

<b>Company Name:</b>	KAP Recruitment Ltd ('the Company')
<b>Company contact details:</b>	Krish Adams 23 High St Emsworth PO107AQ 01243978180
<b>Privacy Policy</b>	Privacy Notice (including for use on the company website)
<b>Topic:</b>	Data protection
<b>Date:</b>	04/03/2024
<b>Version:</b>	1.0

The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including special categories of 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 this privacy statement. We will comply with current data protection laws at all times.

## Contents

1. Collection and use of personal data
  - a. Purpose of processing and legal basis
  - b. Legitimate interest
  - c. Statutory/contractual requirement
  - d. Recipients of data
2. Information to be provided when data is not collected directly from the data subject
  - a. Categories of data
  - b. Sources of data
3. Data retention
4. Your rights
5. Cookies
6. Login files
7. Links to external sites
8. Sale of the business
9. Data security
10. Changes to this privacy statement
11. Complaints or queries

## 1. Collection and use of personal data

### a. Purpose of processing and legal basis

The Company will collect your personal data (which may include special categories of 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.

If you have opted-in we may also send you marketing information and news via email/text. You can opt-out from receiving these at any time by clicking “unsubscribe” when you receive these communications from us.

On some occasions 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.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding 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. 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 is/are as follows:

- Managing our database and keeping work-seeker records up to date;
- Providing work-finding services to you and our clients;
- Contacting you to seek your consent where we need it;
- Giving you information about similar products or services to those that you will have used from us recently.

### c. Statutory/contractual requirement

The Company has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements). Our clients may require this personal data, and we may need your data to enter into a contract with you. If you do not give us the personal data we need to collect in order to comply with our statutory and legal requirements, we may not be able to continue to provide work-finding services to you. Failure to provide this information will result in The Company not being able to enter an employment contract on your behalf.

### d. Recipient/s of data

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

- Clients (who we may introduce or supply you to)
- Your former employers who we may seek references from
- Payroll service providers who manage payroll on our behalf or other payment intermediaries who we may introduce you to
- Other recruitment agencies in the supply chain
- Auditors who are assessing the compliance and processes of the business to ensure its adherence to all relevant legislation and good practice guidance.
- The Company insurers.
- The Company legal advisers.
- Social networks.
- The Company IT and CRM providers

## 2. Information to be provided when data collected not from the data subject

**Categories of data:** The Company has collected the following personal data on you:

### *Personal data*

- Name, address, mobile no., email,
- National insurance no.
- Nationality (through right to work check)
- Passport or Biometric Residence Permit

### *Special categories of personal data:*

- Health information including whether you have a disability.
- Criminal conviction(s)
- Financial Details
- Education and Employment Details
- Personal Characteristics

**Source of the personal data:** The Company sourced your personal data/special categories of personal data:

- From CV Library, TotalJobs, Indeed, LinkedIn, Facebook
- A referee whose details you previously provided to us
- Umbrella Companies and other software/financial companies we work with.
- Cookies listed in section 7
- Previous relationships with employees of The Company

This information does not always come from a publicly accessible source.

## 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. For example, 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 are required to keep your records relating to the right to work in the UK 2 years after employment or the engagement has ended alterable and working time records including your 48 hour opt out notice annual leave/holiday records 2 years from the time they were created.

Additionally, 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. This is currently 3 to 6 years.

Where the Company has obtained your consent to process your personal and special categories of personal data, we will do so in line with our retention policy (a copy of which can be provided on instruction). 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 data and sensitive personal 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 data and sensitive personal data you have the right to withdraw that consent at any time by contacting Krish Adams, 23 High Street, Emsworth, PO107AQ, 01243978180. Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where the Company will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for 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. Cookies

Our website uses cookies to improve and personalize your experience and to display advertisements (if any).

Our website may also include cookies from third parties like Google AdSense, Google Analytics, and YouTube. By using the website, you consent to the use of cookies. Further details can be found in our Privacy Policy.

If you leave a comment on our site you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

If you visit our login page, we will set a temporary cookie to determine if your browser accepts

cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

## 6. Login Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

## 7. Links to external websites

The Company's website may contain links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Company's website.

## 8. Sale of business

If the Company's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business. Where the sale of the business results in the transfer of your details to a different data controller we will notify you of this.

## 9. Data Security

The Company takes every precaution to protect users' information. Our employees use firewalls (Norton Anti-Virus) to protect our PCs.

Only employees who need the information to perform a specific job (for example, consultants, our accounts clerk or a marketing assistant) are granted access to your information.

The Company uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/ the Internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/the Internet.

If you share a device with others, we recommend that you do not select the "remember my details" function when that option is offered.

**If you have any questions about the security at our website, you can email Krish Adams - [Krish@kaprecruitment.com](mailto:Krish@kaprecruitment.com)**

## 10. Changes to this privacy statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.

## 11. Complaints or queries [NOTE Error! Reference source not found.]

If you wish to complain about this privacy notice or any of the procedures set out in it please contact:  
Krish Adams, 23 High Street, Emsworth, PO107AQ, 01243978180

You also have the right to raise concerns with the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/make-a-complaint/>, or any other relevant authority should your personal data be processed outside of the UK and you believe that your data protection rights have not been adhered to.