



Company Name: **Project Partners Telecoms ('the Company')**

Company Contact details:

Telephone – 0330 2231734

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.

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. At all times we will comply with current data protection laws.

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#### 1. Collection and use of personal data

##### a. Purpose of processing and legal basis

The Company will collect 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. 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. You can opt-out from receiving these at any time by clicking “unsubscribe” when you receive these communications from us.

In some cases, 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 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 that you have used from us recently.
- Providing work-finding services to the individual, including sending information to our clients where the individual has demonstrated an interest in doing that particular work but not expressly consented to us passing on their CV
- Passing work-seeker's information to debt collection agencies
- Disclosing information regarding possible criminal acts or security treats to the authorities

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 also require this personal data, and/or we may need your data to enter into a contract with you. If you do not give us personal data, we need to collect we may not be able to continue to provide work-finding services to you.

d. Recipient/s of data

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

- Clients (whom we may introduce or supply you to)
- Former employers or prospective new employers that we may obtain or provide references to
- The Recruitment and Employment Confederation
- Any clients/other third parties who carry out audits to ensure that we run our business correctly
- Other recruitment agencies in the supply chain (e.g. master/neutral vendors and second tier suppliers)
- Our insurers and legal advisors
- Our IT company Data Productions and our CRM provider Voyager Software
- Any public information sources and third party organisations that we use to carry out suitability checks on work-seekers e.g. Companies House, DVLA and credit reference agencies
- Government, law enforcement agencies and other regulators e.g. the Police, Home Office, HMRC Employment Agencies Standards Inspectorate (EASI), Local Authority Designated Officers (LADOs) and GLAA

2. 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 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 sensitive personal data, we will do so in line with our retention statement (see end of notice). 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.

3. 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 Project Partners (Telecoms). For any data protection issues please speak to the data protection officer. 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.

#### 4. Cookies

Our website use Cookies, small files that are placed on your computer or stored in your browser's cache (memory). These are set when you visit our website if you consent to them being set.

We use Cookies for a range of applications, from storing your preference to modifying our websites content.

Key usage is as follows:

- Improving our website and ensuring it displays correctly on your device
- Managing our website
- Keeping our website safe and secure
- Collecting analytical data about how you use our website
- Storing your consent to cookies (even if you decline Cookies, we still have to set a small cookie to remember your preference)
- To help us identify trusted web traffic.
- Remembers the user's selected language version of a website

#### 5. 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.

#### 6. 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.

#### 7. 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.

#### 8. Data Security

The Company takes every precaution to protect our users' information. All our data is stored on our Server and protected by a Firewall which is locked down. Our system is also password protected with added characters for extra security. The data is also backed up off site securely with the application on the Server being encrypted. Our computers when not being used will automatically log off after a short timescale. If anyone leaves the



company passwords will be changed for security reasons.

The IT company we use is: Data Production [www.dataprotections.co.uk](http://www.dataprotections.co.uk)

Only employees who need the information to perform a specific job (for example, consultants, administrators, our accounts department, or our marketing consultant) 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.

All traffic (transferral of files) between this website and your browser is encrypted and delivered over HTTPS.

If you have any questions about the security at our website, you can email [admin@projectpartners.uk.com](mailto:admin@projectpartners.uk.com)

#### 9. 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.

#### 10. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact:

**Project Partners (Telecoms) Ltd**

**Telephone: 0330 2231734**

**Email- [admin@projectpartners.uk.com](mailto:admin@projectpartners.uk.com)**

You also have the right to raise concerns with Information Commissioner's Office 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.

#### **Retention Statement**

- Work-Seeker Records - 2yrs from the last date of providing work-finding services
- Hirer Records - 2yrs from the last date of providing work-finding services
- Terms of engagement with temporary workers and terms of business with clients - 6yrs
- Working time records - 2yrs from creation
- References - 1yr
- Records held relating to right to work in the UK - 2yrs after employment/engagement has ended
- National Minimum Wage Documents - 6yrs
- All financial records - 6yrs