

Privacy Notice

Company Name:	Blueberry Creative Consultants Ltd ('the Company')
Company Contact details:	Cj Dalton, Group Head of Compliance cj@searchlightgroup.co.uk 020 8525 4844
Document DP5	Privacy Notice
Topic:	Data protection
Date:	21 st May 2018
Version:	1

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 the terms of the following statement.

1. COLLECTION AND USE OF PERSONAL DATA

1.1. Purpose of processing and legal basis

The Company has collected/may 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. The legal bases we rely upon to offer these services to you are:

- a) Consent
- b) Legitimate interest
- c) Legal obligation
- d) Contractual obligation

1.2. Categories of data

The Company has collected/may collect the following personal data on you:

Personal data

- a) Name
- b) Date of birth
- c) Contact details, including telephone number, email address and postal address
- d) Experience, training and qualifications
- e) CV
- f) National insurance number

Sensitive personal data

- a) Disability/health condition relevant to the role
- b) Criminal conviction

1.3. Legitimate interest

Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is as follows:

- a) The provision of work finding services.

1.4 Recipient/s of data

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

- a) Clients which the Company believe to be a suitable match to your specific skills, qualifications and experience.
- b) The REC and HMRC for auditing purposes as and when required.
- c) Referees (the details of which have been provided by yourself) in order to verify your previous work history and suitability for the provision of work finding services.

1.5 Statutory/contractual requirement

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 the consequences of failure to provide the data are: the Company will be unable to provide/continue to provide work finding services to you, until such time as the required data is provided.

2. OVERSEAS TRANSFERS

The Company may transfer only the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

3. DATA RETENTION

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time.

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 pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

Where the Company has obtained your consent to process your personal/sensitive personal data, we will do so in line with our retention policy (a copy of which is attached). 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.

4. YOUR RIGHTS

Please be aware that you have the following data protection rights:

- a) The right to be informed about the personal data the Company processes on you;
- b) The right of access to the personal data the Company processes on you;
- c) The right to rectification of your personal data;
- d) The right to erasure of your personal data in certain circumstances;
- e) The right to restrict processing of your personal data;
- f) The right to data portability in certain circumstances;
- g) The right to object to the processing of your personal data that was based on a public or legitimate interest;
- h) The right not to be subjected to automated decision making and profiling; and
- i) 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 Cj Dalton, whose details are provided at the top of this document.

5. SOURCE OF THE PERSONAL DATA

The Company has sourced/may source your personal data/sensitive personal data by the following means:

- a) Directly from your initial application, registration forms and all other applicable documented correspondence between yourself and the Company.
- b) Indirectly from Referees provided by yourself during your initial application.
- c) Indirectly from external sources – ie. LinkedIn, Jobs Boards and other sources manifestly made public by yourself.
- d) Indirectly from other publically accessible sources – ie. Credit Checking services and Companies House.

6. COMPLAINTS OR QUERIES

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Cj Dalton, Group Head of Compliance on cj@searchlightgroup.co.uk

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.