



## **GDPR Data Protection Policy**

At Camino Partners, your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

This Privacy Policy explains what we do with your personal data, whether we are in the process of helping you find a job, continuing our relationship with you once we have found you a role, providing you with a service, receiving a service from you, using your data to ask for your assistance in relation to one of our candidates, or you are visiting our website.

We reserve the right to update this policy where necessary, including to comply with any further amendments to data protection regulations.

### **What data we collect:**

#### **CANDIDATE DATA:**

In order to provide the best possible employment opportunities that are tailored to you, we need to process certain information about you. We only ask for details that will genuinely help us to help you, such as your name, age, contact details, education details, employment history, emergency contacts, immigration status, financial information (where we need to carry out financial background checks), and social security number (and of course you may choose to share other relevant information with us). Where appropriate and in accordance with local laws and requirements, we may also collect information related to your health, diversity information or details of any criminal convictions.

We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, and the times that our website is most popular.

#### **CLIENT DATA:**

If you are a Camino Partners customer, we need to collect and use information about you, or individuals at your organisation, in the course of providing you services such as: finding Candidates who are the right fit for you or your organisation; and/or notifying you of content published by Camino Partners which is likely to be relevant and useful to you.

#### **SUPPLIER DATA:**

We need a small amount of information from our Suppliers to ensure that things run smoothly. We'll collect the details for our contacts within your organisation, such as names, telephone numbers and email addresses. We'll also collect bank details, so that we can pay you. We may also hold extra information that someone in your organisation has chosen to tell us.

#### **PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:**

In order to provide Candidates with suitable employment opportunities safely and securely and to provide for every eventuality for them and our Staff, we need some basic background information. We only ask for very basic contact details, so that we can get in touch with you either for a reference or because you've been listed as an emergency contact for one of our Candidates or Staff members.

### **How do we collect your data?**

#### **CANDIDATES**

##### *Personal data you give to us:*

We need to know certain information about you to provide a tailored service. This will enable us to provide you with the best opportunities, and should save you time in searching through jobs and services that are not relevant to you.

There are numerous ways you can share your information with us. These may include:

- Entering your details on the Camino Partners website or via an application form, as part of the registration process;
- Leaving a hard copy CV or business card at a Camino Partners recruitment event or office;
- Emailing your CV to a Camino Partners consultant or being interviewed by them;



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- Applying for jobs through a job aggregator (such as Indeed), which then redirects you to the Camino Partners website or a Job Board (such as Reed or TotalJobs) which directly emails your application to a Camino Partners consultant;
- Subscribing to receive our Newsletter, Client industry updates or details of upcoming events.

### *Personal data from other sources:*

We receive personal data about Candidates from other sources. Depending on the relevant circumstances and applicable local laws and requirements, these may include personal data received in the following situations:

- 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 and other job sites;
- If you 'like' our page on Facebook or 'follow' us on Twitter we will receive your personal information from those sites;
- In some circumstances your details may be referred to us through personal contacts, networks or suppliers in reference to specific job opportunities.

### *Personal data automatically collected:*

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

## CLIENTS

We will always endeavour to provide Clients with the best talent in the marketplace and share market intelligence and resources to help improve your business. Given the niche nature of Camino Partners services, we will also reach out to prospective clients to keep them informed about the talent market and provide value-adding consultative resources.

### *Personal Data collected from you directly:*

- Where you contact us proactively, usually by phone or email; and/or
- Where we contact you, either by phone or email, or through our consultants' business development activities more generally.

### *Personal Data collected from other sources:*

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence including:

- From third party market research and by analysing online and offline media (which we may do ourselves, or employ other organisations to do for us);
- From delegate lists at relevant events; and
- From other limited sources and third parties (for example from our Candidates to the extent that they provide us with your details to act as a referee for them).
- In some circumstances your details may be referred to us through personal contacts, networks or suppliers in reference to specific partnership opportunities.

### *Personal data automatically collected:*

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us.

## **How do we use your data?**

## CANDIDATES

### *Recruitment Activities*

Our main area of work is recruitment, We've listed below various ways in which we may use and process your personal data for this purpose, where appropriate and in accordance with any local laws and requirements. Please note that this list is not exhaustive.

