

POLICIES & PROCEDURES

Privacy Notice

Search is a recruitment business which provides work-finding services to its Clients and Candidates. Search must process personal data (including sensitive personal data) so that it can provide these services – in doing so, Search is responsible for your personal data. Which Search company is responsible for your personal data will be dependent on which of the below companies you have engaged with and on what basis.

Search company that is responsible for processing the personal data of Website Users, Candidates, Clients, and Suppliers
Search Consultancy Limited, ICO Registration no. Z7108441
Search Master Vendor Solutions Limited, ICO Registration no. ZA828864
Search.co.uk Limited, ICO Registration no. Z1450780
Search Consultancy Group Limited, ICO Registration no. Z530375X

Hereinafter “**the Company**”.

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 Notice.

Please note that this Notice will be subject to amendment as required.

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1. DEFINITION

“**Candidate(s)**” means any individual who registers with the Company for the purposes of obtaining permanent/fixed term employment or temporary work.

“**Client(s)**” means any organisation and individual/employee of that organisation that the Company provides recruitment services to.

“**Data Protection Legislation**” means all applicable data protection laws including the Data Protection Act 2018 and the General Data Protection Regulation (EU/2016/679) (GDPR).

“**personal data**” *means any information relating to an individual who can be identified, such as by a name, an 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.

“**process/processing**” means any operation or set of operations performed on personal data, such as collection, recording, organisation, structuring, storage (including archiving), adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“**special category data**”, previously known as “sensitive personal data”, means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data, data concerning health and information about an individual's sex life or sexual orientation.

* For the purposes of this policy we use the term “**personal data**” to include “**sensitive personal data**” except where we specifically need to refer to sensitive personal data.

“**Supervisory authority**” means an independent public authority which is responsible for monitoring the application of data protection. In the UK the supervisory authority is the Information Commissioner's Office (ICO).

“**Supplier(s)**” means any organisation and individual/employee of that organisation that provides services to the Company.

2. COLLECTION AND USE OF PERSONAL DATA

2.1 Categories of personal data that may be collected

The categories of personal data the Company may collect will depend on the type of contact you have with us.

If you use the Company website then we may collect other data from you such as the dates and times that you used it. For more information, please see Section 6 - Use of the Company Website.

It is important that the personal data we hold about you is accurate and current. Please inform us if your personal data changes.

For the avoidance of doubt, the below categories of personal data are not exhaustive.

2.1.1 Candidates

If you are a Candidate, the Company may collect the following personal data:

- Name
- Date of Birth
- Marital Status
- Emergency Contact/Next of Kin
- Home Address
- Email address
- Telephone number
- CV/Work history
- Education or Training
- Employment History
- Referee details
- Photographic ID
- Nationality
- Immigration/right to work status
- Record of criminal convictions
- Sensitive personal data such as sex/gender, ethnicity, physical or mental disabilities, religious beliefs and sexual orientation
- Details regarding your current salary and bank account
- Any additional information that you, your referees or our Clients may provide about you.

2.1.2 Clients

If you are a Client, the Company may collect the following personal data:

- Contact details for you and individuals/employees of your organisation such as name, work address, email address and telephone number
- Details about previous and current job requirements

2.1.3 Suppliers

If you are a Supplier to the Company, the Company may collect the following personal data:

- Contact details for you and individuals/employees of your organisation such as name, work address, email address and telephone number

- Bank account details

2.2 How we use your personal data

The Company may use your personal data for different reasons. If you are a client seeking workers, an individual seeking work or a supplier to our business, we need to use personal data in order to perform our contract with you and to enable us to comply with related legal obligations. We may use your personal data on the basis of legitimate interests, provided your interests and rights do not override those interests. We will only use your personal data for the purposes for which we collected it, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose. We will notify you if we want to use the data for any different purposes and will explain the legal basis that allows us to do so. Below is a non-exhaustive list of the uses the Company may have for your personal data.

Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law. Please also note that we may not be able to provide certain services to you if you do not make relevant information available.

2.2.1 All website users

In order to provide information about our services, reply to enquiries and enter into new relationships, we will use personal data in various ways, usually on the basis of our legitimate interests of in negotiating a contract we need to perform:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Creation and management of online user accounts	Name, email address	Necessary to provide our services
Contacting you with service messages or to respond to any enquiries or complaints you may have	Name, email address; information you may share in connection with an enquiry or complaint	Legitimate interest in bringing key service messages to your attention and also in ensuring good customer service
Contacting to you to promote opportunities, services or events you may find useful	Name, email address	(a) Legitimate interest for client contacts (b) Consent, where individuals have signed up for such mailing list options
To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.	IP addresses, device information and other online identifiers	Legitimate interest in providing secure online systems and protection of data
To collect and analyse information about your use of our services and ensure	Data collected by cookies in use on our website (see section	(a) Legitimate interest for essential cookies needed for our website to

you are easily able to navigate our website.	6 below for more information)	function (b) Consent, if cookies are non-essential
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2.2.2 Candidates

