

# **Thames Talent Partners Limited Privacy Policy**

This privacy policy (“policy”) explains how your information is collected, used and disclosed by Thames Talent Partners Limited (“we” or “us” or “our”). This policy applies where we are acting as a data controller with respect to the personal data of our website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data. We are committed to safeguarding the privacy of our website visitors and service users. We will never sell, share, or use your personal information other than as described here. By using our service and website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy. This is an important and complex area. To provide guidance and reduce the amount of work you need to do, this document is split into two sections.

## **Section 1**

### **Privacy statement summary**

**Who will use my data?** Thames Talent Partners Limited

**What for?** We will store and process your data in order to allow us to provide our services to you as a recruitment company. We will also send any relevant details to competent authorities and any other organisation that requires them by law.

**What will happen if I contact you?** If you contact us as a candidate looking for work, we will use your information to send you the information that you have requested and updates, job vacancies and other information that we think you will be interested in. If you contact us as a client with possible vacancies to fill or with other related requests, we will use your information to send any requested information as well as updates and other information that we think you will be interested in, as well as updates relevant to the positions advertised.

**What data will be stored?** As an applicant, client, or employee, we will store your personal details such as application forms, identity documents and bank details in order to provide our services to you. We may also collect personal data about you from third parties, such as references supplied by former employers. As a potential employer, we will store any data required in order to provide our services to you and meet any contractual obligations. This might include potential contact information for example.

**What data will be shared?** We will only share any data that is particularly relevant to our process in order to provide the services that we offer. We will only share information with the third parties detailed in this policy.

**How long?** Your data will be stored for up to 5 years following the last interaction we have with you, after which time your data will be archived.

**Who can access my data?** We will never sell, share or otherwise distribute your data to any other third party other than as described here. We will share your information with any regulator or legal body that requests it as well as any parties relevant to the application process. Whether that be client companies with possible vacancies, or applicants to any roles.

**How is my data kept secure?** We will store your data on secure servers which will be accessed in the UK. We use industry standard security protocols/technology to secure your data. Where data is stored or processed outside of the UK we will ensure all appropriate technical, operational, and contractual controls are in place. We take your privacy seriously and will only use your personal information to provide the services you have requested from us and to send you information about services, vacancies and other information you may be interested in. We will never sell, share or use your personal information other than as described here.

## **About this privacy policy**

The general data protection regulation (GDPR) describes how organisations must collect, handle, process and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. GDPR is underpinned by eight important principles. These say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than is necessary
- Processed in accordance with the rights of the data subjects
- Be protected in appropriate ways
- Not be transferred outside the United Kingdom, unless that country or territory also ensures an adequate level of protection

We take these responsibilities seriously; this document describes our approach to data protection. This policy helps to protect us from data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

## **Who we are and how to contact us**

Thames Talent Partners Limited is registered in the uk. and is registered with the Information Commissioner's Office.

## **Who this policy applies to**

This policy relates to data subjects of Thames Talent Partners Limited including clients (potential employers), candidates, workers and employees, and all other individuals. Processing of your data is required in order to offer our recruitment and selection services and to operate and develop our business. This policy applies to individuals who have shared their data with Thames Talent Partners Limited as either a customer, candidate, employee, supplier or in any other capacity and data we collect from other sources such as job boards, and social media. It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Cv / career history qualifications
- Other information as required to provide our recruitment services

## **What this policy applies to**

This section describes the lawful basis for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect.

This includes:

- The information you provide when you contact us
- When you contact us in order to discuss using our services
- When you contact us about data protection concerns
- Information we collect about how you use the website information relating to products and services we offer to you and other transactions including financial and other personal information required to complete these transactions
- Information that is given and stored as part of our ongoing relationship
- Information we collect from other sources such as the internet, social media, commercial databases, other companies, and other third parties
- Information we derive from information we collect about you – for example where we derive your email address from your name and company name

We do not routinely collect or process sensitive data about you however where this is the case we will ensure we keep that data safe as required under article 9 of GDPR.

## **Section 2**

### **Our lawful basis – what this policy applies to**

This section describes the lawful basis for processing your data and applies to all personal information collected, stored, and processed which relates to any individual. We will only use your personal data for the purposes for which we collected it and as you would reasonably expect your data to be processed and only where there is a lawful basis for such processing, for example:

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To register you as a new client	<b>a)</b> Contact details, <b>b)</b> Company details.	<b>a)</b> Performance of a contract with you. <b>b)</b> In our legitimate interests. <b>c)</b> Where we have a legal obligation. <b>d)</b> With your consent.
To register you as a potential candidate	<b>a)</b> Name <b>b)</b> Contact details (email, phone number, address) <b>c)</b> CV, qualifications	<b>b)</b> Performance of a contract with you. <b>b)</b> In our legitimate interests. <b>c)</b> Where we have a legal obligation. <b>d)</b> With your consent.
As a client, to deliver our services you request including recruitment and employment services, managing payments, fees and charges, and managing requests	<b>a)</b> Company details <b>b)</b> Contact details <b>c)</b> Financial. <b>d)</b> Transaction.	<b>a)</b> Performance of a contract with you. <b>b)</b> In our legitimate interests. <b>c)</b> Where we have a legal obligation. <b>d)</b> With your consent.

