



GDPR Privacy Notice (Employment Agency Only)

How we use your personal information

Your personal information will be held by F.J.Wilson Limited.

Our privacy notice explains what information we may obtain from you or about you, how we will use your information, and how we will look after your information.

Our commitment

We will:

- Only ask for and keep personal information about you which we feel is necessary to deliver the best recruitment service we can; which is in your interests, our business interests, and the business interests of potential future employers.
- Only use your personal information in connection with the provision of our recruitment services both now and in the future.
- Only share your personal information with those persons we have confirmed to you. We will never sell your information to any person.
- Only store or transfer your personal information outside of Europe where it is necessary for us to do so and only where we have adequate safeguards in place or we have obtained your explicit consent to handle your information in this way.
- Only retain your personal information for as long as we consider it necessary in order that we can continue to provide the best recruitment service to you now and in the future.
- Ensure that your personal information is held securely.

Your personal information and the law

Who we are

About Us

We are F.J.Wilson Limited), a registered company in England under company number 7083525 with our registered offices at 3 King's Court, Willie Snaith Road, Newmarket, Suffolk, CB8 7SG.



We are an employment agency for the purposes of the Conduct of Employment Agency and Employment Businesses Regulations (2003) (**Conduct Regulations**).

Our services

We are a niche employment agency and we specialise in working with professional membership organisations, awarding bodies and learning providers. We provide a tailored recruitment service to our client organisations who are seeking to find talent to fill their permanent vacancies and fixed term vacancies.

Our role and aims

In delivering our recruitment services, we assist and support:

- Client organisations in finding suitable talent for their skills needs now and, in the future.
- Candidates in identifying and exploring new and relevant employment opportunities for them now and in the future
- The wider social aims of reducing skills shortages, ensuring more people find work, and reducing and maintaining low unemployment in the UK.

How to contact us

If you have any queries or questions about this privacy notice, please contact our data protection manager, at dataprotection@fjwilson.com or you may call us on 0203 195 3600.

Should you wish to contact us more formally to exercise any of your rights in law or to request information about our use of your personal information please refer to Your Rights and How to Complain and Contact Us-Your Rights below.

Your personal information

Personal data including special categories of data and criminal convictions and offences data (sensitive information)

Any information we hold about you which identifies you as an individual (**personal data** under the General Data Protection Regulations (GDPR) which comes into force from 25th May 2018) may only be used by us in accordance with the requirements of the GDPR.

Any personal data that we hold manually or electronically in a relevant filing system is within scope of GDPR. If we use particularly sensitive personal data about you (**special categories of data** under GDPR) or we use personal data relating to criminal convictions



and offences, we must comply with additional rules under the Data Protection Act 2018.

Special categories of data under GDPR are data which reveal an individual's:

- Racial or ethnic origin
- Religion or political views
- Data relating to their health
- Genetic and biometric data
- Membership to a trade union
- sex life or sexual orientation

When we refer to your “personal information” in this privacy notice, we refer to personal data as defined in GDPR and which include the sensitive information defined above and which is also protected under data protection laws.

Whose Personal Information do we collect and use

We collect, use, and store personal information in respect the following types of individuals:

- **Candidates** (i.e. job applicants/work-seekers)

Individuals who approach us seeking a new role or to discuss a role that they have become aware of, who respond to an advertisement we publish in respect of a role, or who we approach as someone who may be interested in a role we are currently seeking to fulfil for a client organisation or who may be interested in future roles we may have

- **Client Contacts**

Employees within the HR function, hiring managers, and other employees within our client organisations that we have dealings with when providing our recruitment service

- **Referees**

Work and or personal referees whom our candidates may provide to us either within their CV or directly in the course of the delivery of our services

- **Referred Contacts**

Friends, colleagues, and other contacts whom a Candidate, Client or other third party with whom we have had dealings with in the provision of our recruitment service may refer to us or recommend we contact with respect to a role or the delivery of our recruitment services



- **Supplier Contacts**

Employees and other authorised individuals within organisations whom have dealings with us as a consequence of their organisation delivering business and/or support services to us as a supplier to maintain and/or operate our recruitment services

We are committed to protecting and respecting the privacy of those individuals to whom we deliver our services to and those individuals whom our business or our services may affect.

