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## **DP5 - Privacy Notice**

<b>Company Name:</b>	ProMatch Consultancy Limited
<b>Company Contact Details:</b>	Claire Cookson (Managing Director) Tel: 07500016596 Email: <a href="mailto:claire.cookson@promatchconsultancy.com">claire.cookson@promatchconsultancy.com</a>

ProMatch Consultancy Limited operates as a recruitment business which provides work-finding services. 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 under applicable European data protection legislation.

References in this Privacy Policy to “Company,” “we,” “us,” or “our” relate to ProMatch Consultancy Limited, registered at 18 Stafford Street, Tain, Ross-Shire, United Kingdom, IV19 1AZ.

You may provide your personal details to the Company directly, such as through an application or registration form or via our website. Alternatively, we may collect your details from another source, such as a job board. The Company must have a lawful basis for processing your personal data. For the purpose of providing you with work-finding services and/or information regarding roles relevant to you, we will only use your personal data as outlined in this Privacy Policy. The Company is committed to complying with all applicable data protection laws at all times.

By accepting this Privacy Policy, you confirm that you understand and consent to the use of your personal data as described herein. If you do not agree to the terms of this Privacy Policy, please refrain from using our website or providing us with your personal information.

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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 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:

- To comply with a legal obligation that we have
- Where you have consented to the processing
- Where we have a legitimate interest
- To fulfil a contractual obligation that we have with you
- When it is in the public interest
- When it is in your vital interests

### **b. Legitimate interest**

This is where the Company has a legitimate business or commercial 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;

If we do use legitimate interests as a reason to process your personal data we will tell you that we are doing so and provide you with a method to raise any questions or objections you may have. However, compelling grounds for processing such information may over-ride your right to object.

### **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 choose not to provide your personal data it may prevent us from meeting statutory and legal obligations or fulfilling a contract. Not providing your personal data may mean we are 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 (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
- Third parties necessary to provide you services with ProMatch Consultancy Limited including our CRM system
- Third parties you ask us (or permit us) to share your data with
- Credit reference agencies
- Law enforcement agencies, regulators and other authorities
- Fraud prevention agencies
- Identity verification agencies
- Auditors who are assessing the compliance and processes of the business to ensure its adherence to all relevant legislation and good practice guidance

**2. Information Collected**

The information and data about you which we may collect, use and process includes the following:

- Information that you provide to us by filling in forms on the website or any other information you submit to us via the website, e-mail or face-to-face
- Records of correspondence, whether via the website, email, telephone, face-to-face or other means
- Your responses to surveys or customer research that we carry out from time to time
- Time and attendance data
- Details of the work you have been assigned with our clients
- Details of your visits to the website including, but not limited to, traffic data, location data, weblogs and other communication data

**3. Data transfers outside of the EEA**

The Company may transfer the information you provide to us to countries outside the UK and/or the European Economic Area ('EEA') for the purposes of providing you with work-finding services. We will only transfer your data outside of the EEA where:

- You have given your explicit consent, or
- It is necessary for us to set up or fulfil a contract you have entered into with us; or
- To comply with a legal duty or obligation

If we do transfer your personal data outside of the EEA, we will take measures to ensure adequate protection exists either through appropriate contractual arrangements or as required by law.

The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

#### 4. 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.

Where the Company 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 the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal 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 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 and sensitive personal data you have the right to withdraw that consent at any time by contacting Claire Cookson (Managing Director) via email: [claire.cookson@promatchconsultancy.com](mailto:claire.cookson@promatchconsultancy.com)

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.**

#### 6. Cookies

We may obtain data about you from cookies. These are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies also enable us to deliver more personalised content.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, please refer to our Cookie policy.

#### **7. 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.

#### **8. 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.

#### **9. 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.

#### **10. Data Security**

The Company takes every precaution to protect users' information.

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: [claire.cookson@promatchconsultancy.com](mailto:claire.cookson@promatchconsultancy.com).

#### **11. Changes to this privacy policy**

We will update this policy from time to time so please review it frequently.

If any material changes are made to this Privacy Policy we will use reasonable endeavours to inform you in advance by email, notice on the website or other agreed communications channels. We will communicate the changes to you in advance, giving an appropriate amount of time for you to consider and understand the changes before they become effective.

We will not enforce material changes to the Privacy Policy without your express consent. If you decline to accept the changes to the Privacy Policy, or otherwise do not accept the changes within the time period, we may not be able to continue to provide our services.

## 12. Complaints or queries

If you wish to complain about this Privacy Policy or any of the procedures set out in it please contact:

Claire Cookson (Managing Director)

Tel: 07500016596

Email: [claire.cookson@promatchconsultancy.com](mailto:claire.cookson@promatchconsultancy.com)

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.