Purpose/Activity	Type of data	Lawful basis for processing
	e)Marketing and Communications	
As a customer, to deliver our services you request including recruitment and employment services, managing payments, fees and charges and managing requests	a)Name b)Contact details c)Financial. d)Transaction. e)Marketing and Communications	a)Performance of a contract with you. b)In our legitimate interests. c)Where we have a legal obligation. d)With your consent.
To manage our ongoing relationship with you which will include notifying you about changes to our terms, recruitment services, or privacy policy, to maintain our records	a)Identity b)Contact c)Profile. d)Marketing and Communications	a)Performance of a contract with you. b)Necessary to comply with a legal obligation. c)Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services. d)With your consent.
To administer and protect our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data	a)Identity b)Contact c)Technical	a)Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, b)To prevent fraud and in the context

Purpose/Activity	Type of data	Lawful basis for processing
		<p>of a business reorganisation or group restructuring exercise,</p> <p><b>c)</b> Necessary to comply with a legal obligation</p> <p><b>d)</b> With your consent.</p>
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	<p><b>a)</b> Identity</p> <p><b>b)</b> Contact</p> <p><b>c)</b> Profile</p> <p><b>d)</b> Usage</p> <p><b>e)</b> Marketing and Communications</p> <p><b>f)</b> Technical</p>	<p><b>a)</b> Necessary for our legitimate interests to study how customers use our products/services, to develop them,</p> <p><b>b)</b> to grow our business and</p> <p><b>c)</b> to inform our marketing strategy and with your consent</p>
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<p><b>a)</b> Technical</p> <p><b>a)</b> Usage</p>	<p><b>a)</b> Necessary for our legitimate interests to define types of customers for our products and services,</p> <p><b>b)</b> to keep our site updated and relevant,</p> <p><b>c)</b> to develop our business</p> <p><b>d)</b> to inform our marketing strategy</p>

Purpose/Activity	Type of data	Lawful basis for processing
To make suggestions and recommendations to you about goods or services that may be of interest to you	<b>a)</b> Identity <b>b)</b> Contact <b>c)</b> Technical <b>d)</b> Usage <b>e)</b> Profile	<b>a)</b> Necessary for our legitimate interests to develop our products/services and grow our business and <b>b)</b> with your consent

As an employee / candidate / recruit / contractor etc. We may collect and process information about you, including your name, date of birth, address, contact details (including email address and mobile phone number), employment details, and other data collected as part of any application for employment. We may take personal information from:

- Information that you provide to us when registering with our website (including your email address)
- Information that you provide when completing your application (including your name, gender, date of birth and any educational details and employment details you provide)
- Information that you provide to us when signing up to any lists to receive correspondence from
- Information we collect from other sources such as the internet, social media, commercial databases, other companies, and other third parties
- Information we derive from information we collect about you – for example where we derive your email address from your name and company name combined
- Information relating to any vacancies, jobs, or employment you accept

Personal data we receive will be used for the purposes it was provided, including:

- To respond to queries from you regarding vacancies and employment
- To manage and administer the relationships between you and us
- To notify you about changes to our services and to otherwise communicate with you; for example, we will use your contact details in order to respond to any queries that you submit to us
- To obtain feedback from you regarding us
- Tell you about any place of work changes e.g. Shift patterns, new assignments or any other changes regarding your job role.

- Managing data protection requests from clients, candidates, and other third parties

In accordance with your preferences, we may also use your personal information to provide you with information about products, services, promotions and offers that may be of interest to you. We may use your personal information in order to ascertain the services, opportunities, promotions and offers that are likely to be of particular interest to you. This document explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services communications, including communications in relation to any purchases you make or services you use.

