



Privacy Notice

Gleeson Futures Ltd (“We” “Us” “Our”) are committed to protecting and respecting your privacy and maintaining the security of any Personal Information received from you. We strictly adhere to the requirements of relevant UK legislation.

Our Group means our limited company, its subsidiaries, and our associated companies as defined in section 1159 of the UK Companies Act 2006 (our Group).

This notice, together with our terms of business, set out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Even though the UK has left the EU, the GDPR remains applicable in the UK through its implementation via the Data Protection Act 2018.

Your rights under the GDPR are set out in this notice.

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

For the purposes of data protection legislation in force from time to time, the data controller is Gleeson Futures Ltd of 8th Floor Edmund House, 12-22 Newhall Street, Birmingham, B3 3AS.

Our nominated Data Protection Manager is Nicola Ryder.

Who we are and what we do

We are a recruitment agency and recruitment business as defined in the Employment Agencies Employment Businesses Regulations 2003 (our business). We also provide the following other related services including outplacement and psychometric testing. We collect the personal data of the following types of people to allow us to undertake our business:

- Website Users;
- Prospective and placed candidates for permanent or temporary roles;
- Prospective and live client contacts;
- Supplier contacts to support our services;
- Employees, consultants, temporary workers

We collect information about you to carry out our core business and ancillary activities.





Information you give to us or we collect about you

This is information about you that you give us by filling in forms on our website www.gleeson-futures.com or by corresponding with us by phone, e-mail, or otherwise. It includes information you provide when you register to use our site, to enter our database, apply to vacancies we advertise online, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem or concern.

The information you give us or we collect about you may include your name, address, private and corporate e-mail address and phone numbers, financial information, compliance documentation and verification of your qualifications, experience and right to work, curriculum vitae and photograph, and links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

Information we collect about you when you visit our website, and use of cookies

With regard to each of your visits to our site, we collect your data automatically via cookies when you visit our website, in line with cookie settings in your browser. We use 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. We will also collect data from you when you contact us via the website, for example by submitting your registration details.

Our website may also use services which can record online activity such as which areas and services users access most frequently. Data collected in this manner is used to improve our website usability and aid development of the services we provide.

Information we obtain from other sources

This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, and personal recommendations. We work closely with third parties including companies within our Group, business partners, sub-contractors in technical, professional, payment and other services, advertising networks and job boards, analytics providers, search information providers, credit reference agencies, and professional advisors. We may receive information about you from them for the purposes of our recruitment services and ancillary support services.

Purposes of the processing and the legal basis for the processing

We use information held about you in the following ways:

- To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products, and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.
- To provide you with information about other goods and services we offer that are similar to those that you have already purchased, been provided with, or enquired about.





- The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary or permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation, and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation, or any other contract to provide services to you, or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold and share information on to you to fulfil our legal obligations, for example in connection with the detection of crime or the collection of taxes or duties.

We will, in some circumstances, rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate).

Our Legitimate Business Interests

Our legitimate interests in collecting and retaining your personal data are 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 maintain our business relationship, support our candidates' career aspirations, and support 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.

To deliver our ancillary services such as psychometric testing on behalf of clients.

Consent

Should we want or need to rely on consent to lawfully process your data, we will request your consent orally, by email, or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing, you have the right to withdraw your consent to this particular processing at any time.

Other uses we will make of your data:

- Use of our website;





- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer

We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, and statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- We do not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision making process.

Disclosure of your information inside and outside of the EEA

We will share your personal information with:

- 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, and payment and other financial service providers
 - advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day. We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience];]
 - 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 your suitability for a role where this is a condition of us entering into a contract with you.

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 Gleeson Futures Ltd or substantially all 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 Business, Contracts of Services, Contract of Employment and other agreements; or to protect the rights, property, or safety of our Group, 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.

Where we store and process your personal data

The data that we collect from you may/will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may/will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

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 you are happy for us to do so. Accordingly, we have





a data retention notice and run data routines to remove data that we no longer have a legitimate business interest in maintaining.

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

- prior to making an introduction we check that we have accurate information about you
- we keep in touch with you so you can let us know of changes to your personal data

We are also enhancing our websites to allow you to manage your data and to review whether the details we hold about you are accurate.

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 your personal data includes:

- the nature of the personal data;
- its perceived accuracy;
- our regulatory and 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 anonymise or pseudonymise parts of your data, particularly following a request for suppression or deletion of your data.

Wherever possible, we will make efforts not to re-enter your personal data onto our database, unless requested to do so. For example, re-registering or applying to vacancies on our website may lead to the processing and retention of your data again.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms. Anonymisation makes records anonymous by removing or preventing access to names and other details that could lead to identification (such as date of birth or NI number).

Our current retention notice is available upon request.

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.

You can exercise your right to accept or prevent such processing at any time by contacting us at compliance@workwithglee.com.

Our site 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.

The Data Protection Act 2018 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 2018 gives 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.

A subject access request should be submitted to compliance@workwithglee.com. No fee will apply.

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.

Contact

Questions, comments, and requests regarding this privacy notice are welcomed and should be addressed to compliance@workwithglee.com.