If you are a Candidate, in addition to the general website use processing above, the Company will process your personal data for the purposes of providing you with work-finding services and managing our relationship. This service will include providing you with job recommendations and submitting your application to potential employers. The Company may also use your personal data for marketing purposes. The Company may also use your personal data for Equality and Diversity Monitoring or as required by law, regulatory bodies or for tax or audit purposes

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To put you forward for relevant assignments in which you express an interest	Name, contact details, date of birth; work and education history; any information you have made available that is relevant to client requirements for the assignment	Performance of a contract
To undertake any necessary identification and eligibility to work checks, including contacting any referees you have notified to us	Name, address, date of birth; work history; identification documents; publicly-available information; any personal data referees may provide	(a) Legal obligation to confirm identification and eligibility (b) Legitimate interest in assisting clients with such checks in connection with a potential assignment
Paying you (and deducting tax and National Insurance contributions (NICs)) and providing other contractual benefits, or assisting clients in undertaking these obligations	Name, addresses; bank details; any health information relevant to benefit provision; contact details and health information relating to other beneficiaries of benefits, if applicable	(a) Legal obligation to deduct at source and report on tax matters (b) Legitimate interest in assisting clients with such obligations
To generate internal reports to analyse efficiency of procedures and improve service provision	Name; details of assignment history via the Company; any feedback provided by you or by clients	Legitimate interest in developing and improving services for both clients and candidates

In monitoring premises security by the use of CCTV	Images/video footage	Legitimate interest in ensuring secure environments for working and training
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2.2.2 Clients

If you are a Client, in addition to the general website use processing above, the Company will process your personal data for the purposes of providing you with recruitment services as per our agreed terms of contract and for the purpose of managing our relationship. The Company may also use your personal data for marketing purposes or as required by law, regulatory bodies or for tax or audit purposes.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To take and keep a record of opportunities we are assisting (or have assisted) you with and to provide suitable candidates	Name, email address, telephone number, postal address; any information you may share about your personal requirements for the role or your ways of operating; any information that may be publicly available about your organisation.	(a) Necessary to perform our contract with you (b) Legitimate interest in providing a good service to clients
To liaise with you regarding contract management and payment	Name, email address, telephone number, postal address; bank account details.	Necessary to perform our contract with you
Confirm identity and complete new client due diligence and anti-money laundering checks, along with credit checks where appropriate	Passport, driving licence or other identification documents; Companies House or other publicly-available information about key individuals	(a) Legal obligation (b) Legitimate interest in ensuring new clients are of good credit standing

2.2.3 Suppliers

If you are a Supplier to the Company, in addition to the general website use processing above, the Company will process your personal data to ensure that our agreed terms of contract may be carried out efficiently and effectively and to manage our relationship. The Company may also use your personal data as required by law, regulatory bodies or for tax or audit purposes.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To liaise with you regarding contract management and payment	Name, email address, telephone number, postal address; bank account details.	Necessary to perform our contract with you
Confirm identity and	Passport, driving licence or	(a) Legal obligation

complete new client due diligence and anti-money laundering checks, along with credit checks where appropriate	other identification documents; Companies House or other publicly-available information about key individuals	Legitimate interest in ensuring new suppliers are of good credit standing
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2.2.4 Consent

The Company may request your consent to certain processing activities. In such circumstances, consent must be freely given, specific, informed and unambiguous and you will be provided with a consent form with a specific opt-in option. You may withdraw your consent at anytime. For further information about your rights please see Section 5 – Your Rights.

2.2.5 Special category data

Special category data requires additional protections. Please see above for the definition of sensitive personal data and what type of data the Company may collect. Additional protections also apply to the processing of information about an individual's criminal convictions or involvement in any allegations or crimes.

We may process candidates' special category data: (i) where we need to carry out legal obligations or exercise rights in connection with recruitment for assignments, for example in verifying identity; (ii) where it is needed in the public interest, such as monitoring covid-19 infection rates (including vaccination status) or managing safeguarding concerns if client work relates to vulnerable persons; (iii) in limited circumstances, with your explicit written consent; (iv) where it is needed in relation to legal claims or where you have already made the information public.

We may also use information about candidates' race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, for the purposes of equality and diversity monitoring.

We will only use information relating to criminal convictions or allegations where the law allows us to do so for reasons of substantial public interest. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

2.3 Third parties we may share your personal data with

The Company may share your personal data with our third party service providers where required, such as professional and business advisors like IT consultants, lawyers, auditors and accountants. Any such providers will use your personal data only as required in order to provide agreed services to you. We have a contract in place with such providers to ensure your data is protected and we do not authorise such third parties to use your data for any other purpose (although they may legally be permitted to do so in certain circumstances).

The Company may share your personal data as required by law, regulatory bodies or for tax or audit purposes. Depending on the type of contact you have with the Company, there are additional categories of third parties whom data may be shared with as detailed below.

