

1. Important Information and Who We Are .....	1
2. The Data We Hold About You .....	2
3. How Is Your Personal Data Collected? .....	3
4. How We Use Your Personal Data .....	3
5. Disclosures of Your Personal Data .....	5
6. International Transfers.....	6
7. Data Security .....	6
8. Data Retention .....	6
9. Your Legal Rights .....	7

## 1. Important Information and Who We Are

### Purpose of this Privacy Policy

This privacy policy aims to give you information on how we collect and process your personal data in a variety of circumstances (including when using our website [www.graftonrecruitment.com](http://www.graftonrecruitment.com) and any data you may provide through this website when you use any interactive features such as our contact forms), or otherwise. It is important that you read this privacy policy so that you are fully aware of how and why we are using your data. Our website is not intended for children and we do not knowingly collect data relating to children. This version was last updated on the 18th of July 2018 and historic versions can be obtained by contacting us.

### Controller

**Grafton Recruitment Limited** is the controller and responsible for your personal data (collectively referred to as we, us or our in this privacy policy). If you have any questions about this privacy policy, including any requests to exercise any of your legal rights, please contact us at [privacy@graftonrecruitment.com](mailto:privacy@graftonrecruitment.com).

We are, from time to time, appointed to use (or otherwise process) personal data on behalf of other organisations. Such appointments will be made in accordance with relevant data protection legislation. Whenever we are appointed as processor, we will be restricted in the manner and purpose for which we can use personal data and will be subject to other obligations under that legislation. We will apply the same security and data handling processes to the personal data which we have been provided with by the controller as we do to personal data over which we are the controller.

### Third-Party Links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. The Data We Hold About You

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, image, online username or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access or website.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Employment Data** includes data which may be provided to us during a recruitment campaign or during your assignment or employment, including your racial or ethnic origin, biometric data, religious or philosophical beliefs or trade union membership.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

### If You Fail To Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

### Your Duty To Inform Us Of Changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### 3. How Is Your Personal Data Collected?

We use different methods to collect data from and about you including through:

Process of Collection	Types of Data Collected
A) during direct interactions whenever you provide the personal data in person (including data contained in your curriculum vitae or collected from you at an initial meeting), by post, by phone, via our website, by email, via social media, or when you are visible on any of our CCTV equipment	Identity Data Contact Data Financial Data Marketing and Communications Data Employment Data
B) as you interact with our website, we may use cookies, server logs and similar technologies	Technical Data Usage Data Marketing and Communications Data
C) from third parties including your employer, analytics providers, advertising networks, electronic payment providers (like WorldPay) or data aggregators (like Google Analytics and BroadBean)	Identity Data Contact Data Technical Data Financial Data
D) from publicly available sources (like Companies House, Access NI, the Police Service of Northern Ireland, credit agencies the Electoral Register and social media)	Identity Data Contact Data
E) from employers/hirers during your assignment or employment with them	Employment Data

### 4. How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data under the following conditions:

- where we need to perform a contract we are about to enter into, or have entered into, with you;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than where expressly asked for separately than in this policy, in relation to certain cookies and, if necessary, for sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

## Purposes For, and Legal Basis On, Which We Will Use Your Personal Data

We have set out below a description of all the ways we may use your personal data, and which of the legal bases we rely on to do so (including a description of the legitimate interest pursued). Note that we may process your personal data for more than one basis depending on the specific purpose for which we are using your data, but will only rely on the “performance of a contract” basis whenever the contract is with the individual to whom the personal data relates.

Purpose/Activity	Legal Basis For Processing Including Basis Of Legitimate Interest
To register you as a new customer, to administer a contract with you, to inform you of potential job placements in the category you have identified, to share your curriculum vitae and other details with potential employers/hirers	Performance of a contract with you
To manage our relationship with you which may include notifying you about changes to our terms or privacy policy, asking you to leave a review or dealing with any issues you have brought to our attention	<ul style="list-style-type: none"> <li>a) Performance of a contract with you</li> <li>b) Necessary to comply with a legal obligation</li> <li>c) Necessary for our legitimate interests (to keep our records updated, to study how customers use our products/services and to deliver good customer service)</li> </ul>
To enable you to participate in a prize draw, competition or complete a survey	<ul style="list-style-type: none"> <li>a) Performance of a contract with you</li> <li>b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</li> </ul>
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>b) Necessary to comply with a legal obligation</li> </ul>
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> <li>a) Necessary for our legitimate interests (to develop our products/services and grow our business)</li> <li>b) if no other bases is available and the personal data relates to you acting as an unincorporated person, on your consent</li> </ul>
To share your data with potential employers, to manage the recruitment process, including setting up and conducting interviews, evaluating the results and as otherwise needed in the recruitment and hiring process	<ul style="list-style-type: none"> <li>a) Performance of a contract with you</li> <li>b) Necessary for our legitimate interests (to solicit, evaluate and select applicants for employment)</li> <li>c) Necessary to comply with a legal obligation</li> </ul>

**NOTE:** Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

## Marketing

If you are a customer of ours, we may contact you from time to time by call or email to provide some information about our products or services. You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us, as appropriate, at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service experience or other transactions.

