# PRIVACY AND COOKIES POLICY

#### PRIVACY POLICY FOR BOND SEARCH & SELECTION LTD

The aim of this policy is to let you know about the types of personal data we collect from candidates, the purpose for which this data is used and the way we handle this data. It also informs you of your rights in regards to the data we hold on you.

#### Who We Are

Bond Search & Selection Ltd (referred to as the 'company', 'we', 'us' or 'our' in the following) is a recruitment company based in Belfast Northern Ireland. We provide temporary and permanent recruitment services to clients throughout Ireland and the UK across multiple sectors. For non-healthcare recruitment we operate under the brand name Bond Search & Selection Ltd and for healthcare recruitment we operate under the brand name Bond Healthcare (which is a trading division of Bond Search & Selection Ltd). Bond Search & Selection Ltd is a private limited company registered in Northern Ireland (company number NI047768) and our registered address is 21 James Street South, Belfast, BT2 7GA.

Under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regards to the processing of personal data and on the free movement of such data, known as General Data Protection Regulation (GDPR) we are required to give you certain details as a 'data controller'. As such the aim of this policy is to meet our obligations under this legislation.

Our representative for all GDPR related issues is Jonathan St Clare and he can be contacted by email (<u>jonathan@bondselection.com</u>), telephone (02890 270747), or in writing (please use our registered address detailed above).

Bond Search & Selection Ltd is committed to protecting the privacy of our candidates, clients and users of our websites (<a href="www.bondselection.com">www.bondselection.com</a> and <a href="www.bondhealthcare.com">www.bondhealthcare.com</a>). We will ensure that the information you submit to us, or which we collect, via various channels (including our website, through written correspondence (including e-mail), conversations or meetings with our consultants) is only used for the purposes set out in this policy.

## **The Information We Collect**

We will collect your personal details, including but not limited to your name and contact details (together with your e-mail address) and other relevant information from your Curriculum Vitae ("CV") which may include your work history, referee details, remuneration details and any other relevant information you have provided.

This may also include information categorised as sensitive personal information such as details of ethnic origin, medical history and details of criminal convictions. We will not request any sensitive personal data from you unless it is a requirement of a job application and we will always keep you fully informed if we do require this information and provide an explanation why it is required.

If we receive your CV (or other details) electronically this may be through a direct application via our websites, an application you have made through a third party website or via a direct email to an employee of the company. Throughout the recruitment process we may gather and record additional information about you either directly (e.g. during an interview) or from third parties such as organisations

to whom we have submitted your CV (e.g. we may receive feedback on your CV, or feedback following an interview).

#### How Your Personal Information Is Used

We will hold, use and disclose your personal information, for our legitimate business purposes including:

- To enable us to provide recruitment services to you and assist in your job search
- To develop and maintain a business relationship with you when you are a user of our website
- To inform you of relevant job opportunities as they arise
- To match you to relevant jobs and to assist us in finding you appropriate job roles
- To submit your CV for general job applications and specific job applications (we will never submit your CV to a client without your permission)
- To keep you informed of future relevant job vacancies (by email, telephone or in writing) as they arise in addition to any specific job role for which you may have applied
- To enable us to fulfil our contractual obligations to our clients
- To meet regulatory or law enforcement requirements where required legally to do so

We may process certain sensitive personal data (known as special category data in GDPR) where you include it in information you send to us e.g. if you include information about your health, religion or ethnic origin in the CV you send to us.

We may also be required to conduct a criminal records check against your details. We have processes in place to limit our use and disclosure of such sensitive data other than where permitted by law.

