



GDPR POLICY STATEMENT

ALLEN & YORK is an employment agency and an employment business. We help qualified and experienced professionals find suitable positions within their technical discipline.

Privacy & Use of the Data Supplied to ALLEN & YORK

ALLEN & YORK Ltd are committed to protecting and respecting candidate and client privacy.

This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Your new rights under the GDPR are set out in this notice but will only apply once the GDPR becomes law on 25th May 2018.

Please read the following carefully to understand our views and practices regarding your data and how we will treat it.

For the purposes of data protection legislation in force from time to time the data controller is ALLEN & YORK Ltd of Farris House, Wimborne, Dorset BH21 4EL

Our nominated representative OR Data Protection Officer is Jenna Udall. Contactable on dpo@allen-york.com

Who we are and what we do

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We collect the personal data of the following types of people to allow us to undertake our business;

- Prospective and placed candidates for permanent or temporary roles.



- Prospective and live client contacts.
- Supplier contacts to support our services.
- Employees, consultants, temporary workers.

Purpose of Processing

We will never use your information for any purpose other than in connection with the recruitment process or other named permissions you agree to give us.

Legal Basis for Processing

ALLEN & YORK process data on the legal basis of “Legitimate Business Interests” in accordance with GDPR regulations. As a recruitment business we hold personal data of professionals such that we might identify, contact &/or represent them in matters related to their career or recruitment needs. Personal details will only be held and used in pursuit of these objectives.

Our Legitimate Business Interests

Our legitimate interests in collecting and retaining personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.

In order to support our candidates’ career aspirations and our clients’ resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements.

To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts.



Submission of candidate's (a) resume/CV will be done under the legal basis of "Consent". Which we will ask for by email, verbally or text. Where consent is the lawful basis for our processing candidates have the right to withdraw consent to this particular processing at any time.

What type of data do we collect?

The personal data that we collect from candidates is necessary to ensure the efficiency or lawfulness of the recruitment process. This data includes identification information: name, address, e-mail address, career and education history, as well as nationality and status to work in the UK, which we are required to collect by law. Additional data may be requested from to satisfy role specific certifications and qualifications. This would be relevant and limited appropriate to the role. Any other personal identification data is collected only so far as is necessary to ensure we meet legal requirements.

By registering with us via our web site, the candidate's consent will be required for our collecting and processing of the data and, where necessary, disclosing this information to prospective employers in connection with the recruitment process.

Candidates can be assured that ALLEN & YORK will not sell, trade or rent their personal information to third parties.

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Sourcing data

We source CVs from CV databases (e.g. CV Library and Jobsite) as well as networking platforms (e.g. LinkedIn).



Automated Decision Making

We do not undertake automated decision making or profiling. We do use our computer systems to search and identify potential candidates and persons using personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

Candidate's CV/Resume

Once a candidate provides their CV/Resume to ALLEN & YORK it will be made available to our specialist recruitment teams.

Marketing

ALLEN & YORK may communicate by sending mailshots containing industry news updates, upcoming events/conferences, job opportunities and recruitment services to our mailing lists. Our mailing lists are sourced from our in-house database, membership sites and networking platforms (e.g. LinkedIn). We will never sell, trade or rent personal information to third parties.

Retention of your data

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so. Accordingly, we have a data retention notice.

We do the following to try to ensure our data is accurate:

- Website registration enables candidates to manage their data and to review whether the details we hold about them are accurate.
- Prior to making an introduction we check that we have accurate information about each candidate.
- We keep in touch with candidates and clients, so they can let us know of changes to personal data.



- We segregate our data so that we keep different types of data for different time periods.

The criteria we use to determine whether we should retain personal data includes:

- The nature of the personal data.
- Its perceived accuracy.
- Our legal obligations.
- Whether an interview or placement has been arranged; and
- Our recruitment expertise and knowledge of the industry by country, sector and job role.

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

Our current retention notice is available upon request.

From 25th May 2018, it is our policy to retain records for 6 years. Thereafter if no activity has taken place the record will be deleted, or pseudo anonymised, as appropriate, within our systems.

Disclosure of your information inside and outside of the EEA

On occasion your details may be presented to candidates or clients outside the European Economic Area. This could happen, for example, if a candidate applies for a vacancy where the employer is based outside the EEA.

We will share your personal information with:

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Any member of our group both in the EEA and outside of the EEA.

Selected third parties including:

- Clients for the purpose of introducing candidates to them.
- Candidates for the purpose of arranging interviews and engagements.
- Clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you.
- Subcontractors including email marketing specialists, event organisers, payment and other financial service providers.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Credit reference agencies, our insurance broker, compliance partners and other sub-contractors for the purpose of assessing a candidate's suitability for a role where this is a condition of entering into a contract.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If ALLEN & YORK Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply of services (as detailed on our website www.allen-york.com) and other agreements; or to protect the rights, property, or safety of ALLEN & YORK Ltd our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The lawful basis for the third-party processing will include:

- Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs.
- Satisfaction of their contractual obligations to us as our data processor.
- For the purpose of a contract in place or in contemplation.



- To fulfil their legal obligations.

Consent

By registering on our website, candidates will be required to provide consent for the use of the data they provide.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie notice <https://www.volcanic.co.uk/blog/2018/02/gdpr-fags-cookies>

Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your personal data for marketing purposes.

The GDPR provides you with the following rights. To:

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.



- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party in certain formats, if practicable.
- **Make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

Access to information

The Data Protection Act 1998 and the GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete.

Your right of access can be exercised in accordance with the Act (and the GDPR once it is in force).

A subject access request should be submitted to dpo@allen-york.com No fee will apply once the GDPR comes into force.

Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to dpo@allen-york.com

Data Protection Officer

ALLEN & YORK's named Data Protection Officer is Jenna Udall.

Jenna can be contacted via the office number or on email at dpo@allen-york.com

Should you wish to lodge a formal complaint with a supervisory authority, please visit www.iso.org.uk



Deletion Request

Please email withdraw@allen-york.com if you would like your information deleted.

Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.