We will get your express opt-in consent before we share your personal data with any company outside of our own for marketing unrelated to our company.

## 5. Disclosures of Your Personal Data

We may have to share your personal data with the parties (all established in the European Union unless otherwise stated) set out below for the purposes set out in the table in paragraph 4 above:

- Our clients or other entities who may be interested in employing or otherwise engaging you for work;
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- HM Revenue & Customs, central Government, regulators and other authorities acting as processors, controllers in common or joint controllers who require reporting of processing activities in certain circumstances;
- Professional advisers acting as processors, controllers in common or joint controllers including lawyers, bankers, auditors and insurers based in the European Union or United Kingdom who provide consultancy, banking, legal, insurance and accounting services;
- Service providers acting as processors, including (as at the date noted above and who may be updated from time to time):
  - The Access Group under company number 2343760, whose registered office address is at The Old School, Stratford St. Mary, Colchester, Essex, England, CO7 6LZ;
  - Novosco Ltd under company number NI028408, whose registered office address is at Concourse Building 3, Queens Road, Belfast, Northern Ireland, BT3 9DT;
  - Recruit So Simple under company number 07480828, whose registered office address is at 12 Borelli Yard, Farnham, Surrey, England, GU9 7NU;
  - Hallmark Solutions Limited, under company number NI024831, whose registered office address is at Unit 14 McKibben House, Eastbank Road, Carryduff, Belfast, Northern Ireland, BT8 8BD;
  - Asset Management (Ireland) Ltd under company number NI040520, whose registered office address is at Unit 1 Mallusk View, Central Park, Newtownabbey, Northern Ireland, BT36 4FR;
  - Broadbean Technology Ltd, under company number 04283360, whose registered office address is at The South Quay Building, 189 Marsh Wall, London, England, E14 9SH;
  - British Telecommunications Public Limited Company, under company number 01800000, whose registered office address is at 81 Newgate Street, London, EC1A 7AJ ;
  - Morgan Document Security, John Morgan & Sons Limited, under company number NI3479, whose registered office is at 30 Island Street, Belfast, Northern Ireland, BT4 1DH;
  - Now Pensions Ltd, under company number 07766398, whose registered office is at 2nd Floor 25 Christopher Street, London, England, EC2A 2BS;
  - Standard Life Aberdeen PLC under company number SC286832, whose registered office is at Standard Life House, 30 Lothian Road, Edinburgh, Scotland, EH1 2DH;
  - Canada Life Irish Holding Company Limited, under company number 297727, whose registered address is at Irish Life Centre, Abbey Street Lower, Dublin 1, Ireland;
  - Bupa Ireland, under company number 144437, whose registered office is at No. 12 Fitzwilliam Square, Dublin 2, Ireland;
  - VHI Healthcare, under company number 521896, whose registered office is at VHI House, Lower Abbey Street, Dublin 1, Ireland;

- Shred-It Limited, under company number 04047194, whose registered office is at Ground Floor, 177 Cross Street, Sale, Manchester, England, M33 7JQ;
- Cyclone Shredding, under company number 25561, whose registered office is at 6 Upper Stephens Street, Dublin 8, Ireland;
- Iron Mountain (UK) PLC, under company number 01478540, whose registered office is at Cottons Centre 3rd Floor, Tooley Street, London, England, SE1 2TT;
- Apogee Corporation Limited, under company number 02853595, whose registered office is at Nimbus House Liphook Way, 20-20 Business Park, Maidstone, Kent, England, ME16 0FZ;

And the following who are based outside the EEA (as defined below):

- The Rocket Science Group LLC (Mailchimp - Online Marketing), 675 Ponce de Leon, Avenue NE, Suite 5000, Atlanta, Georgia, United States of America, GA 30308; and
- PRO Unlimited Inc., registered office at 999 Stewart Avenue, Suite 100, Bethpage, United States of America, NY 11714 and principal place of business located at 1150 Iron Point Road, Suite 100, Folsom, United States of America, CA 95630.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions

## 6. International Transfers

We do not transfer your personal data outside the European Economic Area (EEA) unless noted above (and then, only on the basis of the EU-US Privacy Shield framework or other adequate measure).

## 7. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

## 8. Data Retention

### How Long Will You Use My Personal Data For?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, how long a legal claim may be taken, whether we can achieve those purposes through other means, and the applicable legal requirements. Our Retention Schedule is available on request for affected parties.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further policy to you.

## 9. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

### No Fee Usually Required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### What We May Need From You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### Time Limit To Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than 30 days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Supervisory Authority Contact

You have the right to make a complaint at any time to a supervisory authority in relation to any data protection issues, such as the Information Commissioner's Office (ICO), the supervisory authority in the UK ([www.ico.org.uk](http://www.ico.org.uk)) or the Data Protection Commissioner (DPC), the supervisory authority in Ireland (<http://dataprotection.ie>). We would, however, appreciate the chance to deal with your concerns before you approach a supervisory authority so please contact us in the first instance at [privacy@graftonrecruitment.com](mailto:privacy@graftonrecruitment.com).