



Ball and Hoolahan

THE MARKETING RECRUITMENT CONSULTANTS

Ball & Hoolahan Ltd t/a become Privacy Policy

Welcome to **Ball & Hoolahan Ltd**'s privacy notice.

Ball & Hoolahan Ltd respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), when you register with us or ask us to find you work, and when we place you in a role. This notice will also tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively you can download a pdf version of the policy here <https://www.ballandhoolahan.co.uk/privacy>

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how **Ball & Hoolahan Ltd** collects and processes your personal data through your use of this website, when you register as a candidate, sign up for job alerts or search for jobs.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice that we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

Ball & Hoolahan Ltd is the data controller and responsible for your personal data (also referred to as “we”, “us” or “our” in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

CONTACT DETAILS

Our full details are:

Company name: Ball & Hoolahan Ltd

Data privacy manager: Dianne Lang – Group Operation’s Manager

Email address: dianne@becomeuk.com

Postal address: First Floor, The Fire Station, 150 Waterloo Road, London. SE1 8SB

Telephone number: 020 7240 0088

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk) or your own country’s supervisory authority for data protection. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 11/5/2018 and historic versions can be obtained by contacting us.

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.

THIRD-PARTY LINKS

This 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 notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, 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 as follows:

- **Contact data** including name, email address, address and phone number
- **Device and browser data**, such as IP address, information about your device and browser settings
- **Marketing and communications data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

- **Employment and educational history data**, such as CVs and job titles, qualifications and authorisations

Where you have registered with us and/or we have placed you in a permanent or temporary role, we may also collect, use, store and transfer the following categories of your personal data:

- **References** where you have provided us with referees' contact details
- **Eligibility to work data** such as passport and visa checks
- **Bank, tax and social security data** such as account numbers, NI number, Unique Tax Reference (UTR)
- **Your preferences** such as preferred hours, location, salary etc.
- **Role data** about roles in which you have been placed

Sensitive personal data

We do not usually collect sensitive personal data.

IF YOU FAIL TO PROVIDE PERSONAL DATA

If you fail to provide with personal data when requested, we may not be able to provide you with work-finding or recruitment services.

3. HOW YOUR PERSONAL DATA IS COLLECTED

We may collect data about you when you register with us, visit our website, or when we communicate by email, SMS, phone or in person.

We use different methods to collect data from and about you from third parties:

- (a) jobs boards, *such as* Marketing Week, Campaign and The Grocer
- (b) social media platforms, such as LinkedIn;
- (c) analytics providers such as Google based outside the EU;
- (d) providers of technical, payment and delivery services such as Ipinnacle, IMS, GBM based inside or outside the EU);
- (e) publicly available sources such as Companies House and the Electoral Register based inside the EU.
- (f) providers of technical, payment and delivery services such as payroll providers based inside the EU;
- (g) where you have provided us with referees' contact details, we may obtain references from those referees;
- (h) where we have placed you in a role, we may also obtain information about you from the hirer and/or from HMRC and other government agencies.

4. HOW AND WHY 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 in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to comply with a legal or regulatory obligation.
- 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 you have consented to our doing so.

In certain circumstances we are required to process certain categories of personal data in order to comply with our legal obligations under relevant legislation, including the Conduct of Employment Agencies and Employment Businesses Regulations 2003 and other relevant tax, social security or other legislation. You are not under any obligation to provide us with your personal data, but if you do not we may be unable to meet our legal obligations and so may not be able to provide you with work-finding or recruitment services.

We also need to process certain categories of your personal data in order to enter into an agreement with you and to comply with our obligations under that agreement.

Where no contractual or legal obligation exists, we may still need to process your personal data in order to pursue our legitimate business interests. Our business involves providing work-finding and recruitment and related services and so we may need to process your personal data in order to pursue our legitimate interests in achieving this. We may also need to retain personal data in case we need to establish or defend a legal claim. We will balance our legitimate interests against your rights and freedoms and your legitimate interests and expectations.

We may rely on your consent in certain circumstances, for example to process your data for the purposes of sending you direct marketing by email or SMS (text message), to use cookies when you visit our website, or to process sensitive personal data.

If you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Document / Personal Data	Why we need it	Our lawful ground for processing it
Name, address, DOB	To verify your identity and CV or employment history, qualifications and authorisations	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
Contact details	To communicate with you and notify you about suitable roles and other important information	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
Role requirements	To find you the right candidate, role or assignment	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
CV, employment history, qualifications, authorisations	To check your suitability for a role or assignment	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
ID and immigration checks	To verify your identity and right to work	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
Confirmation that you are willing to work in a particular role	To find you the right role or assignment	Legal obligation (if applicable). Legitimate interests.
Interview details	To set up interviews with hirers	Contractual obligation (if applicable). Legitimate interests.
Notes, assessments, comments, feedback from interview.	To find you the right role or assignment	Contractual obligation (if applicable). Legitimate interests.
Emails and correspondence with you and with potential hirers and intermediaries	To find you the right role or assignment	Contractual obligation (if applicable). Legitimate interests.
References (collected from third parties)	To verify your experience and suitability for a particular role or assignment	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
Details of placement/assignment and hirer	To keep records of placements made or assignments arranged by us	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
Candidate/work-finding Agreement	To set out the basis of the relationship between you and us	Legal obligation (if applicable). Legitimate interests.