Personal Information we may collect

- **Candidates**

We may collect and process a range of personal information about you, whether obtained directly from you or obtained from a third-party source, and which includes but is not limited to contact details, work and employment history, education, professional qualifications and your personal interests. Our full list of personal information we may collect from a Candidate can be found in the following table.

Type of Personal Information	Details	Source	Reason for collection
Contact	Name, address, email address, telephone number, mobile number	From Candidate	From a third party Job Boards Networking Sites To identify suitable roles for you; to assess your suitability for specific roles we may have available; to assess you against criteria for roles confirmed by our clients; to ensure that we seek to match you to roles in line with your aims and aspirations; to ensure we represent you in the best possible way to our clients; both now and in the future.
Employment	Previous roles worked in Details of prior roles Employers details Dates of employment Current remuneration, contractual benefits, non-contractual benefits Remuneration and benefit expectations for future roles Career aspirations	CV Application Form Interview Communications with candidate	Job Boards Networking Sites Referees* Prior employers - employment history verification check
Education/Training	Information on schools/colleges/university attended and types of exams taken and grades Other training courses undertaken and grades		Job Boards Networking Sites Referees Educational

		Institute Job Boards	To undertake further
Professional Qualifications	details of professional qualification held	Networking Sites Professional Institute Job Boards	verification of employment history, gaps in employment, and or which may include taking up references but only where it is required by our client
Social Activity/Interests	outside interests, hobbies, likes, dislikes, family interests	Networking Sites Job Boards Networking Sites	
Professional Body registrations and accreditations	details of any professional memberships or memberships of professional bodies	Referees	
Personal Qualities/Skills/Behaviour Characteristics	information about your personal attributes, your personal skills, ability to lead, ability to work in a team, and other information from answers provided to competency-based questions, psychometric test questions, personality test questions and skills testing	Professional Body Psychometric testing and assessment service providers External skills testing service providers	To keep you informed generally about roles which we believe may of interest and are relevant to you both now and in the future.
Health Information	Any health conditions, sickness information, medical conditions, and including any information on disabilities	Referees Referees Prior employers - employment history verification check	To ensure that we comply with obligations under the Equality Act 2010; to explain gaps in your employment

				history where our client has requested we verify employment history as part of our recruitment process
Criminal Convictions/Offences check	Unspent criminal convictions		Basic Disclosure Check - DBS	We only collect such information is requested by a client for a particular role
Confirmation of Identity check	Evidence of ID confirmed by production of copies of documents, usually 2 from list; Passport or photo driving licence Proof of address; utility bill, bank/building society statement, council tax bill		ID check report	To ensure that we have confirmed who you are; where requested by a client for a particular role
Right to work check	your confirmation of whether you have a right to work and basis of such right; evidence of ability to work legally in the UK; copy of passport or 2 documents from Home Office list of documents	Communications with candidate	from Background Screening Service Provider	To ensure that we understand whether you have a legal right to work in the UK or may require a visa, but only where requested by a client for a particular role

Recruitment process feedback	feedback taken post interview, post offer, and/or post rejection from each of the Candidate and Client	Communications with candidate	Client interviewer	To ensure we deliver constructive feedback to both our Candidates and Clients during the recruitment process and exchange feedback where required by our Client
Remuneration	salary and or income details offered, contractual benefits, and other remuneration offered to candidate	Communications with candidate	Client who has offered candidate	To allow us to invoice our placement fee if you accept an offer having been introduced for the role concerned
<p>*Referees/prior employers - we will always discuss any requirement for us to take up any verbal and or written references and/or any requirement for us to verify your employment history and or gaps in employment history for any role. We will never seek to contact a current employer unless with your consent.</p>				

- **Client Contacts and Supplier Contacts**

We may collect and process personal information relating to Contact details for our Client Contacts and Supplier Contacts.

