

<b>Company Name:</b>	Intelligent People Limited ('the Company')
<b>Company Contact details:</b>	Email - <a href="mailto:data@intelligentpeople.co.uk">data@intelligentpeople.co.uk</a> Phone – 01727 736690
<b>Document</b>	Privacy Notice
<b>Topic:</b>	Data protection
<b>Date:</b>	April, 2018

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 the Company will only use your personal data in accordance with the terms of the following statement.

### 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. The legal bases the Company relies upon to offer these services to you are:

- Consent
- Legitimate interest
- Legal obligation
- Contractual obligation

#### b. Legitimate interest

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

- If you've supplied the Company with your personal data to provide work finding services, the Company has a legitimate interest in storing your data so that it can contact you about relevant work opportunities/work seekers.
- The Company also has a legitimate interest in identifying the most suitable contacts within organisations to approach and offer recruitment services or to approach on behalf of a customer to offer a work opportunity or request a professional reference.

#### c. Recipient/s of data

The Company will not process your data with any third party.

#### d. Statutory/contractual requirement

If your personal data is required by law and/or a contractual requirement (e.g. the Company's 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 not be able to provide you with work finding services.

### e. Automated decision making

The Company does not carry out automated profiling or automated decision making.

### f. Sensitive personal data

The Company will only collect sensitive personal data from you where you have provided it and given explicit consent for the Company to collect and further process it.

## 2. Overseas Transfers

The Company may transfer only the information you provide to it to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. The Company 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 the Company to keep different data for different periods of time.

The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require the Company 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.

The Company 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 data, it will do so in line with its retention policy. 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.

## 4. 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 you have the right to withdraw that consent at any time by contacting [data@intelligentpeople.co.uk](mailto:data@intelligentpeople.co.uk).

### 5. Source of the personal data

The Company sources and receives personal data/sensitive personal data by the following means:

- Directly from you, when you respond to an advertisement placed by the Company, via the Company's website, or the Company may collect data from another source such as a jobs board.
- Publicly available sources, such as news reports, articles, news features, search engine results and professional networking sites.
- A referral from someone you've previously worked with, a colleague, employer, business contact or friend.

### 6. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact: [data@intelligentpeople.co.uk](mailto:data@intelligentpeople.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.