

Company Name:	Broadreach Recruitment Ltd ('the Company')
Company Contact details:	Lianne Gray, Broadreach Recruitment Limited, Verulam House, Cropmead, Crewkerne, Somerset, TA18 7HQ, t: 01460 455002 e: info@broadreachrecruitment.com
Document DP5A	Privacy Notice (when personal data is obtained from the data subject)
Topic:	Data protection
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The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

This data protection statement sets out how we'll use your personal data. 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 job 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 statements.

1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company has collected your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services.

For example, we have an interest in making sure the jobs we match you to are suitable for you, so we may process your information to send you jobs which match your skills, experience & preferred location or salary.

When we process your personal information for our legitimate interests, we make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests - we will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

The table in section b. sets out further detail on the ways we process your data for our legitimate interests. If you have any concerns about the processing below, you have the right to object to processing that is based on our legitimate interests. For more information on your rights, please see “Your Rights” section below.

The legal bases we rely upon to offer these services to you are:

We'll process your personal data:

- 1) as necessary **for our legitimate interests** or those of other organisations, e.g.:
 - a) to receive & store your CV and work preferences in order to search for suitable positions on your behalf
 - b) to contact you to discuss your requirements
 - c) to match you to potential positions that suit your skill set
 - d) to understand if there are health/disability considerations in order to match you to suitable vacancies
 - e) to contact you regarding potential job opportunities which suit your skills
 - f) to send your CV to 3rd party Client companies who have a suitable vacancy
 - g) to contact you re interviews
 - h) to contact you re signing an employment contract if you are successfully placed in a position with a 3rd party Client company
 - i) to contact you re registration paperwork and right to work evidence
 - j) to receive, store and share said registration paperwork and right to work evidence where required with the 3rd party Client company or another 3rd party as required by law
 - k) to keep your Next of Kin details for the time that you are working for / contracted through Broadreach Recruitment

- 2) as necessary **to comply with a legal obligation**, e.g.:
 - a) as a recruiter, we have a legal obligation to retain records for at least one year after their creation and for at least one year after the date on which we last provided work-finding services (whether successful or not)
 - b) to retain payroll records for at least 7 years
 - c) for activities relating to the prevention, detection and investigation of crime

- 3) as necessary **to perform our contract with you** for the relevant job placement (if successful placed):
 - a) to manage & perform that contract
 - b) to update our records;
 - c) to ensure we can pay you
 - d) and to trace your whereabouts to contact you about your contract and recovering any debt

- 4) based on **your consent**, e.g.:
 - a) to send you marketing communications where we've asked for your consent to do so

Where Consent has been given as per 4) above, you are free at any time to change your mind and withdraw your consent. The consequence will be that you won't receive marketing information.

b. Categories of data

The Company may have collected some or all of the following personal data on you:

Personal data:

What	Comments
Personal data:	
Full name and personal details including contact information	e.g. home and/or business address, email address, home, business and/or mobile telephone numbers
Date of birth / age	<i>if given on your CV</i>
Education and employment details	<i>if given on your CV</i> , or required under Employment Agencies Act 1973 where qualifications are mandatory in certain circumstances to proceed with an application
Financial details	e.g. salary levels, <i>if given on your CV</i>
Hobbies	<i>if given on your CV</i>
Social Media profile URLs	<i>if given on your CV</i>
Banking details	if your application proceeds successfully to a placement
Copy of Passport or other ID proving Right to Work	prior to submitting you for a role that you are interested in
Next of Kin information	if your application proceeds successfully to a placement. This is collected as a duty of care (health and safety) in case of accident & emergency
Referee information	<i>if given on your CV</i>
Sensitive personal data:	
Disability/ health information	where relevant to the job search or position in question, <i>or given on your CV</i>
Criminal conviction or offence data:	
Criminal conviction or offence information	if successfully shortlisted, <i>or given on your CV</i>

Sensitive personal data:

Health/disability data

This is gathered under legitimate interest to ensure that you can be matched to job opportunities suitable for you AND under the condition where processing is necessary for carrying out our rights under UK employment law.

Criminal record data

This is gathered where appropriate under the condition that processing is necessary for fulfilling obligations under UK employment law, namely the Rehabilitation of Offenders Act 1974. Certain categories of convictions (even if spent) prohibit employment in certain fields or job roles.

Monitoring of communications:

Subject to applicable laws, the Company may monitor and record calls, emails, text messages, social media messages and other communications in relation to your dealings with us. We'll do this for regulatory compliance, self-regulatory practices, for quality control and staff training, and when we need to see a record of what's been said.

c. Legitimate interest

Where the Company has relied on a legitimate interest to process your personal data our legitimate interests are as follows:

- to contact Candidates about their requirements
- to contact Candidates about potential work opportunities
to send CV to 3rd party Clients in relation to specific job opportunity or expressed area of interest
- to arrange interviews for shortlisted Candidates
- to contact Candidates or Clients re a successful placement
- to hold Next of Kin details for the length of time you are employed through or contracted via Broadreach Recruitment in case of emergency
- to pay placed Candidates (via 3rd party)
- surveys for purposes of service improvement

d. Recipient/s of data

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

- Employers or Potential employers
- Our 3rd party payroll service
- Umbrella Companies (if you use one to process our payroll)
- IT companies (e.g. those hosting the secure database or where access is required to troubleshoot an IT problem)
- 3rd party cloud-based solutions for gathering data / information transfer (eg surveymonkey, google Drive/Forms etc)

- Our Website collects and shares information with third parties such as Broadbean
- Subcontractors and other persons who help us provide our services
- Our legal and other professional advisors, including our auditors;
- Government bodies and agencies in the UK and overseas (e.g. HMRC who may in turn share it with relevant overseas tax authorities; or regulators e.g. the Information Commissioner's Office or Employment Agency Standards (EAS) Inspectorate)
- Courts, to comply with legal requirements, and for the administration of justice;
- In an emergency or to otherwise protect your vital interests;
- Anyone else where we have your consent or as required by law.

2. Overseas Transfers

The Company may transfer only the information you provide to us to countries outside the European Economic Area ("EEA") for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

We rely on 3rd party cloud technology providers for information technology & transfer (e.g. google, Apple etc), therefore your data may be transmitted temporarily through these. You can opt to provide us with this information via other means.

3. 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.

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 (usually 6 years).

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 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 (*see caveat below).

*Where you have consented to the Company processing your personal data for marketing purposes you have the right to withdraw that consent at any time by contacting Lianne Gray, Broadreach Recruitment Limited, Verulam House, Cropmead, Crewkerne, Somerset, TA18 7HQ, t: 01460 455002 e: info@broadreachrecruitment.com

5. Automated decision-making

Broadreach Recruitment does not use automated decision making.

6. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Lianne Gray, Broadreach Recruitment Limited, Verulam House, Cropmead, Crewkerne, Somerset, TA18 7HQ, t: 01460 455002 e: info@broadreachrecruitment.com

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