We will only collect such personal information either directly from you as a Client Contact or Supplier Contact as a consequence of our communications with you, indirectly during negotiations with a Client or Supplier, indirectly from the contract with our Client or our Supplier, or indirectly from a Job Board or via a Networking Site. We may use such personal information to contact you to discuss our recruitment services with you now and in the future, to deliver our recruitment services to you, to perform our obligations under a contract with the Client, and to keep in touch with you regarding future vacancies that you may have for which you wish to find suitable Candidates for.

- **Referees**

We may collect and process personal information relating to Contact details for Referees who are provided to us by a Candidate.

We will only collect such information directly from a Candidate or from a Job Board which the Candidate has published their details on or profile of the Candidate from a Networking Site. Referee details will be shared with our Clients in the delivery of our recruitment services when a Candidate is introduced for roles with our Clients. Clients may therefore contact you to seek a reference on a Candidate when they are considering offering a role or upon the offer of a role to a Candidate. We will only use your Contact details for the purpose of taking up a reference for a Candidate, where we are required to do so by a client for a role that a Candidate has been introduced for.

- **Referred Candidates**

We may collect and process personal information relating to Contact details for Referred Candidates who are provided to us by a Candidate, Client or other third party.

We will receive personal information about you directly from the individual who referred you or from a Job Board or profile for a Networking Site that you may be subscribed to. We will only use such personal information to contact you as a direct consequence of you being referred to us. We will typically ask the person referring you to confirm that you are willing to be contacted by us or in the alternative we will ask the person referring you to introduce you to us. If you express an interest in discussing a role with us now or in the future as a consequence of our contact with you as a Referred Candidate, we will register you and you will be considered a Candidate for the purposes of this privacy notice. If you are not interested in discussing a role with us and confirm that you do not wish to receive further communications from us as a consequence of you being referred to us by a Candidate, we will not retain your personal information.

Sources of Personal Information

In respect of our communications with you, we may obtain personal information from you arising from:

- Your use of our website
- applications you make to roles we advertise for (via our website or via a job board)
- Your attendance at any networking event we host or sponsor
- Your attendance at any recruitment fair where we are promoting our recruitment services
- When you talk to us over the phone, via email, or through any text or email messaging service

We may obtain personal information about you from third party sources:

- Job boards
- Networking Sites (any professional and or social networking site where you have uploaded or published personal information to)
- Referrals - a personal or professional recommendation from a third party (typically family member, friend, colleague or former employer)

How Personal Information is protected

GDPR rules on processing personal information

Under data protection law, we are only able to use personal information for specific reasons and always provided we are using personal information fairly and we have advised you of our use. Specifically, we must have one or more of the following lawful reasons to process your personal information;

- We are required to comply with a legal or regulatory requirement (**Legal Obligations**);
- It is in our legitimate interest i.e. we have a business or commercial reason to use your personal information and our use is not unfair to you and does not adversely affect your rights and freedoms (**Legitimate Interest**); or
- You consent to our processing (**Consent**)

For special categories of data or data relating to criminal convictions and or offences (which are considered more sensitive personal information), there are additional requirements that we must fulfil. We will not collect or use more sensitive personal information without your consent unless the law allows us to do so. If we do seek to collect and or use such information, it will only be when it is necessary and for one of the following reasons:

- We obtain your explicit consent to our processing (**Explicit Consent**)
- We are required to comply with or exercise our rights in the field of employment laws (**Employment Law Obligations**);
- It is for reasons of substantial public interest (**SBT**); or
- It is to establish, exercise or defend legal claims (**Legal Claims**)

Reasons for processing personal information

Candidates

We will use your personal information to:

