

## **PRIVACY POLICY**

MillsHill Recruitment Limited is committed to protecting and respecting your privacy. This Policy is written in accordance with the EU's General Data Protection Regulation (GDPR), and describes the types of personal and sensitive data we collect, how we use it, with whom we share it, and the rights of and choices available to you regarding our use of your information. We will process your personal and sensitive data on the basis set out below as it is in our legitimate interests to do so following your registration.

## **OVERVIEW**

We are a specialist IT recruitment company based in the UK and the majority of our business is within the UK.

Data we collect is largely client based information & candidate based information.

We use this information to help clients hire staff & for candidates to find suitable jobs.

### We have never sold or rented this information to third parties, nor will we ever do.

Our marketing to 'clients/hirers' is largely phone & email based - with the intention that the information contained is of 'legitimate interest', i.e. candidates which may be suitable for your business. Clients / hirers have the right to opt out and/or to be forgotten at any time.

Our marketing to 'candidates' is largely phone & email based - with the intention that the information contained is of 'legitimate interest', i.e. jobs / contracts / engagements which may be suitable for your skillset / career. Candidates have the right to opt out and/or to be forgotten at any time.

### THE DATA WE COLLECT AND HOW WE USE IT

In each case, we will collect the information that we need to provide the recruitment services requested.

We collect data about you in two main ways:

- directly from you (when you register on our website, through job applications, through social media channels, through face-to-face meetings, and through phone and e-mail);
  and
- from third parties (your referees may disclose personal information about you, our clients may share personal information about you with us, we may obtain information about you from searching for potential candidates from third party sources such as LinkedIn, Job Sites - currently we use CWJobs, Reed, CV Library & Indeed, Internet Research, etc).

When you apply for a position or create an account to apply for a position, we may collect the following types of data:

- contact information such as your name, e-mail address, phone number(s), postal address, and social media accounts;
- employment and education history;
- language proficiencies and other work-related skills;
- details of the kind of work you are looking for, and your preferred work location(s);
- information contained in your C.V. or resume, cover letter or personal statement;
- date of birth;
- gender;
- citizenship and work authorisation status;
- information provided by references;
- results of skills tests;
- where appropriate and in accordance with local laws and requirements, we may also collect information relating to your health, or any details of any criminal offences and driving offences;
- candidate reference number when you register on our recruitment CRM database.

We use the data described above to perform the following activities:

- provide you with job opportunities;
- assess your suitability as a job candidate and your associate qualifications for positions;
- sending marketing materials, alerts regarding available positions;
- responding to individuals' inquiries;
- to administer skills tests;
- to process your references in the final stages of the recruitment process;
- to fulfil contractual obligations with prospective or intended employers;
- creating and managing online accounts.

# DO WE PASS DATA TO THIRD PARTIES?

Access to your data is only provided to our staff and we do not disclose information we collect about you, except for reasons set out below:

- to prospective or intended employers (or third parties assisting them in the recruitment process) or customers for the purpose of recruitment. C.V. submissions to employers will be for a valid and specific role, which will be agreed by you prior to being submitted on your behalf;
- verification of the details you have provided from third party sources;
- to third parties who perform functions on our behalf and who also provide services to us:
- to government or law enforcement authorities based on a lawful disclosure request.

#### HOW LONG WE STORE YOUR DATA

We will keep your data for as long as you wish to receive our communications and thereafter for the longer of the period required in order to meet our business, legal or regulatory responsibilities. Typically this is for 2 years.

## **YOUR RIGHTS & CHOICES**

Under applicable data protection laws, you have the following rights:

**Right to correct your personal information:** You can view the information we hold about you and/or update and rectify any missing or incorrect data we hold about you. You can also ask us to update and rectify any missing or incorrect data we hold about you.

**Right to be forgotten/have data deleted:** You have the "right to be forgotten", this means you can request us to delete and stop processing your data at any time. This right is subject to any legal rights or obligations we may have to retain data.

**Right to access and obtain a copy of your personal information:** You have the right to request a copy of the data that we hold about you.

**Marketing:** We will only send marketing communications to you via email. You may opt out of receiving any further marketing communications by clicking the 'unsubscribe' or 'opt-out' function in the email. In addition, you can also exercise your opt-out right at any time by contacting us and providing the following information: your name, your email address, a contact telephone number.

When you apply for a position our processing of your data is based on your consent, you also have the right to withdraw your consent at any time.

If you would like to exercise your rights or would like us to update information we have about you or your preferences, please email enquire@millshill.co.uk. Any request will be actioned within 48 hours.

The right to data portability: You have the right to ask us to download and export your information, and if requested, we will comply with your request within 30 days.

### WHERE WE STORE YOUR DATA

Client & Candidate data is stored on 'Profile' - a GDPR compliant Cloud based recruitment CRM system provided by Microdec see <a href="http://www.microdec.com/">http://www.microdec.com/</a> - their GDPR compliance statement can be viewed at <a href="http://www.microdec.com/g/qdpr-compliance-statement">http://www.microdec.com/g/qdpr-compliance-statement</a>

Client & Candidate email addresses are stored in a cloud based email marketing system provided by <a href="https://www.verticalresponse.com/">https://www.verticalresponse.com/</a> - their servers are based in the US.

We also use a GDPR compliant Cloud based job advertisement / application / candidate / data management system called AdCourier provided by <a href="https://www.broadbean.com/">https://www.broadbean.com/</a> - to view their GDPR status see <a href="http://info.broadbean.com/broadbean-gdpr">http://info.broadbean.com/broadbean-gdpr</a>

### **POLICY CHANGES**

Any changes we may make to our privacy policy in the future will be posted at:

http://bit.ly/MillsHill\_Privacy\_Policy\_2018

# **HOW TO CONTACT US**

If you have any questions or comments about this Privacy Policy please email:

enquire@millshill.co.uk

Your Data Protection / GDPR contact is Neil Mills, Director

Registered Office:

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You have a right to complain to the ICO [https://ico.org.uk/] if you think there is a problem with the way we are handling your data.