

GDPR – DATA PRIVACY NOTICE

Company Name:	Zenith People Ltd
Process Name	Privacy Notice

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 the terms of the following statement.

1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company has collected 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.

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.

The legal bases we rely upon to offer these 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. Categories of data

The Company has collected the following personal data on you:

- Personal data:
- [Name/contact details]

- [Identification number]
- [Location data]
- [An online identifier] or to one or more factors specific to the
- [physical, physiological, genetic, mental, economic, cultural or social identity of that natural person]

Sensitive personal data:

- [Disability/criminal conviction]
- [Race or ethnic origin]
- [Political opinions]
- [Religious or philosophical beliefs]
- [Trade union membership] and the processing of
- [Genetic data, biometric data]
- [Data concerning health]
- [An individual sex life or sexual orientation]
- [An individual criminal conviction]

c. 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 are as follows:

- Managing our database and keeping work-seeker records up to date;
- Contacting individuals to seek your consent where we need it;
- Providing work-finding services to individuals, including sending information to relevant clients where work in which you are interested is potentially available;
- Contacting individuals with information about similar products or services that they have used from you recently; and
- Passing work-seeker's information to debt collection agencies and other legislatively required third parties.

d. Recipient/s of data

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

- Payroll organisations if appropriate to your payment situation

e. Statutory/contractual requirement

Your personal data is a statutory/contractual requirement. Recruitment businesses must collect certain personal data to meet statutory obligations, such as the Conduct of Employment Agencies and Employment Businesses Regulations 2003 – for example, we have to check identity, right to work, suitability for the role, qualifications and experience.

You are obliged to provide Zenith with personal data in order for us to make introductions to a client and complete checks otherwise we will not be able to carry out the recruitment process.

2. 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.

3. 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.

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.

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

Where the Company has obtained your consent to process your personal and/or sensitive 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 personal and/or sensitive data.

4. 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 personal and/or sensitive data you have the right to withdraw that consent at any time by contacting the Business Support Manager, Nicola Jeavons, at nicolajeavons@zenithpeople.com or on 0191 490 6766.

There may be circumstances where the Company will still need to process your data for legal or official reasons. We will inform you if this is the case. Where this is the case, we will restrict the data to only what is necessary for the purpose of meeting 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.

5. Source of the personal data

If you did not provide your personal data/sensitive personal data directly then your details will have been sourced by one of the following means:

- Our website (not publicly accessible)
- An internet Jobs Board (publicly accessible)
- Social Media Platforms
- Referrals

6. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact Nicola Jeavons, Business Support Manager, Zenith People Ltd, 10 Merchant Court, Monkton Business Park South, Hebburn, NE31 2EX. 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.