- Register your Contact details and other personal information in our database in order to consider you and discuss with you any relevant permanent and or fixed term vacancies that we are instructed to submit candidates for now and in the future.
- Assess your skills, qualifications, and suitability for a relevant permanent and or fixed term vacancy, and which may include but not be limited to interviewing you.
- Discuss any potential role identified with you and ascertain your willingness to work in the role concerned for Conduct Regulations purposes.
- Introduce you to a Client for a role that we have discussed with you (directly or via an Intermediary).
- Discuss you as a potential suitable candidate with a Client for permanent and or fixed term vacancies. (directly or via an Intermediary)
- Notify you of and carry out any background screening, employment verification, and or reference checks relevant to a role but only where it has been instructed by a Client.
- Communicate with you and the Client (or any Intermediary) about the recruitment process and during each stage of such recruitment process.
- To keep you updated in respect of all applications that you made to us or roles that you have been submitted for by us.
- Keep records related to your introductions and the outcome of those submissions.
- Comply with our legal or regulatory requirements.
- Share your personal information with third parties where required by law or where necessary in pursuit of our legitimate interests - for more information **see the box below**.
- Less commonly, we may use your personal information to help us to establish, exercise or defend legal claims.
- Keep you informed of future relevant permanent and or fixed term vacancies that may arise now and in the future by post, email, telephone and or other electronic means (marketing communication).
- Contact you individually regarding a role which we believe will be of interest to you whether by email, telephone, and or other electronic means (marketing communication).
- Keep you informed of developments in our recruitment services that we believe will be of interest to you by post, email, telephone, and or other electronic means (marketing communication).
- Ask you for your help in finding Candidates for roles that we have e.g. through a refer a friend promotion (marketing communication)
- Keep you informed about relevant professional information; published salary surveys relevant to you, networking events, and other relevant information about the industry sector or your skills sector which we believe may be of interest to you (marketing communication).

Our reasons for processing your personal information

We use your personal information for the above purposes where we deem it relevant and necessary for our legitimate interests.

Legitimate Interest

What do we mean by legitimate interests for processing Candidate personal information?

Our processing of Candidate, Referee and Referred Candidate personal information is necessary for us to ascertain your suitability for potential roles that we have and to ensure we are matching you to the right roles based on our understanding of your career aspirations and goals. We believe it is important that we have a rounded and informed understanding of your work history, technical and personal skills, and your outside interests in order to achieve these aims.

Our sharing of Candidate and Referee personal information with Clients regarding potential employment opportunities as well as introducing you for specific vacancies is necessary to ensure that we have the best chance of finding relevant employment opportunities for you and the best chance of us successfully filling vacancies for Clients.

We may collect and process personal information relating to you that we would not ordinarily undertake of our own volition, **Client Requirements**, and we will advise you of any such requirements for a role when discussing the role with you. This may involve us asking you to confirm your legal right to work status and or to confirm your identity as examples which typically an employer undertakes after an offer of employment has been made. Other requirements may include employment verification and the taking up of references. We will only require the collection and processing of such personal information where we are asked to by the Client. Our collection and processing of such personal information is necessary for us to comply with our contractual obligations to our Client.

We may contact you by sending you marketing communications to you about potential roles, our services, and professional information which we believe are relevant to you and would be of interest to you. Our continued contact with you now and in the future on this basis is beneficial and necessary to ensure that you receive the best range and choice of employment opportunities; that we may assist and support you in your career aspirations at the various stages of your career; that our Clients continue to have access to a broad range of suitable Candidates for roles that they may have now and in the future, that Clients may receive introductions in faster timescales through our access to suitable Candidates, and that we may continue to fulfil roles for Clients to maintain a sustainable and profitable business.

Our Marketing Communications

We have already clarified our grounds for sending you marketing communications under GDPR. Under existing rules on electronic marketing communications, if we wish to email you our marketing communications we are either required to obtain your consent (GDPR standard) to send marketing communications or we may rely upon the rules for soft-opt in consent for existing customers. We rely upon the soft-opt in consent on the basis that we have had Dealings with you, we only send you marketing communications regarding

relevant roles, or otherwise in connection with our recruitment services or similar services, we do not share your data for marketing purposes with any other person and provided you have not opted out of receiving our email marketing communications. You have the right at any time to opt out of receiving future email marketing communications from us or otherwise object to our future marketing communications by emailing us directly. Please see **Contact Us - Your Rights** for more information.