- Collecting your data from you and other sources, such as LinkedIn;
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment;

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- Providing you with our recruitment services and to facilitate the recruitment process;
- Assessing data about you against vacancies which we think may be suitable for you;
- Sending your information to Clients, in order to apply for jobs or to assess your eligibility for jobs;
- Enabling you to submit your CV, apply online for jobs or to subscribe to alerts about jobs we think may be of interest to you;
- Allowing you to participate in the interactive features of our services, when you choose to do so;
- Carrying out our obligations arising from any contracts entered into between us;
- Carrying out our obligations arising from any contracts entered into between Camino Partners and third parties in relation to your recruitment;
- Facilitating our payroll and invoicing processes;
- Carrying out customer satisfaction surveys;
- Verifying details you have provided, using third party resources (such as psychometric evaluations or skills tests), or to request information (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws);
- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties; and
- Processing your data to enable us to send you targeted, relevant marketing materials or other communications which we think are likely to be of interest to you.

We may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests. If you want to know more about this, please refer to our full Privacy Policy.

### *Marketing Activities*

Given the niche nature of the sectors we work in, we may periodically send you information that we think you may find interesting, or to ask for your help with connecting other Candidates with jobs. In particular, we may wish to use your data for the purposes listed below, where appropriate and in accordance with any local laws and requirements.

Please note that this list is not exhaustive. To:

- send you details of reports, promotions, offers, networking and client events, and general information about the industry sectors which we think might be of interest to you;
- display promotional excerpts from your details on the Camino Partners website as a success story (only where we have obtained your express consent to do so); and
- provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with Camino Partners.

We need your consent for some aspects of these activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we'll ask for this via an opt-in or soft-opt-in (which we explain further below).

- Soft opt-in consent is a specific type of consent which applies where you have previously engaged with us (for example by submitting a job application or CV, or registering a vacancy to be filled), and we are marketing other recruitment-related services. Under 'soft opt-in' consent, we will take your consent as given unless or until you opt out. For most people, this is beneficial as it allows us to suggest other jobs to you alongside the specific one you applied for, significantly increasing the likelihood of us finding you a new position. For other types of e-marketing, we are required to obtain your explicit consent.
- If you do not wish to receive any marketing correspondence, you have the right to withdraw your consent at any time and the process for doing this is covered under 'How to amend or withdraw consent'.
- We want to you aware that in some rare circumstances even if you have opted out from our marketing communications through our preference centre, it is possible that your details may be recaptured through public sources in an unconnected marketing campaign. We will try to make sure this doesn't happen, but if it does, we're sorry. We'd just ask that in those circumstances you opt out again.

### *Equal opportunities monitoring and other sensitive personal data*

We are committed to ensuring that our recruitment processes are aligned with our approach to equal opportunities. Some of the data we may (in appropriate circumstances and in accordance with local law and

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requirements) collect about you comes under the umbrella of "diversity information". This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background. Where appropriate and in accordance with local laws and requirements, we'll use this information on an anonymised basis to monitor our compliance with our equal opportunities policy. We may also disclose this (suitably anonymised where relevant) data to Clients where this is contractually required or the Client specifically requests such information to enable them to comply with their own employment processes.

- This information is what is called 'sensitive' personal information and slightly stricter data protection rules apply to it. We therefore need to obtain your explicit consent before we can use it. We'll ask for your consent by offering you an opt-in. This means that you have to explicitly and clearly tell us that you agree to us collecting and using this information.
- We may collect other sensitive personal data about you, such as health-related information, religious affiliation, or details of any criminal convictions if this is appropriate in accordance with local laws and is required for a role that you are interested in applying for. We will never do this without your explicit consent.
- You have the right to withdraw your consent at any time, details of which are under 'How to amend or withdraw consent'.

To help us to establish, exercise or defend legal claims

- In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

### CLIENT

#### *Recruitment Activities*

Our main area of work is recruitment, through providing you with Candidates; We've listed below the various ways in which we use your data in order to facilitate this.

- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment activities;
- Keeping records of our conversations and meetings, so that we can provide targeted services to you;
- Undertaking customer satisfaction surveys; and
- Processing your data for the purpose of targeting appropriate marketing campaigns.

We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests. If you would like to know more about what this means, please refer to the full GDPR policy.

In certain circumstances you have the right to object and can find out more about how and when to do this under 'How to amend or withdraw Consent'

#### *Marketing Activities*

Subject to any applicable local laws and requirements, we will not, as a matter of course, seek your consent when sending marketing materials such as our Industry Insights to a corporate postal or email address.

You have the right to opt out of receiving marketing materials from us and can find out more about how to do so under 'How to amend or withdraw consent'.

#### *To help us to establish, exercise or defend legal claims*

- In more unusual circumstances, we may use your personal data to help us to establish, exercise or defend legal claims.

### SUPPLIER DATA:

We will only use your information:

- To store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements;
- To offer services to you or to obtain support and services from you;
- To perform certain legal obligations;
- To help us to target appropriate marketing campaigns; and
- In more unusual circumstances, to help us to establish, exercise or defend legal claims.

We will not, as a matter of course, seek your consent when sending marketing messages to a corporate postal or email address.

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- In certain circumstances you have the right to object and can find out more under 'How to amend and withdraw consent.'

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We will only use the information that our Candidate gives us about you for the following purposes:

- If our Candidates or Staff members put you down on our form as an emergency contact, we'll contact you in the case of an accident or emergency affecting them; or
- If you were put down by our Candidate or a prospective member of Staff as a referee, we will contact you in order to take up a reference. This is an important part of our Candidate quality assurance process, and could be the difference between the individual getting a job or not.
- If you were put down by our Candidate or a prospective member of Staff as a referee, we may sometimes use your details to contact you in relation to recruitment activities that we think may be of interest to you, in which case we will use your data for the same purposes for which we use the data of Clients.

We may use your personal data for these purposes if we deem this to be necessary for our legitimate interests.

- You have the right to object and can find out more under 'How to amend and withdraw consent.'

### **Who do we share your personal data with?**

Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people:

- Individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies;
- Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);
- Third party service providers who perform functions on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
- Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place;
- Marketing technology platforms and suppliers;
- In the case of Candidates: potential employers and other recruitment agencies/organisations to increase your chances of finding employment;
- In the case of Candidates: third party partners, job boards and job aggregators where we consider this will improve the chances of finding you the right job;
- In the case of Candidates and our Candidates' and prospective members of Staff's referees: third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws;
- If Camino Partners merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.

### **How do we safeguard your data?**

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.

### **How long do we keep your data for?**

Given the niche nature of Camino Partners services and market, we have legitimate interests in keeping data for market intelligence purposes.

- We will attempt to verify the data we hold for you at least every two years.

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- We will delete your personal data from our systems if we have not had any meaningful contact with you (or, where appropriate, the company you are working for or with) for four years (or for such longer period as we believe in good faith that the law or relevant regulators require us to preserve your data).
- For those Candidates whose services are provided via a third party company or other entity, "meaningful contact" with you means meaningful contact with the company or entity which supplies your services. Where we are notified by such company or entity that it no longer has that relationship with you, we will retain your data for no longer than two years from that point or, if later, for the period of two years from the point we subsequently have meaningful contact directly with you.
- When we refer to "meaningful contact", we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our online services. If you are a Candidate we will consider there to be meaningful contact with you if you submit your updated CV onto our website, if you communicate with us about potential roles, either by verbal or written communication or click through from any of our marketing communications. Your receipt, opening or reading of an email or other digital message from us will not count as meaningful contact – this will only occur in cases where you click-through or reply directly.

### **How to amend or withdraw your data?**

One of the GDPR's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.

To get in touch about these rights, please contact us. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

#### *Right to object:*

This right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.

The "legitimate interests" and "direct marketing" categories above are the ones most likely to apply to our Website Users, Candidates, Clients and Suppliers. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:

- we can show that we have compelling legitimate grounds for processing which overrides your interests; or
- we are processing your data for the establishment, exercise or defence of a legal claim.

