

## PRIVACY POLICY

<b>Company Name:</b>	Zebra Consultancy Ltd ('the Company')
<b>Company Contact details:</b>	Sarah Da Silva
<b>PN</b>	Privacy Notice (including for use on the company website)
<b>Topic:</b>	Data protection
<b>Date:</b>	01.01.2019
<b>Version:</b>	1

The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with this privacy statement. At all times we will comply with current data protection laws.

### Contents

1. Collection and use of personal data
  - a. Purpose of processing and legal basis
  - b. Legitimate interest
  - c. Statutory/contractual requirement
  - d. Recipients of data
2. Information to be provided when data is not collected directly from the data subject
  - a. Categories of data
  - b. Sources of data
3. Overseas transfers
4. Data retention
5. Your rights
6. Automated decision making
7. Cookies
8. Login files
9. Links to external sites
10. Sale of the business
11. Data security
12. Changes to this privacy statement
13. Complaints or queries

## **1. Collection and use of personal data**

### **a. Purpose of processing and legal basis**

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

If you have opted-in we may also send you potential role information and news via email/ text. You can opt-out from receiving these at any time by clicking “unsubscribe” when you receive these communications from us.

In some cases we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

- Your consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you

### **b. Legitimate interest**

This is where the Company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Managing our database and keeping work-seeker records up to date;
- Providing work-finding services to you and our clients;
- Contacting you to seek your consent where we need it;
- Giving you information about similar products or services that you have used from us recently;

### **c. Statutory/contractual requirement**

The Company has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements.) Our clients may also require this personal data, and/or we may need your data to enter into a contract with you. If you do not give us personal data we need to collect we may not be able to continue to provide work-finding services to you.

#### **d. Recipient/s of data**

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Clients (whom we may introduce or supply you to)
- Former employers whom we may seek references from
- Other recruitment agencies in the supply chain

### **2. Information to be provided when data collected not from the data subject]**

**Categories of data:** The Company has collected the following personal data on you:

*Personal data:* [not an exhaustive list – please complete]

- Name, address, mobile no., email
- National insurance no.
- Nationality (through right to work check)
- ID proof

*Sensitive personal data:*

- Health information including whether you have a disability
- Criminal conviction

**Source of the personal data:** The Company sourced your personal data/sensitive personal data:

- From various jobs boards, LinkedIn
- A former employer
- A referee whose details you previously provided to us
- Software providers who we use to support our services including
- Cookies listed in section 7

This information came from a publicly accessible source.

### **3. Overseas Transfers**

The Company will not transfer the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

### **4. Data retention**

The Company will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time. For example, the Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

Where the Company has obtained your consent to process your data, we will do so in line with our retention policy. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your data.

## 5. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your CV you have the right to withdraw that consent at any time by contacting Sarah Da Silva at [sarah@zebraconsultancy.co.uk](mailto:sarah@zebraconsultancy.co.uk). Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where the Company will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.

If you believe that any of your data that the Company processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

**You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.**

## 6. Automated decision-making

**Not applicable**

## 7. Cookies

We may obtain data about you from cookies. These are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies also enable us to deliver more personalised content.

## How long are cookies stored for?

Persistent cookies - these cookies remain on a user's device for the period of time specified in the cookie. They are activated each time that the user visits the website that created that particular cookie.

Session cookies - these cookies allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience.

You can find more information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

## Cookies used on the Website

A list of all the cookies used on the Website by category is set out below.

### Strictly necessary cookies

These cookies enable services you have specifically asked for. These cookies are essential in order to enable you to move around the Website and use its features, such as accessing secure areas of the Website.

### Performance cookies

These cookies collect anonymous information on the pages visited. By using the Website, you agree that we can place these types of cookies on your device.

These cookies collect information about how visitors use the Website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how the Website works.

### Functionality cookies

These cookies remember choices you make to improve your experience. By using the Website, you agree that we can place these types of cookies on your device.

These cookies allow the Website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

## 8. Log Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

## 9. Links to external websites

The Company's website may contain links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Company's website.

## 10. Sale of business

If the Company's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

## 11. Data Security

The Company takes every precaution to protect our users' information in the form of firewalls, browser certification technology, encryption, limited access, use of passwords

Only employees who need the information to perform a specific job i.e., Sarah Da Silva and our IT providers, are granted access to your information.

The Company uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/ the Internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/ the Internet.

If you share a device with others we recommend that you do not select the "remember my details" function when that option is offered.

**If you have any questions about the security at our website, you can email Sarah Da Silva at [sarah@zebraconsultancy.co.uk](mailto:sarah@zebraconsultancy.co.uk).**

## 12.Changes to this privacy statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.

## 13.Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Sarah Da Silva at [sarah@zebraconsultancy.co.uk](mailto:sarah@zebraconsultancy.co.uk).

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.