Our reasons for processing sensitive personal Information

- **Candidates**

We do not as part of our own assessment of your suitability for a role seek to collect any special categories of data or data relating to criminal convictions and offences in respect of Candidates for permanent and fixed term roles. However, occasionally, we may collect such personal information in respect of a Client Requirement or through information you disclose to us.

- **Health Information**

Employment Law Obligations - We will only use information that you provide to us about any disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example where adjustments need to be made during a test or interview for a role. If the role you wish to be considered for requires us to ascertain your ability to carry out certain duties which are intrinsic to that role, we may require you to provide health information to help us in that assessment during the recruitment process.

Legal Claims - We may process your personal information to establish, exercise and or defend legal claims.

Consent - We will only process health information for any other reason outside of those specified above if we have your explicit consent.

We will delete any record of such health information we hold on any such information whether you are successful in the role or unsuccessful in obtaining the role in accordance with our **retention policy** except to the extent we are required to comply with the Equality Act 2010 for any future roles and or to defend legal claims.

- **Criminal Convictions and offences**

Consent - We do not process information about unspent criminal convictions and offences about any Candidate or any other individual whom is affected by our services, unless a Client has a specific requirement that we ask about criminal conviction and offences of Candidates as part of our recruitment process for which we have a legitimate interest in asking in order to comply with our contractual obligations with our client. We will advise you of any such requirement when we discuss a role with you prior to introducing you for the role concerned. However, we will always seek your explicit consent to collect and process such information and we will only process such information in order to fulfil our Client's Requirements.

- **Equal Opportunities Monitoring**

Consent - We do not currently process sensitive personal information about race or ethnicity, sex or sexual orientation, or religious beliefs for equal opportunities monitoring purposes. If a Client contractually requires us to undertake such monitoring in respect of all Candidates introduced and processed for vacancies and this cannot be processed on an anonymous basis (which would naturally fall outside of the requirements of GDPR) we will only collect and process such sensitive personal information with your explicit consent. We may in the future introduce equal opportunities monitoring, but any such monitoring shall be undertaken on the basis that any disclosure of such data which will be collected on an anonymous basis and used as anonymised data, falling outside of the requirements of GDPR.

- **Client Contacts**

We may use personal information to contact you to discuss our recruitment services with you now and in the future, to deliver our recruitment services to you, to perform our obligations under a contract with the Client, to keep in touch with you regarding developments in our recruitment services which we believe will be of benefit to you, and to keep in touch with you regarding future vacancies that you may have for which you wish to find suitable Candidates for.

Legitimate Interest - We have a legitimate interest in processing your personal data to ensure that we find suitable Candidates for you for vacancies that you have, to deliver recruitment services to you under contractual terms and conditions, and to ensure that you always receive the most appropriate services from us to deliver your recruitment needs.

Legal Obligations or Legitimate Interest - Less commonly, we may need to process your Contact details in the event we are required to comply with any legal and or statutory obligations, and or for which we may rely upon grounds relating to Legal Obligations.

- **Supplier Contacts**

We may use personal information to administer our rights and obligations under our contract with the Supplier, to ensure the delivery of the Supplier's services to us, and to manage the commercial relationship between the Supplier and us.

Legitimate Interest - all of the above activities reflect processing which is in our legitimate business interests to process based upon the relationship between us and our Supplier.

Legal Obligations or Legitimate Interest - Less commonly, we may need to process your Contact details in the event we are required to comply with any legal and or statutory obligations, and or for which we may rely upon grounds relating to Legal Obligations.

- **Referees**

We will only use your Contact details for the purpose of taking up a reference for a Candidate, where we are required to do so by a client for a role that a Candidate has been introduced for.

Legitimate Interest - It is in our legitimate interest to take up references where we are required to do so at the request of our Client to ensure we comply with the terms of our contract with a Client and to ensure that our Candidate has the best chance of being successful in the recruitment process where references are required to be taken prior to an offer.

Legal Obligations or Legitimate Interest - Less commonly, we may need to process your Contact details in the event we are required to comply any legal and or statutory obligations, and or for which we may rely upon grounds relating to Legal Obligations.

