

Policy Document

Policy Document Control

Overview:	Privacy Notice (including for use on Future Education Ltd. website)
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Revisions

Revision Number	Page Number	Change Effected	Date of Change

Privacy Notice (including for use on Future Education Ltd. website)

Future Education Ltd. is a recruitment business which provides work-finding services to its clients and work-seekers. Future Education Ltd. must process personal data (including sensitive personal data) so that it can provide these services – in doing so, Future Education Ltd. acts as a data controller.

You may give your personal details to Future Education Ltd. 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. Future Education Ltd. 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 this privacy statement. At all times we will comply with current data protection laws.

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1. Collection and use of personal data

a. Purpose of processing and legal basis

Future Education Ltd. 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. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

If you have opted-in we may also send you marketing information and news via email/ text. You can opt-out from receiving these at any time by clicking “unsubscribe” when you receive these communications from us.

In some cases, we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

- Your consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you

b. Legitimate interest

This is where Future Education Ltd. has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where Future Education Ltd. has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Managing our database and keeping work-seeker records up to date;
- Providing work-finding services to you and our clients;
- Contacting you to seek your consent where we need it;
- Giving you information about similar products or services that you have used from us recently;

c. Statutory/contractual requirement

Future Education Ltd. has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements.) Our clients may also require this personal data, and/or we may need your data to enter into a contract with you. If you do not give us personal data we need to collect we may not be able to continue to provide work-finding services to you.

d. Recipient/s of data

Future Education Ltd. will process your personal data and/or sensitive personal data with the following recipients:

- Clients (whom we may introduce or supply you to)
- Former employers whom we may seek references from

- Payroll service providers who manage payroll on our behalf or other payment intermediaries whom we may introduce you to
- Other recruitment agencies in the supply chain

2. Information to be provided when data collected not from the individual

Categories of data: Future Education Ltd. has collected the following personal data on you:

Personal data:

Name
Contact details
Qualifications
Any other CV categories which have not been listed above

Source of the personal data: Future Education Ltd. sourced your personal data/sensitive personal data:

- From job boards, LinkedIn
- A former employer
- A referee whose details you previously provided to us
- Software providers who we use to support our services
- Cookies listed in section 7

This information came from a publicly accessible source.

3. Data retention

Future Education Ltd. will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time. For example, 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. This is currently 3 to 6 years.

Where Future Education Ltd. has obtained your consent to process your personal and sensitive personal data/specify which personal data, we will do so in line with our retention policy (a copy of which can be provided upon request). Upon expiry of that period Future Education Ltd. will seek further consent from you. Where consent is not granted Future Education Ltd. will cease to process your personal data and sensitive 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 Future Education Ltd. processes on you;

- The right of access to the personal data Future Education Ltd. 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 Future Education Ltd. processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by contacting our Data Protection Officer, Carmen Williams, GDPR@futureeducation.co.uk, 0208 256 0910. Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where Future Education Ltd. will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.

If you believe that any of your data that Future Education Ltd. processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

5. Cookies

Future Education Ltd's site may place and access certain first-party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. Future Education Ltd use Cookies to facilitate and improve your experience of Our website and to provide and improve Our services. Future Education Ltd have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using Future Education Ltd's site you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than Future Education Ltd. Third-party Cookies are used on Future Education Ltd Site for performance monitoring purposes. These Cookies are not integral to the functioning of Future Education Ltd Site and your use and experience of our Site will not be impaired by refusing consent to them.

All Cookies used by and on Future Education Ltd Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a cookie bar pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Future Education Ltd. to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of our Site may not function fully or as intended.

The table below explains the cookies we use and why.

Name of Cookie	Frist/Third Party	Provider	Purpose	More information
Remember Me	First Party Cookie	Eyeweb	Used to keep a user session active	If you opt in to use this cookie when logging in
Cookie Acceptance	First Party Cookie	Eyeweb	For users to accept the cookie	This is set when a user accepts the cookie bar (if this exists the bar will not appear again)
Google Analytics Cookie	Third Party Cookie	Google	Monitor	This cookie is used to monitor website usage and performance
Hotjar	Third Party	Hotjar	Website analyzing and mentoring	Website analyzing and mentoring

Future Education Ltd. Site uses analytics services provided by Google and Hotjar. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how our Site is used. This, in turn, enables Us to improve our Site and the services offered through it. You do not have to allow Us to use these Cookies, however, whilst our use of them does not pose any risk to your privacy or your safe use of our Site, it does enable Us to continually improve our Site, making it a better and more useful experience for you.

The analytics service(s) used by Future Education Ltd. Site use(s) Cookies to gather the required information.

In addition to the controls that Future Education Ltd provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however, you may lose any information that enables you to access our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

6. Log Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

7. Links to external websites

Future Education Ltd.'s website may contain links to other external websites. Please be aware that Future Education Ltd. is not responsible for the privacy practices of such other sites. When you leave our site, we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by Future Education Ltd.'s website.

8. Sale of business

If Future Education Ltd.'s business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

9. Data Security

Future Education Ltd. takes every precaution to protect our users' information. Future Education Ltd. use firewalls, browser certification technology, encryption, limited access and use of passwords.

Only employees who need the information to perform a specific job (for example, consultants, our accounts clerk or a marketing assistant) are granted access to your information.

Future Education Ltd. uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/ the Internet is not entirely secure and for this reason Future Education Ltd. cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/ the Internet.

If you share a device with others we recommend that you do not select the "remember my details" function when that option is offered.

If you have any questions about the security at our website, you can email Carmen Williams, GDPR@futureeducation.co.uk, 0208 256 0910

10.Changes to this privacy statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.

11.Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: **Carmen Williams Data Protection Officer, GDPR@futureeducation.co.uk, 0208 256 0910**

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.