## The Legal Basis for Processing Your Information

GDPR details a number of ways in which we have a legal right to process your personal data. The main grounds we rely on to process the information of both candidates and clients are as follows:

## 1) Legitimate Interest

In order to assist you in your job search or in order to provide career advice we (or on occasion a third party) will need to process your personal data for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your personal data protected. Our legitimate interests include responding to requests and enquiries from you or a third party, optimising our website and customer experience, informing you about our products and services and ensuring that our operations are conducted in an appropriate and efficient manner;

## 2) Necessary for Entering Into or Performing a Contract

In order to perform obligations that we undertake in providing a service to you, or in order to take steps at your request to enter into a contract with us, it will be necessary for us to process your personal data;

# 3) Necessary for Compliance with a Legal Obligation

We are subject to certain legal requirements which may require us to process your personal data. We may also be obliged by law to disclose your personal data to a regulatory body or law enforcement agency;

# 4) Consent

In some circumstances, we may ask for your consent to process your personal data in a particular way.

#### **How Your Personal Information is Shared**

We will share your personal information with clients (employers) who have job vacancies which we have established you have an interest in pursuing.

For temporary workers we will share basic information (e.g. address details, bank details etc.) with our payroll provider (Back Office Support Services) to enable them to process wage payments. We will only share the minimum amount of information required to enable them to undertake their duties effectively. We may share your details with other trusted third parties where the service they provide is requested by our clients or by you (this information may include the sharing of sensitive personal data). Examples include:

- Checking qualifications
- Security clearance checking
- Skills testing

Your personal data is not shared or transferred outside the European Union.

#### **New Business Owners**

If the company is acquired by new business owners we will share your information with them. You will be notified if such an event is to occur.

#### **How Long Will We Retain Your Information**

This will depend on the services we provide and how long you require our services. We often work with candidates for many years and hence we retain data for an ongoing purpose. We will regularly update and cleanse our data and our aim is to ensure our data is accurate and that we are not holding it for longer than you wish us to. The next section details the rights you have over the data we hold.

## **Your Rights Regarding Your Personal Data**

Please note that to exercise any of the rights detailed below the company will need to be provided with proof of your identity. Please contact us by any of the methods detailed in the contact section below to exercise any of these rights.

# The Right to be Informed

The purpose of this privacy policy is to make sure you are informed as to how and why we process your information.

## The Right of Access

You have the right to request a copy of the personal information we hold on you at any time. If we have a reason not to provide this information or to only partly provide this information we will give you our reasons for doing so.

You have the right at any time to ask us for a copy of the personal information about you that we hold. Where we have good reason, and if the GDPR permits, we can refuse your request for a copy of your personal information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so. There is no charge for requesting information and we will respond to all requests as quickly as possible and always within 1 month.

## The Right to Rectification

If the data we hold on you is not accurate or is incomplete you have the right to have that data rectified, corrected or completed. Please contact us by telephone, email or in writing to exercise your right to rectification. You will be informed of the action we have taken to rectify your information.

## The Right to Erasure

In certain circumstances, you have the right to request that personal information we hold about you is erased:

- If the information is no longer necessary for the purposes for which it was collected or processed
- If you withdraw consent when the processing of the information is based on your consent and there are no other legal grounds on which we may process the information.
- If the information was unlawfully processed
- If there is a legal reason

This right is also known as the 'Right to be Forgotten'.

## The Right to Restrict Processing

Under certain circumstances you have the right to restrict our use of your personal information, which means whilst we still hold your data we cannot process this data for the period of the restriction. This may occur, for example, during a period where your data is being corrected or updated.

## The Right to Data Portability

In certain circumstances you have the right to receive the personal information we hold on In certain instances, you have a right to receive any personal information that we hold about you in a structured, commonly used and machine-readable format.

You can ask us to transmit that information to you or directly to a third party organisation. The above right only applies to personal data:

- Which you have provided to us previously
- Where you have previously given consent or where the data is being processed for the performance of a contract
- When processing is carried out by automated means

While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third party organisation's systems. We are also unable to comply with requests that relate to personal information of others without their consent.

# The Right to Object

You have the right to object to our use of your personal data, for example, to prevent us from using your information for direct marketing purposes. In certain circumstances, however, we may be able to continue to process your data despite your objection. We will always explain our reasons if this is the case.