- **Referred Candidates**

We will only use your Contact details for the purpose of contacting you as a consequence of you being referred to us and in connection with our recruitment services.

Legitimate Interest - We have a legitimate interest in ensuring that we identify potential suitable Candidates that are not currently registered with us for roles that we are working on now and in the future so that we can fill vacancies that we have open and we can ensure we register and maintain details of suitable Referred Candidates for future roles to ensure that we can best meet the vacancy requirements of our Clients as they arise and so we can meet the needs of our Referred Candidates locating new employment opportunities and keeping Referred Candidates informed of suitable opportunities in the future. Upon registering with us, Referred Candidates will be considered Candidates for the purpose of this privacy notice.

Legal Obligations or Legitimate Interest - Less commonly, we may need to process your Contact details in the event we are required to comply any legal and or statutory obligations, and or for which we may rely upon grounds relating to Legal Obligations.

Automated decision-making

No decision whether or not to introduce a Candidate who meets the requirements for a vacancy is made without human intervention and no decision is based solely on automated decision-making. You will therefore not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you. Whilst we do not envisage that any decisions will be taken about you using automated means, we will notify you in writing if this position changes.

Security of your personal information

We have put in place measures to protect the security of your information.

Third-party providers will only process your personal information in accordance with our instructions and upon terms under which they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

Candidates - our Clients are data controllers in their own right for the purposes of data protection laws, and therefore are required to comply with the requirements of security under GDPR. Our terms of business require the Client to comply with the requirements of GDPR and they will have their own privacy notice and policy with respect to their own processing of personal information they collect and use. Should you wish to understand what other personal information, if any, they collect about you, and or process outside of our expectations in this privacy notice, or any queries in relation to their processing of your personal information as a data controller you should contact the Client directly.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

How long we keep your personal information?

We will retain your personal information only for as long as is necessary and in accordance with the legitimate interests of our Clients, our Candidates and our own commercial needs to maintain a sustainable and profitable business but subject always to any overriding law which requires us to retain certain information for longer periods.

We believe that it is reasonable and fair that we retain personal information in accordance with the following periods:

- **Candidates** - From the date of collection of your personal information, we expect to have on-going discussions and communications with you during your career with respect to existing and future permanent and fixed term roles however those discussions arise (**Career Discussions**). However, we understand that there may be periods during which we have no Career Discussions with you and after a period of time it may be reasonable to expect that your personal information is no longer of interest or relevance to us and should be deleted. Given the nature of our recruitment services and the skills and sectors that we operate in, if we have not had any Career Discussions with you for more than 2 years since our last Career Discussion, we will remove your personal information from our CRM and systems. We will retain any personal information regarding a role that you have been

introduced for, irrespective of whether or not you have been successful, for at least 12 months in order to comply with any Legal Obligations and or to ensure we can deal with any Legal Claims that may arise during this time as is necessary and in our legitimate interest. Should you request the deletion of your personal information before this date, we will not erase your personal data until the period above has expired.

- **Client Contacts/Supplier Contracts** - We will retain your personal information for as long as we receive services from you or we provide recruitment services to you and for a period of up to 2 year thereafter.
- **Referees** - We will retain your personal information for as long as a Candidate's personal information is held by us in accordance with the above retention period.
- **Referred Candidates** - If you do not wish for us to discuss potential roles with you having contacted you as a consequence of a referral as described in this privacy notice, we will not retain your personal information. If you express an interest in discussing potential roles when we contact you, you will become a Candidate for the purposes of retention.

If you choose not to give personal information

You can choose not to give us personal information when we seek to collect personal data from you at any stage in the recruitment process. We may need to collect personal information by law in certain circumstances. If you choose not to give us this personal information, it may delay or prevent us from delivering our recruitment services to you or prevent us from continuing with any particular application for a role on the basis we cannot comply with the law.

