


CORPORATE DOCUMENT			
	Department:	Legal	Effective Date: 06/2021
	Controlled		Author: Katie Hancock
Review Date:	06/2022	Related Docs:	Privacy Policy Data Retention Policy
PRIVACY NOTICE – Candidates & Clients			

Purpose and Scope

Anderselite Ltd is committed to protecting the privacy and security of your personal information.

This Privacy Notice describes how we collect and use personal information about you, in accordance with the relevant data protection legislation in force from time to time.

Anderselite Ltd is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Notice.

We are a recruitment agency and recruitment business. This Privacy Notice applies to our candidates and other people we may have contact with to find out more about our candidates or whose details have been provided in the event of an emergency.

This Privacy Notice applies in relevant countries throughout our international network. Different countries may approach data protection in a different way and so we also have a country specific terms within this Privacy Notice, which you can find [here](#).

This Privacy Notice does not form part of any contract. We may update this notice at any time.

Principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.


Information Recorded

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).

There are “special categories” of more sensitive personal data which require a higher level of protection. We only hold this type of data in relation to candidates.

We will collect, store, and use the categories of personal information set out below. The lists are not intended to be exhaustive and not every category of information will apply to you:

- Name
- Address
- Email address
- Telephone number
- Age/date of birth
- Birth certificate
- Proof of name change
- Sex/gender
- Marital status
- Education details
- CV/work history

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PRIVACY NOTICE – Candidates & Clients			

- Job preferences including role, geographical areas and salary
- Any other work-related information you provide for example, education or training
- Proof of qualifications or training
- Industry registration
- Emergency contacts and details of any dependants
- Referee details
- A copy of your passport/identity card
- Permits and visas
- Immigration status
- Nationality/citizenship/place of birth
- A copy of your driving licence
- National insurance number
- Full details of job offer and placements
- Outcome of criminal record checks and security clearance for certain roles
- Diversity information including racial or ethnic origin, religion or similar beliefs, physical or mental health including disability related information
- Medical information
- References
- Details of current remuneration package and benefits
- Financial information (including but not limited to payroll details and terms, HMRC data, pension scheme details, Court orders and statutory payments)
- Any extra information you tell us, your references tell us, our clients tell us or from third party sources such as job board
- A log of our communications with you by email and telephone
- CCTV footage if you attend our premises
- Mobile phone call recordings for safety critical roles
- Tracking information from commercial vehicles


This information will have been collected by us in the following ways:

- Provided by you directly through our website, application forms or registration process.
- Provided by a third party who we work with such as a job board company or another employment business or our clients.
- Other third-party searches such as LinkedIn and other job sites.
- If you like our page on Facebook or follow us on Twitter we will receive information from these sites.
- Your references will be provided by your previous employers or other named referees.
- Medical information may be supplied by your doctor, consultant or occupational health.
- Criminal record checks and security clearance, where relevant, will be supplied by the Disclosure and Barring Service or other external company applicable to the placement.

If you fail to provide certain information when requested, we may not be able to provide our services as an employment business or perform the contract we have entered into with you (such as paying you), where applicable, or may be prevented from complying with our legal obligations (such as health and safety).

In order to provide services as an employment business and progress opportunities for individuals we will also be provided with personal data about individuals by candidates. This includes but is not limited to referee details and emergency contact details. The information held will be limited to contact details such as name, address, email address and telephone number.

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PRIVACY NOTICE – Candidates & Clients		

Client Data

The information we hold in relation to client data is to enable us to provide our services to them as an employment business. This data will be limited and will include:

- Name
- Telephone number
- Email address
- Place of work address

This information is usually provided by:

- The individuals themselves
- By third parties e.g. candidates
- From market research

How personal information is used

We will only use your personal information where the law allows us to. The tables below explain what we process your data for and the legal basis for this.

Candidates

Most commonly we will use your personal information in the following circumstances:

- Where we need to perform the contract, we have entered into with you
- Where we need to comply with a legal obligation
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override these interests

“Special Categories” of particularly sensitive data require higher levels of protection. For the purpose of this Notice this includes criminal convictions. We need to have further justifications for processing this type of data. We may process this type of data in the following circumstances:

- With your explicit written consent
- Where we need to carry out our obligation or exercise rights in connection with employment law
- Where it is needed in the public interests such as equal opportunity monitoring

Less commonly we may process this information where it is needed in relation to legal claims.

