



PRIVACY POLICY STATEMENT

INTRODUCTION

Mane Contract Services Ltd (“We”) are committed to protecting and respecting your privacy.

This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) replaces the Data Protection Regulation. The Regulation aims to harmonise data protection legislation, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Your rights under the GDPR are set out in this notice.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

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 also provide managed services. 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 WE COLLECT ABOUT YOU

The information we collect about you can be obtained in one of the following ways;

- Information you give to us
This is information about you that you give us by filling in forms on our website; www.mane.co.uk, or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our

site, to enter our database, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site or services.

The information you give us or we collect about you may include your name, address, private and corporate e-mail address and phone number, information about your wellbeing, financial information, compliance documentation, references, verification of qualifications and experience and your right to work in the UK, curriculum vitae and photograph, links to your professional profiles available in the public domain, e.g. LinkedIn, Twitter, business Facebook or Yammer.

- Information we obtain from other sources
This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, personal recommendations, and our company website.

When you use our website; www.mane.co.uk, we do not monitor or use your IP address or other personal data to identify you.

In this case we will inform you, by providing you with this privacy notice, within a maximum of 30 days of collecting the data that we hold personal data about you and for what purpose we intend to retain and process it.

We are working closely with third parties including Socium. We may receive information about you from them for the purposes of our recruitment services and ancillary support services.

PURPOSE OF PROCESSING DATA

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 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 purchased, 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 and permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

LEGAL BASIS FOR PROCESSING

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 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) or permission to post your photograph in a public domain (if you are an employee).

Our legitimate business interests

Our legitimate interests in collecting and retain 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.

We use personal data in a manner that is expected of a recruitment agency or recruitment business, and put in place safeguards to ensure the privacy and security of personal data. We also offer the opportunity for personal data to be removed from our records providing there is no contractual or legal obligation for us to retain data.

SENSITIVE PERSONAL DATA

Sensitive personal data will be subject to stricter controls. Examples of sensitive personal data include racial or ethnic origin, political opinions, religious or other beliefs, trade union membership, physical or mental health condition.

The individual's express written consent will be sought at the point at which sensitive personal data is collected.

Consent

Should we want or need to rely on consent to lawfully process your data we will request it orally, by e-mail or be an online process for the specific activity we require consent for and record your response on our system. You have the right to withdraw your consent to this particular process at any time.

DISCLOSURE OF YOUR INFORMATION

We will share your personal information with:

- Any member of our group both in the EEA and outside of the EEA.
- Selected third parties including:
 - Clients for the purpose of introducing candidates to them;
 - Candidates for the purpose of arranging interviews and engagements;
 - Suppliers for the purpose of training, competency testing, medicals and drug and alcohol testing;
 - Employee benefit providers for the purpose of providing employee benefit schemes, such as pension and life insurance;
 - Insurance broker and insurers for the purpose of obtaining relevant insurance policies and handling insurance claims;
 - Subcontractors including e-mail marketing specialists, event organisers, professional auditors, payroll bureaus and other financial service providers;
- Any organisation to which we sell our business or assets
- Any company or organisation that we are legally obliged to provide your personal data to

DATA STORAGE, SECURITY & RETENTION

The data we collect from you may be transferred to, and stored at, a destination outside of 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 be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. Mane Contract Services Ltd will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy notice.

Personal data is primarily stored electronically on our information systems, Bullhorn, Socium, ADP, Tempest, and Sage. These systems operate on secure servers. Any payment transactions will be encrypted (using SSL technology). Where we have given you (or where you have chosen) a password to gain access to certain parts of our site, systems or servers, you are responsible for keeping this password confidential and 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.

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, contractual agreements and legal obligations.

The Company has determined the retention periods for personal data according to the nature of the personal data, its perceived accuracy, and our legal and/or contractual obligations.

Our current retention schedule is available upon request.

The Company will review the nature of the information being collected and held on an annual basis to ensure there is a sound business reason for requiring the information to be retained.

RESPONSIBILITY

The Company has appointed a Data Representative as the named individual responsible for ensuring all personal data is controlled in compliance with the GDPR. Our Data Representative is Emma Sullivan, HR & Compliance Manager.

Employees, Client contacts and Third-party suppliers who have access to personal data must comply with this Policy and adhere to the procedures laid down by the Data Representative. Employees who fail to comply with the Policy and procedures may be subject to disciplinary action up to and including summary dismissal. External parties will be subject to investigation and appropriate sanctions.

EQUAL OPPORTUNITIES MONITORING

Where personal data obtained about candidates is to be held for the purpose of Equal Opportunities monitoring, all such data will be made anonymous.

YOUR RIGHTS

The GDPR provides you with the following rights.

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. This request may be subject to documentary evidence such as evidence of qualification.

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 to continue processing it.

Object to processing of your personal information where we are relying on a legitimate interest 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 (ICO). The ICO can be contacted through this link <https://ico.org.uk/concerns/>

The Company will review personal data regularly to ensure that it is accurate, relevant and up to date.

In order to ensure the Company's records are accurate and up to date, employees, client contacts, candidates and supplier contacts must notify the Company as soon as possible of any change in their personal details.

Employees, client contacts, candidates and supplier contacts will be entitled to amend any incorrect details and these corrections will be made to all files held on the Company's information systems. The request must be made in writing and may be subject to documentary evidence, e.g. certificate of qualification.

ACCESS TO PERSONAL DATA ("SUBJECT ACCESS REQUESTS")

You have the right to access personal data held about you. The Company will arrange for you to see or hear all personal data held about you within one month of receipt of a written request. Please send your request to hr@mane.co.uk.

CHANGES TO OUR PRIVACY POLICY

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

CONTACT

If you have any questions, comments or requests regarding this privacy notice you are welcome to address these in writing to Emma Sullivan at hr@mane.co.uk.

Signed



Position

Managing Director

Date: 1 September 2019