## Rights in Relation to Automated Decision Making and Profiling

We do not use your personal information to make any automated decisions as defined by GDPR legislation. If this changes we undertake to inform you of the change and explain how this change would affect you and the use of your personal information.

#### Consent

To the extent that we are processing your personal information based on your consent, you have the right to withdraw your consent at any time. You can do this by contacting us using the details in the contact section below.

#### **Curriculum Vitae**

You can submit your CV to us in multiple ways. These include email, post, by applying for a vacancy on our website or a third party website or by providing a copy directly to one of our consultants. Your CV will be stored in our database which is accessible by our recruitment consultants. You can submit an updated CV to us at any time.

Your CV will not be forwarded to any of our clients without your permission. We will not share your CV with any other third parties.

# **How to Complain**

You can complain at any time if you are unhappy about the use of your personal information. Please use the details in the Contact section below.

You are also entitled to lodge a complaint with the UK Information Commissioner's Office using any of the below contact methods:

Telephone: 0303 123 11113

Website: <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Information Transferred Via the Internet/Web

Whilst we take every step to ensure the security of your data please be advised that the transmission of all internet/web based data is at your own risk.

# **Changes to our Privacy Policy**

This privacy policy can be changed by the company at any time. If we change our privacy policy in the future, we will advise you of material changes or updates to our privacy policy by email, where you have provided us with your email address.

#### **Equal Opportunities**

Bond Search & Selection Ltd is an equal opportunities employer and a company committed to diversity. This means that all job applicants and members of staff will receive equal treatment and that we will not discriminate on grounds of gender, marital status, race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion or age.

As part of our commitment to equal opportunities we will from time to time use information provided by you for the purposes of diversity monitoring. All such information will be used on an anonymised basis.

# Contact

You may contact us by email, telephone, in writing or in person. Our contact for all privacy issues including GDPR is Jonathan St Clare, a director of Bond Search & Selection Ltd.

E: gdpr@bondselection.com

T: 02890339968

A: 21 James Street South, Belfast, BT2 7GA

#### **Cookies**

Cookies 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, such as the number of visitors. Most websites use cookies. We use cookies to give you the best online experience. By using this website you agree to our use of cookies in accordance with our privacy and cookies policy.

#### Which cookies does this website use?

The most common type of cookie used on this web site is set by Google Analytics, which provides anonymous statistical data to us to show usage trends and to aid in making decisions about what types of content are most popular. We do not use cookies to collect or track any personal information relating to you.

## **Session cookies**

We use a temporary session cookie to store information as you use this website. This does not collect any personal information and is used only to improve the functionality of features such as the service searches etc. This cookie is deleted once you close your browser.

#### Other cookies we use

We use four Google Analytics cookies on this website (named utma, utmb, utmc and utmz) to track how you use this website and help us to identify visitor trends such as most popular searches, the time of day that the website is most frequently used etc. None of the information collected by these cookies can personally identify you.

We use a cookie called has\_is to let us identify if you have javascript enabled in your browser. This makes it easier for us to provide search functionality that best suits your computer setup.

Finally we store a cookie named cookie\_agreed\_en. The purpose of this is let us know if we have displayed the cookie policy message to you previously and, if it has been displayed, to hide the message thereafter.

# Third party cookies

A number of third party services may store cookies when using this website. These include LinkedIn and Facebook. The cookies they store allows you to share jobs on Facebook with friends or submit applications to us using your LinkedIn profile.

If you have any questions or concerns, please us at <a href="info@bondselection.com">info@bondselection.com</a>.

## Can I delete cookies?

Yes, you can both view the cookies stored on your computer and delete some or all of them. Each web browser has a different procedure for doing so. Here are instructions for deleting cookies in some popular browsers:

http://www.pcworld.com/article/242939/how\_to\_delete\_cookies.html

# Can I set my browser to block cookies?

Yes, most browsers allow you to specify which types of cookies you will accept or to reject all cookies. As each browser is different, here are some of the most common ones:

- <u>Firefox</u>
- Internet Explorer
- <u>Chrome</u>