What We Use Your Personal Data For	Legal basis
Collecting your data from you and other sources	Consent
Storing your details on our database	Consent
Providing you with our recruitment services and to facilitate the recruitment process	Consent
To match your skill sets with job vacancies	Consent
To put forward your details to our clients and prospective employers for you to be considered for vacancies	Consent
To place you with our clients and prospective employers	Consent
To keep you informed of available opportunities as they arise	Consent

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PRIVACY NOTICE – Candidates & Clients

What We Use Your Personal Data For	Legal basis
Checking you are legally entitled to work in the UK	To comply with our legal obligations
To put in place contractual arrangements and documentation once a role has been secured	To comply with our legal obligations.
For the performance of our contract with you	To perform the contract and to comply with our legal obligations
To facilitate our payroll and invoicing process	To perform the contract and to comply with our legal obligations
To administer and/or manage your placement	Our legitimate interest namely to provide a service to our clients
What We Use Your Special Personal Data For	Legal basis
To undertake relevant security and criminal record checks as required by our clients and prospective employers	To comply with our legal obligations in connection with employment law and/or with your explicit consent
To deal with any medical and health and safety issues arising in relation to certain positions	To comply with our legal obligations in respect to employment law and/or your explicit consent
Equal opportunities monitoring and compliance with discrimination law	To comply with our legal obligations (or in public interest)
To help us establish to exercise, establish or defend legal claims (this could involve personal data and special data)	Our legitimate interests i.e. defending a claim and as it is necessary for dealing with claims

Other personal data received from candidates


What We Use Your Personal Data For	Legal basis
To contact individuals in an emergency	For our legitimate interests i.e. to ensure an emergency situation is properly managed
To obtain references	For our legitimate interest – to ensure we offer a good service to our clients to check credentials

Clients

What We Use Your Personal Data For	Legal basis
To enable us to contact our clients	For our legitimate interest – to enable us to offer our services to clients

Data Sharing

We will only share your personal information where it is required by law, where it is necessary to administer the working relationship with you, where we have another legitimate or we have your consent.

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PRIVACY NOTICE – Candidates & Clients			

We may share your information with the following third parties:

- Prospective employers and our clients with your consent to secure a placement and if you are successful to enable the placement to proceed.
- To clients to enable them to deal with operational matters in relation to your placement.
- To clients to enable them to conduct audits for compliance purposes.
- Any of the companies with the Group to find you a role and/or for administrative purposes.
- HMRC for tax reasons
- Pension providers to facilitate access to the scheme
- External companies for the purpose of undertaking criminal record or security clearance checks, where required by law or where your consent has been obtained
- External companies for the purpose of paying you
- To previous employers or other nominated referees for the purpose of obtaining a reference
- To legal advisors to establish, exercise or defend legal claims
- To a new owner of the business should we merge or be acquired by another business
- Service Providers, if any, who perform functions on our behalf and where applicable a relevant processing agreement is in place, including, for example, lawyers.

Referees personal data will be shared with any company within the Group, Service Providers and clients we provide services to.

Client personal data will be shared with any company within the Group, Service Providers and clients we provide services to.

Data Security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.


We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures can be found in the security policies.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Retention

We will only retain your personal information 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. Details of retention periods are available in our data retention policy which is available from SharePoint. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

For candidates where you are not in an active engagement, we will seek your consent to continue to hold your data every 2 years if you are looking for temporary work or every year if you are looking for permanent work. After this period, it is likely that your data will no longer be relevant and it will be deleted subject to any legal requirements we have to hold your data.

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PRIVACY NOTICE – Candidates & Clients			

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a contractor of the company we will retain and securely destroy your personal information in accordance with our data retention policy.

Rights of Access, Correction, Erasure and Restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **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.

For all matters, including access requests to your personal information you should email dpo@anderselite.com

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.#


Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact dpo@anderselite.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Compliance

Our Safety & Compliance Manager oversees compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Safety & Compliance Manager. 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.

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Changes to Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the Safety & Compliance Manager.