## Data subject rights under the GDPR

Under the GDPR you as an individual have rights when it comes to how we handle your personal data. These include:

- **The right to be informed:** you have the right to be provided with clear, transparent and easily understandable information about how we use your personal data. This is why we're providing you with the information in this privacy policy;
- **The right to access:** you have the right to receive a copy of your personal data that we store and process, and other supplementary information. In most cases we cannot charge a fee to comply with your access request. However, we can charge a "reasonable fee" for the administrative costs of complying with the request if the request is manifestly unfounded, repetitive or excessive; or if you request further copies of your personal data following a request. Alternatively, we can refuse to comply with a manifestly unfounded or excessive request;
- **The right to rectification:** you are entitled to have your information corrected if it's inaccurate or incomplete;
- **The right to erasure:** this is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not an absolute right and only applies in certain circumstances. Please note that after receiving your request to delete your personal data, we may retain a minimum amount of your personal data where we believe that such information may be relevant to any ongoing or potential legal proceedings and in order to establish, exercise or defend our legal rights or to protect our company's interests. We may also retain a minimum amount of data in order to respond to future data protection requests. Our lawful basis for partial deletion of your data is legitimate interest, in that it is in our legitimate interest to protect our business, defend ourselves from legal claims and comply with our legal obligations. It is also in our legitimate interest to be able to respond to data protection requests. These data will be archived and only authorised personnel will have access to it;
- **The right to restrict processing:** you have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further;
- **The right to data portability:** you have the right to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability



- **The right to object to processing:** you have the right to object to certain types of processing, including processing for direct marketing (i.e. If you no longer want to be contacted with potential opportunities);

## **How to change your preferences**

We operate in line with GDPR data protection guidelines. We respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities, namely the information commissioner's office. Any requests or objections should be made in writing to the data controller, or you can visit our website, call, or email us to contact us to change your preferences at any time. If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

## **Scope of agreement**

By submitting your personal data on this site or as required for us to provide products and services to you, you are affirming your agreement for such information to be used in accordance with this privacy policy. You will be able to change your preferences at any time by the methods described as prescribed in this document. We may from time to time use your information for marketing, account management or relationship management purposes. The main purpose of this is to provide you with information about services which we think may be of interest to you and/or to maintain any existing relationship we may have with you.

## **How we store and process your data**

Your data will be collected, stored and processed securely in the UK, where we transfer your data outside the UK, we ensure that appropriate technical and organisational safeguards are in place to protect your data. Your data will be stored for a period of time after our last interaction. In order to provide our services we may use carefully selected third parties. These third parties may operate outside the UK, if this is the case we will ensure precautions are in place to protect your data. We may also use recognised third parties to take payment, conduct credit reports and other checks, manage our company accounts and provide banking services. We will store transactions, payment and order data for up to 7 years or for as long as required by UK financial and company regulations. These third parties may operate outside the UK, if this is the case we will ensure precautions are in place to protect your data. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose and/or we are acting as you would reasonably expect. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing. We may be legally obliged to disclose your personal information without your knowledge.

## **Our obligations**

We are a data controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the GDPR in the way we use and share your personal data. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests.

## **Third parties**

We may have to share your personal data with the parties set out below for the purposes described in this document: for candidates/workers – prospective employers and companies that may offer you work and other relevant third parties for clients – candidates / employees / workers that may be interested in any vacancies and other relevant third parties

For all users of our site:

- Companies where you have applied for a vacancy
- other companies we believe you would be interested in working for
- companies that may have vacancies that match your preferences
- service providers who provide it and system administration services.
- Other companies as required for us to provide our services to you and/or our clients
- professional advisers including lawyers, gdpr consultants, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance and accounting services etc..
- Third parties who use such data for non-marketing purposes (including credit and risk assessment and management, identification and fraud prevention, debt collection and returning assets to you).
- HM revenue & customs, regulators and other authorities based in the united kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties as required to provide our services to you and our clients
- social media platforms
- other IT platforms and services as required to provide our services to you and to operate our company

- other companies where we have a lawful basis and where we believe the purpose is consistent with the original purpose and always as you would reasonably expect

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## **Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We will report any breaches or potential breaches to the appropriate authorities within 72 hours and to anyone affected by a breach within 72 hours. If you have any queries or concerns about your data usage, please contact us. This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **Cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website. As well as your ability to accept or reject cookies, we also require your permission to store cookies on your machine, which is why when you visit our site, you are presented with the ability to accept our terms of use, including the storage of cookies on your machine. Should you not accept, then you are free to leave our website, at any time.

## **Legitimate interests**

Contacting us, exercising your information rights and complaints - If you have any questions or comments about this privacy policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact [contact@thamestalent.co.uk](mailto:contact@thamestalent.co.uk) we will process your requests within 30 days. We fully comply with data protection legislation and will assist

in any investigation or request made by the appropriate authorities. If you remain dissatisfied, then you have the right to apply directly to the information commissioner for a decision. The information commissioner can be contacted at:

Information commissioner's office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF <https://ico.org.uk/>