It may also be the case that a role requires us to fulfil Client Requirements to facilitate a Candidate's introduction and or progression through the recruitment process for a particular role. If you do not wish to give us personal information in response to a Client Requirement, this could mean that we cannot progress your application with the Client concerned or we cannot introduce you to a Client where we notify you prior to your introduction. We will make this clear as soon as we are aware of any Client Requirement which affects a permanent and or fixed term role you are interested in. Whilst not providing the personal information will affect the role relevant to the Client concerned, it will not affect your ability to be introduced for other roles we may have with other Clients.

Sharing your personal information

Sharing personal information with third parties

Candidates

We will share personal information in the provision of our recruitment service that we have collected about you with:

- our Clients in order that we can discuss you as a potential and suitable Candidate for a permanent and or fixed term vacancy with the Client, in order to introduce you for a role, to allow the Client to assess your suitability for an interview and or offer of a vacancy, and in order to facilitate the recruitment process (e.g. for the purpose of arranging interviews, undertaking tests etc.).
- Less commonly, we may be required to work with a master vendor, neutral vendor, or managed supplier of recruitment services to a Client (**Intermediary**), and in this circumstance we will share your personal information with the Intermediary who is managing the recruitment process for the Client and the Client. For the purposes of this privacy notice, Client shall include any Intermediary.
- With job boards, job aggregators and other third-party partners we utilise to give you the best opportunity of finding a relevant and suitable role for you.
- Our own third-party service providers who deliver services on our behalf and who may process your personal information in the performance of those services under our instruction (subject to agreements with our third-party service providers) and which include but not be limited to our accountants, auditors, legal advisors and IT service provider.
- Those third-party sources identified in the **Candidate personal information table** whom deliver services to us as we require to comply with any Client Requirements we are obliged to comply with under our contract with the Client
- Any authority; which may include but is not limited to; central and local government departments, law enforcement and fraud prevention agencies, HM Revenue & Customs, regulators and other tax authorities; other statutory regulators;
- Any potential purchaser of our business or the potential owners of any other business we may potentially wish to merge with in the future.

We will share your personal information with the above third parties where required by law or where we have a legitimate interest in doing so. We have a legitimate interest in:

- complying with our obligations under the law
- assisting the Authorities in the prevention of crime and fraud
- assisting the Authorities in maintaining national security and protecting public security

- where we believe it is necessary in connection with the establishment, defence, and or exercise of legal claims.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Client Contacts and Supplier Contacts

We will share personal information in the provision of our recruitment service or receipt of your service (as applicable) that we have collected about you with:

- Our own third-party service providers who deliver services on our behalf and who may process your personal information in the performance of those services under our instruction (subject to agreements with our third-party service providers) and which include but not be limited to our accountants, auditors, legal advisors and IT service provider.
- Any authority; which may include but is not limited to; central and local government departments, law enforcement and fraud prevention agencies, HM Revenue & Customs, regulators and other tax authorities; other statutory regulators;
- Any potential purchaser of our business or the potential owners of any other business we may potentially wish to merge with in the future.
- We will share your personal information with the above third parties where required by law or where we have a legitimate interest in doing so. We have a legitimate interest in:
 - complying with our obligations under the law
 - assisting the Authorities in the prevention of crime and fraud
 - assisting the Authorities in maintaining national security and protecting public security
 - where we believe it is necessary in connection with the establishment, defence, and or exercise of legal claims.

Transfer of personal information outside of Europe (EU members & EEA members)

- **Candidates**

We do not envisage transferring your personal information outside of Europe. However, occasionally we may be instructed on roles which are based outside of Europe and therefore personal information may be processed outside of Europe. If processing of your personal data is required outside of the Europe, and the country concerned does not have

an adequacy decision in place with the European Commission (which allows that country to be treated as a safe place to transfer and process data alongside other European country and to the standards equivalent to GDPR), we will ensure that your personal information does receive an adequate level of protection by requiring any recipient of your personal information to enter into contractual terms and conditions which requires the same level of protection afforded to processing inside of Europe (appropriate safeguards). If we are unable to put into place these appropriate safeguards, we will seek your written consent prior to introducing you for a role which requires processing outside of Europe having given you notice of the risks in having your personal data processed outside of Europe.