If you are a Candidate, the Company may also share your personal data with potential employers or with third party recruitment services to assist your search for employment. We may share your personal data with reference agencies where a specific form of reference is required.

If you are a Client, the Company may also share your personal data for the purposes of providing you with recruitment services which may include, with our Candidates or intermediary organisations (such as MSP or RPO), where appropriate.

Please note that the above lists of third parties are not exhaustive and may be updated as required.

Except where we share personal data with service providers on the basis of a contract restricting its use, third parties will be data controllers in their own right and you should refer to their own privacy policies as to how they use your personal data. The Company is not responsible for the actions of such third parties.

3 OVERSEAS TRANSFERS

The Company may transfer your personal data to countries outside the United Kingdom, for example if our servers are hosted overseas. We will take steps to ensure adequate protections are in place to ensure the security of your information. Details of those protections are available on request.

4 DATA RETENTION

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time. If there is no specific legal requirement, 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.

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.

If you are a Candidate or Client, where the Company has had no meaningful contact with you for a period of 3 years, your personal data will be deleted unless we are required to keep it by law, for a regulatory body or for tax or audit purposes.

Please see the Company's Retention Schedule for further information.

5 YOUR RIGHTS

In terms of the Data Protection Legislation, you have the following rights in certain situations – we would be happy to explain whether these rights are available when you have a query:

5.2 Right to be informed

The Company has an obligation to provide you with information on the way your personal data will be stored and used, as detailed in this Notice.

5.3 Right of access

You have a right to access the personal data stored about you. On request, we will provide you with copies of all the information we hold which is relevant to you. This will allow you to assess the accuracy of the information we hold and verify that the information is being used as originally intended and in compliance with the law.

5.4 Right of rectification

Should you discover that some of the personal data we hold is inaccurate, you have a right to have that rectified and any inaccuracies will be amended accordingly. We may also contact any relevant third parties and make them aware of any changes and request that they update their records.

5.5 Right of erasure

If you feel that there is no longer a need for the Company to retain your personal data, you can request that the information be permanently erased from our records.

5.6 Right to restrict processing

There are some instances where erasing personal data will not be desirable or even possible. In this event you may request that we no longer process the information and simply retain for reference purposes only.

5.7 Right to data portability

Should you exercise your right of access, the Company will endeavour to provide any information in a format which is easy to move, copy or format from one IT environment to another. This is to make it easier for you to re-use the information should you wish to do so. Please note that this provision only applies to personal data that is processed via automated systems.

5.8 Right to object

If your personal data is being processed for legitimate interests, direct marketing or for research purposes, you have the right to object.

You must have a reason for objecting to the processing if it is carried out for legitimate interests or for research purposes. In the case of direct marketing, we will promptly stop all direct marketing communications if you inform us that you no longer wish to receive this information.

5.9 Right to not be subjected to automated decision making and profiling

You have the right not to be subjected to decisions based solely on automated processing that have a legal or similarly significant effect upon you, except where the automated decision:

1. is necessary for the entering into or performance of a contract between the Company & you,
2. is authorised by law, or
3. you have given your explicit consent.

The Company does not currently rely on any automated decisions or undertake any profiling activity. We will tell you if this changes.

5.10 Right to withdraw consent

You have the right to withdraw consent to processing of your personal data at any time.

If you wish to enforce any of the above rights please contact the Company at GDPR@Search.co.uk. There will not usually be a fee, unless the query is unusually complex or unfounded. We may first need to undertake an identity check in order to ensure we only share personal data with you or your authorised representative.

6 USE OF THE COMPANY WEBSITE

6.1 Cookies

We use "cookies" - small amounts of information stored on your computer - to allow us to manage and monitor your use of our websites and to identify you when you return to our site. No personal data is stored in our cookies but they provide data to personal data held securely on our Company servers. Most browsers allow you to set them to refuse cookies although by doing so you will not be able to receive a personal service from us.

6.2 Categories of personal data that may be collected

Cookies may obtain information regarding your IP address, the dates and times that you access the website and the search criteria you use to search for roles.

6.3 How do we use the personal data collected

Information that you provide or that is obtained by us through your dealings with the Company website will be held on our servers. The Company may use this information for statistical analysis for the purposes of reviewing, developing and improving the use of the website experience.

The Company will take all reasonable steps to keep information we hold about you secure, however, we cannot guarantee security online.

6.4 Remarketing

We also use remarketing services to advertise on third party websites to all visitors to the Company website. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on individual's past visits.

You can set preferences for how Google advertises to you using the Google Ad Preferences page. If you wish to opt out of interest-based advertising, this can be achieved by amending your cookie settings on your browser.

7 SECURITY

We have in place appropriate technical and security measures to protect your personal data. We only share your personal data with those employees, contractors and other third parties who have a business need to know and are subject to confidentiality obligations. Given the nature of the Internet, we cannot guarantee the security of data transmitted online.

Please note that we are not responsible for third parties who use your personal data for their own purposes. You should refer to the privacy policy of any relevant third party for more information.