If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

#### *Right to withdraw consent:*

Where we have obtained your consent to process your personal data for certain activities (for example, for our marketing arrangements or automatic profiling), you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

#### *Data Subject Access Requests (DSAR):*

You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.

#### *Right to erasure:*

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You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:

- the data are no longer necessary for the purpose for which we originally collected and/or processed them;
- where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
- the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
- it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
- if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

We would only be entitled to refuse to comply with your request for one of the following reasons:

- to exercise the right of freedom of expression and information;
- to comply with legal obligations or for the performance of a public interest task or exercise of official authority;
- for public health reasons in the public interest;
- for archival, research or statistical purposes; or
- to exercise or defend a legal claim.

When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.

### *Right to restrict processing:*

You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.

The circumstances in which you are entitled to request that we restrict the processing of your personal data are:

- where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
- where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
- where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
- where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.

If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

### *Right to rectification:*

You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

### *Right of data portability:*

If you wish, you have the right to transfer your personal data between data controllers. In effect, this means that you are able to transfer your Camino Partners account details to another online platform. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to another online platform. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process



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automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.

*Right to lodge a complaint with a supervisory authority:*

You also have the right to lodge a complaint with your local supervisory authority.

If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), please contact [info@caminopartners.co.uk](mailto:info@caminopartners.co.uk). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

You may ask to unsubscribe from job alerts at any time. Details of how to do so can be found any email correspondence you receive.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

### **Our legal basis for processing your data**

#### **Legitimate Interest**

In accordance with Article 6 of the GDPR, we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

In an endeavour to provide you a more tailored service, we will process your data under the following legitimate interests.

#### **CANDIDATE DATA:**

- It is reasonable to expect that if you are looking for employment or have posted your professional CV information on a job board or professional networking site, you are happy for us to collect and otherwise use your personal data to offer or provide our recruitment services to you, share that information with prospective employers and assess your skills against our bank of vacancies. During your job search process, your prospective employer may also want to double check any information you've given us or to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with local laws. We need to do these things so that we can function as a profit-making business, and to help you and other Candidates get a job.
- Given the niche nature of the markets Camino Partners operate in, we want to provide tailored job recommendations and relevant articles to read to help you on your job hunt. It is therefore reasonable for us to process your data to make sure that we send you the most appropriate content.
- We also need to use your data for our internal administrative activities, like payroll and invoicing where relevant.
- We have our own obligations under the law, which it is a legitimate interest of ours to comply with. If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection, tax collection or actual or anticipated litigation.

#### **CLIENT DATA:**

- To ensure that we provide you with the best service possible, we store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations, meetings, registered jobs and placements. From time to time, we may also ask you to undertake a customer satisfaction survey. We think this is reasonable – we deem these uses of your data to be necessary for our legitimate interests as an organisation providing various recruitment services to you.

#### **SUPPLIER DATA:**

- We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our Suppliers. We also hold your financial details, so that we



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can pay you for your services. We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:

- If you have been put down by a Candidate or a prospective member of Staff as one of their referees, we use your personal data in order to contact you for a reference. This is a part of our quality assurance procedure and so we deem this to be necessary for our legitimate interests as an organisation offering recruitment services and employing people ourselves.
- If a Candidate or Staff member has given us your details as an emergency contact, we will use these details to contact you in the case of an accident or emergency. We are sure you will agree that this is a vital element of our people-orientated organisation, and so is necessary for our legitimate interests.

### **Consent**

In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.

Article 4(11) of the GDPR states that (opt-in) consent is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her." In plain language, this means that:

- you have to give us your consent freely, without us putting you under any type of pressure;
- you have to know what you are consenting to – so we'll make sure we give you enough information;
- you should have control over which processing activities you consent to and which you don't. We provide these finer controls within our privacy preference centre; and
- you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

We will keep records of the consents that you have given in this way.

We have already mentioned that, in some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you which are related to the recruitment services we provide as long as you do not actively opt-out from these communications.

As we have mentioned, you have the right to withdraw your consent to these activities. You can do so at any time, and details of how to do so can be found under 'How to Amend or Withdraw Consent'.

### **Establishing or defending legal claims**

Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".

This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.