

Harris Hill's Privacy Policy

1. WHAT IS THE PURPOSE OF THIS DOCUMENT?

Harris Hill is a recruitment consultancy which assists individuals to find permanent or temporary work with our clients. Harris Hill is committed to protecting the privacy and security of your personal data and has prepared this Privacy Notice in order to explain how we obtain your data, how we process it and our legal authority for doing so.

This Privacy Notice describes how we collect and use personal data about you both during and after your time with us, in accordance with the General Data Protection Regulation (GDPR). This Notice applies to current and former employees, contractors, and candidates for permanent and temporary work.

The Privacy Notice does not form part of any contract of employment or other contract to provide services. Harris Hill may update this Notice at any time.

The person responsible for data protection matters at Harris Hill is our Data Protection Officer, Audrey Yap, who may be contacted at gdpr@harrishill.co.uk

If you have any queries about this Privacy Notice, please contact our Data Protection Officer.

1.1 Harris Hill is a "data controller". This means that we are responsible for deciding how we hold and use personal data about you. We are required under data protection legislation to notify you of the data contained in this Privacy Notice.

1.2 It is important that you read this Privacy Notice, together with any other notice Harris Hill may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such data.

2. DATA PROTECTION PRINCIPLES

2.1 Harris Hill will comply with data protection law. This says that the personal data it holds about you must be:

- (a) Used lawfully, fairly and in a transparent way.
- (b) Collected only for valid purposes that have clearly been explained to you and not used in any way that is incompatible with those purposes.
- (c) Relevant to the purposes we have told you about and limited only to those purposes.
- (d) Accurate and kept up to date.
- (e) Kept only as long as necessary for the purposes we have told you about.
- (f) Kept securely.

3. THE KIND OF INFORMATION WE HOLD ABOUT YOU

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

In addition, there is a category of sensitive personal data which requires a higher level of protection and which is dealt with in more detail at paragraph 7 below.

3.2 Harris Hill may collect, store, and use the following categories of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Your sex.
- Marital status and dependants.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date and duration of employment, assignments and interviews
- Location of interview or employment or assignment workplace.
- Copy of driving licence

- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Compensation history.
- Information about your performance at work or whilst on assignment.
- Disciplinary and grievance information.
- Information about your use of our information and communications systems.
- Photographs.

3.3 Harris Hill may also collect, store and use the following "special categories" of more sensitive personal data:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.

4. HOW IS YOUR PERSONAL DATA COLLECTED?

4.1 Harris Hill may collect personal data about you from the following sources:

- You (for example through your curriculum vitae, application or registration form).
- A client.
- Other candidates.
- Online job sites.
- Marketing databases.
- Public domain.
- Social media.
- At interview.
- Notes following a conversation or meeting.
- Our websites and software applications.

4.2 Harris Hill needs to use all the categories of information in the list at paragraph 3.2 primarily to allow us to perform our contract with you and to enable us to comply with our legal, regulatory and statutory obligations. In some cases we may use your personal data to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal data are listed below:

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Providing contractual benefits to you.
- Liaising with your pension provider.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.

- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Collating market or sector specific information and providing it to our clients.
- Sending information about you to clients or potential clients related to our recruitment services.
- Providing information to regulatory authorities and statutory bodies and legal or other professional advisors, including insurers.
- To market our recruitment services.
- Retaining a record of our dealings with clients and with you.
- For the purpose of backing up information on our computer systems.

4.3 Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

5. IF YOU FAIL TO PROVIDE PERSONAL DATA

5.1 If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit to you or putting you forward for temporary or permanent position), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

6. CHANGE OF PURPOSE

6.1 Harris Hill will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose for which it was obtained. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

6.2 Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

7. SENSITIVE PERSONAL DATA

7.1 Sensitive personal data is data which is very personal to you and is usually irrelevant to our consideration to your suitability for a job role with us or with our clients. Examples of sensitive personal data include your political, religious or philosophical beliefs, sexual orientation, race or ethnic origin or information relating to your health.

7.2 Harris Hill may process sensitive personal data in the following circumstances:

- (a) In limited circumstances, with your explicit written consent.
- (b) Where we need to carry out our legal obligations and in line with our data protection policy.
- (c) Where it is needed in the public interest, such as for equal opportunities monitoring or for Harris Hill's own equal opportunity monitoring.
- (d) Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

7.3 Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

8. DATA SHARING

8.1 We may have to share your data with our clients, and other necessary parties, for the provision of our recruitment services. We also share your data with our third-party service providers. The following activities are carried out on our behalf by third party providers:

- Pension Provider: Now: Pension Ltd.
- Payroll: Brookson Limited
- IT Maintenance: CHS Networks Ltd
- HR: Centurion Management Systems Ltd

We require third parties to respect the security of your data and to treat it in accordance with the law. We may transfer your personal data outside the EU. If we do, you can expect a similar degree of protection in respect of your personal data to that you enjoy with in the EU.

8.2 We will also share your personal data with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

8.3 We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

9. DATA SECURITY

9.1 We have put in place measures to protect the security of your personal data and to ensure that our systems and records are secure. We have also put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, or altered or disclosed. In addition, we limit access to your personal data to those employees, agents, clients, contractors and other third parties who have a business need and legal right to receive it.

9.2 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

10. DATA RETENTION

10.1 Normally, your data will not be retained for more than six years from when we last provided our services to you or from when you were last employed by us. We may retain data for longer than six years where we have a legal or contractual obligation to do so or we form a view that your personal data identifies specialist skill sets which may remain in demand and about which we may contact you in the future. You may, however, request that your personal data is erased (see paragraph 10.3 below). In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such data without further notice to you.

10.2 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 working relationship with us.

10.3 Under certain circumstances, by law you have the right to:

- **Request access to your personal data** (commonly known as a "data subject access request").
- **Request correction** of the personal data that we hold about you.
- **Request erasure** of your personal data.
- **Object to processing** of your personal data.
- **Request the restriction** of processing of your personal data.
- **Request the transfer** of your personal data to another party.

11. RIGHT TO WITHDRAW CONSENT

11.1 In limited circumstances, where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

12. CHANGES TO THIS PRIVACY NOTICE

12.1 We reserve the right to update this Privacy Notice at any time, and we will post a revised Privacy Notice on our website when we make any substantial change to it. We may also notify you in other ways from time to time about the processing of your personal data.