We confirm that your personal information is retained within our customer relationship management system (CRM) which is a cloud-based service. Your personal information is held securely on servers within Europe and backups of our system are also stored within Europe. To the extent that emails identifying you are personal data for the purposes of GDPR, we confirm that our emails are held on servers based in the UK.

- **Client Contacts**

We confirm that your personal information is retained within our customer relationship management system (CRM) which is a cloud-based service. Your personal information is held securely on servers within Europe and backups of our system are also stored within Europe. To the extent that emails identifying you are personal data for the purposes of GDPR, we confirm that our emails are held on servers based in the UK.

If we need to transfer personal information outside of Europe in the future; whether due to any system changes, appointment of new third-party service providers or otherwise, we will ensure that we have appropriate safeguards in place in order to transfer personal information outside of Europe or in the absence of appropriate measures we will only transfer such personal information outside of Europe with your written consent.

- **Supplier Contacts**

We confirm that your personal information is held securely on servers within Europe and backups of our system are also stored within Europe. To the extent that emails identifying you are personal data for the purposes of GDPR, we confirm that our emails are held on servers based in the UK.

If we need to transfer personal information outside of Europe in the future; whether due to any system changes, appointment of new third party service providers or otherwise, we will ensure that we have appropriate safeguards in place in order to transfer personal information outside of Europe or in the absence of appropriate measures we will only transfer such personal information outside of Europe with your written consent.

Your Rights and How to Complain

Under data protection laws, you have a range of rights which help to protect you in respect of our processing of your personal information. If you are unhappy with how we deal with your request to exercise your rights, or you are unhappy with our response to your request, you may make a complaint to the Information Commissioner's Office (ICO) who is the supervisory authority responsible for enforcing data protection laws in the UK. You can contact the ICO by post, by email, telephone or live chat.

The ICO details are:

- Tel: 03031231113
- Email: casework@ico.org.uk
- Mail: ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

We recommend that you read your right to make a complaint at <https://ico.org.uk/concerns/>.

Your Rights

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. We may ask you to verify your identity as part of our security measures for the protection of personal information. We may also ask you for more information regarding your request in order to ensure that we meet our obligations fully. Whilst no fee is generally chargeable for access requests, we reserve the right to charge a fee if you make repeated requests, ask for further copies of our disclosure, or your request is considered excessive in our reasonable view. We may also decline your request for access if we believe that your request is vexatious.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below). However, please note:
 - we may not be able to erase certain personal information due to our continuing legal obligations or in other circumstances allowed under data protection laws.

- we cannot guarantee that you will not be contacted by us following erasure if your personal information remains in the public domain (e.g. if you have published or uploaded information to job boards and Networking Sites) and we suggest that you allow us to retain a personal identifier for our list of individuals we should not contact in an effort to prevent you being contacted again (if you request this as part of or as a consequence of any request to erase your personal information).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. We have a right to reject your request if we decide that our interests in continuing to process your personal information override your interests, rights and freedoms in certain circumstances.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it. We can only store your personal information during this time and will not delete or otherwise use your personal information, except in relation to Legal Claims, where it is to protect the rights of another person, or it is for reasons of important public interest., or where you have consented to a particular use.
- **Right not to be subject to automated decision making and profiling**

Request the transfer of your personal information to another party (this will only apply to personal information which is processed on the grounds of consent and which is processed by automated means by us)

Contact Us - Your Rights

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing at: Data Protection Manager, F.J.Wilson Limited), is 3 King's Court, Willie Snaithe Road, Newmarket, Suffolk, CB8 7SG, UK.

Right to withdraw your consent - Where you have been asked for consent for processing, you can withdraw your consent at any time. If your consent relates to a Client Requirement, you understand that we may not be able to progress your application for the vacancy concerned. If this is the case, we will let you know. Please note that you can only withdraw your consent to processing activities to which you have consented.

You can withdraw your consent by emailing us at dataprotection@fjwilson.com