

WHE Privacy Notice

White Horse Employment is a recruitment business which provides work-finding services to its clients and work-seekers. White Horse Employment must process personal data (including sensitive personal data) so that it can provide these services – in doing so, White Horse Employment acts as a data controller.

You may give your personal details to White Horse Employment 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. White Horse Employment 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 statement.

1. Collection and use of personal data

a. Purpose of processing and legal basis

White Horse Employment 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/ text. You can opt-out from receiving these at any time by clicking or replying “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 the course of internal audits to demonstrate our compliance with certain industry standards.

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. Categories and sources of data

White Horse Employment may have collected personal data directly from you; or through another source such as job boards or professional social networks. As such when data has not been collected directly from you, the data subject; White Horse Employment has collected the following personal data on you:

Personal data:

- Name, address, mobile/home telephone number, email
- National insurance number
- Date of Birth (for payroll processing purposes where required)
- Bank details, HMRC RTI details (for payroll processing purposes where required)

© 2018 White Horse Employment Network Ltd, all rights reserved, commercial copying and lending prohibited.

- Next of kin name and contact number (for H&S purposes)
- Nationality - Passport/National ID Card OR Full Birth Certificate (through right to work check)
- Driving Licence, Utility Bill, Bank Statement (through proof of ID check where required)
- Membership of professional bodies (where required)
- Experience, training and qualifications
- CV

Sensitive personal data:

- Health information including whether you have a disability – for the purposes of reasonable adjustments required to access services or positions sought
- Criminal convictions (where required)
- Security checks (where required)
- DBS certificates (where required)

Source of the personal data: Where personal data was not collected directly from you, the data subject, White Horse Employment sourced your personal data/sensitive personal data from:

- Jobs boards (such as Reed, Totaljobs, CV Library, Monster, Indeed), LinkedIn, Facebook, Twitter
- A former employer
- A referee whose details you previously provided to us
- Software providers who we use to support our services including website hosts and management company

This information did not come from a publicly accessible source.

c. Legitimate interest

This is where White Horse Employment 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 White Horse Employment 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;

d. Recipient/s of data

White Horse Employment will process your personal data and/or sensitive personal data with the following recipients:

- Clients that we introduce or supply individuals to;
- Former or prospective new employers that you obtain or provide references to;
- The Recruitment and Employment Confederation (and any other trade body that White Horse Employment are a member of who may have access to personal data);
- Any other third parties who carry out audits to ensure White Horse Employment run our business correctly or in line with our contractual and legal obligations;
- Payroll service providers who manage payroll on our behalf or other payment intermediaries whom we may introduce you to;
- BACS payment processing providers who manage payments into Agency Worker bank accounts;
- Other recruitment agencies in the supply chain (e.g. master/neutral vendors and second tier suppliers);

© 2018 White Horse Employment Network Ltd, all rights reserved, commercial copying and lending prohibited.

- Our insurers;
- Our legal advisers;
- Social networks;
- Our IT and CRM providers;
- Any public information sources and third party organisations that we may use to carry out suitability checks on work-seekers e.g. Companies House, the Disclosure and Barring Service (DBS), National College for Teaching and Leadership (NCTL), Nursing and Midwifery Council (NMC), General Medical Council (GMC), DVLA, credit reference agencies
- Skills Testing service providers;
- Government, law enforcement agencies and other regulators e.g. the Police, Home Office, HMRC, Employment Agencies Standards Inspectorate (EASI), Local Authority Designated Officers (LADOs), GLAA,
- Trade unions;
- Any of our group companies; and
- Any other organisations an individual asks us to share their data with.

2. Statutory/contractual requirement

Your personal data is required by law and/or a contractual requirement (e.g. our client may require this personal data), and/or a requirement necessary to enter into a contract. You are obliged to provide the personal data and if you do not the consequences of failure to provide the data are that we may not be able to continue to provide work-finding services to you.

3. Overseas Transfers

White Horse Employment will not transfer the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

4. Data retention

White Horse Employment 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 White Horse Employment has obtained your consent to process your personal and sensitive personal data, we will do so in line with our retention policy. Upon expiry of that period White Horse Employment will seek further consent from you. Where consent is not granted White Horse Employment will cease to process your personal data and sensitive personal data.

5. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data White Horse Employment processes on you;
- The right of access to the personal data White Horse Employment processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;

© 2018 White Horse Employment Network Ltd, all rights reserved, commercial copying and lending prohibited.

- 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 White Horse Employment processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by contacting the Data Protection Officer (dataprotection@wh-employment.co.uk or 01225 777157).

There may be circumstances where White Horse Employment 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 White Horse Employment 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.

6. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact the Data Protection Officer (dataprotection@wh-employment.co.uk or 01225 777157)

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.