Bank details (temp only)	To pay you	Legal obligation (If applicable) Contractual performance.
Social security information, NI number (temp only)	To report to HMRC	Legal obligation (If applicable) Contractual performance.
Information about your pay and conditions (temp only)	To protect your rights	Legal obligation (if applicable). Contractual obligation (if applicable). Legitimate interests.
Other necessary, relevant personal information	To perform our services for you	Contractual obligation (if applicable). Legitimate interests.
IP address, browser and device data	To deliver relevant website content and administer our website	Legitimate interests.

MARKETING

We would like to use your contact details to contact you about news and information which we think may be of interest to you. However, we will not contact you with marketing material unless you consent to our doing so.

You may also receive marketing communications from us if you have previously requested information or services from us and you did not opt out of receiving marketing communications from us at the time.

You have the right to unsubscribe at any time, by clicking the link which appears in the footer of all marketing emails.

JOB ALERTS

We may use your personal data to send you automated job alerts with information about roles that may be of interest to you if you have asked us to do so.

You have the right to unsubscribe to automated job alerts at any time, by clicking on the link which appears in the email footers of marketing.

THIRD-PARTY MARKETING

We will obtain your express opt-in consent before we share your personal data with third parties for marketing purposes.

CHANGE OF PURPOSE

We 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.

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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

Your personal information will be processed by our staff and our subcontractors (including IT providers) and will be provided to appropriate third parties such as potential hirers and intermediaries in order to provide you with work-finding services. Please let us know if you do not want your personal information to be disclosed to a particular third party or category of third parties.

We may also share your personal details with your previous or current employers or other third parties identified by you to us as potential referees.

We may be required by law to share certain categories of your personal data with tax authorities and other government agencies.

We may use a third party organisation to operate our payroll or to check references, employment history and qualifications. We will need to provide them with certain categories of your personal data and they will be under an obligation to process it as instructed by us and in accordance with relevant data protection legislation. We may also need to provide certain categories of personal data to your pension provider, if appropriate.

We may also need to share your data with our professional advisers, such as lawyers and accountants.

We may also share your personal data with 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 notice.

We will not share your personal data with any other organisation unless it is necessary and in connection with providing our work-finding and recruitment services.

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

Your personal data will be stored within the European Economic Area (EEA) on either local or cloud-based servers and will be subject to technical and organisation safeguarding protection measures. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

Some categories of data may be transferred outside the EEA, including IMS – payroll processing and accounts functions in India, Become Australia and Become Hong Kong. If it is necessary to transfer your data to a country outside the EEA to assist us in providing work-finding and recruitment services, we will take all reasonable steps to ensure that your data is subject to the same protection as that provided by the EU and that it is subject to technical and organisation safeguarding protection measures, as follows:

We will only transfer your personal data to organisations located in countries outside the EEA, if the organisation:

- is based in a country which has been deemed to provide an adequate level of protection for personal data by the European Commission, or
- has entered into an agreement with us which contains specific contract clauses approved by the European Commission which give personal data the same protection that it has in Europe.

For further details, please see the following:

[*European Commission: Adequacy of the protection of personal data in non-EU countries*](#)

[*European Commission: Model contracts for the transfer of personal data to third countries*](#)

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

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. 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.

We will only transfer personal data to a third party if they agree to comply with those procedures and policies, or put in place adequate measures prior to receiving it. Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of the personal data.

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.

8. DATA RETENTION

FOR HOW LONG WILL YOU USE OR RETAIN MY PERSONAL DATA?

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.

By law we have to keep certain information about candidates for between 1 and 7 years. Where we have entered into a contract with you, we may also need to retain data for up to 7 years in order to ensure that we can meet our contractual obligations to you.

As a general rule, if you have been placed by us, we will not retain data of your data for more than 7 years from the date of registration or the date of last placement (whichever is later) unless we have continued to have meaningful contact with you over the preceding 2 years.

If you have not been placed by us, we will not keep your data for more than 2 years from the date of registration or the date when we last had meaningful contact with you (whichever is later).

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 notice to you.

9. YOUR LEGAL RIGHTS

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

1. request access to personal data we hold about you;
2. object to the processing of your personal data;
3. ask to have inaccurate data held about you removed or restricted;
4. ask to have inaccurate data held about you or corrected;
5. if processing of your personal data is based only on consent, to withdraw that consent;
6. request that your personal data is shared with a third party in a commonly used, machine readable format.

If you wish to exercise any of the rights set out above, please contact us via Dianne Lang - dianne@becomeuk.com

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 fee if requests are repeated or obviously excessive.