes to your personal data.

We request all candidates update their personal information if circumstances change such as "change of address".

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:

- the nature of the personal data.
- its perceived accuracy.
- our legal obligations.
- whether an interview or placement has been arranged and
- our recruitment expertise and knowledge of the industry by country, sector, and job role.

We may archive part or all 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. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

Our current retention notice is available upon request.

### **Your rights**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your personal data for marketing purposes.

You can exercise your right to accept or prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by either.

- email inbox – [data@xprecruitment.co.uk](mailto:data@xprecruitment.co.uk)
- calling us on – 01604 866229

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.

### **The GDPR provides you with the following rights. To:**

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer** of your personal information to another party in certain formats, if practicable.
- **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: <https://ico.org.uk/concerns/>

### **Access to information**

The Data Protection Act 1998 and the GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete.

A subject access request should be submitted to [data@xprecruitment.co.uk](mailto:data@xprecruitment.co.uk)

### **Changes to our privacy notice**

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.