

PRIVACY POLICY

Introduction

Welcome to Just Recruitment Solutions Limited's privacy notice. Just Recruitment Solutions Limited shall be referred to as "**JRS**", "**we**", "**us**", "**our**" throughout this privacy notice.

JRS respects the privacy of both its employer clients and its individual candidates and is committed to protecting all personal data provided to it. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), or when you provide us with personal data in other ways, and will tell you about your privacy rights and how the law protects you.

This privacy notice contains the following information:

- 1. Important information and who we are**
- 2. The data we collect about you**
- 3. How your personal data is collected**
- 4. How we use your personal data**
- 5. Disclosures of your personal data**
- 6. International transfers**
- 7. Data security**
- 8. Data retention**
- 9. Your legal rights**
- 10. Glossary**

Please use the Glossary to understand the meaning of some of the terms used in this privacy notice.

- 1. Important information and who we are**

Purpose of this privacy notice

This privacy notice aims to give you information on how JRS collects and processes your personal data through your use of this website, including any data you may provide through this website when you register as a candidate, or when you apply for a job through the website. This privacy notice will also set out how we will deal with personal data which you provide to us in other ways.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

JRS is the controller and is responsible for your personal data.

We have appointed a Data Compliance Team who are responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Compliance Team using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Just Recruitment Solutions Limited

Data Compliance Team: Shaun Pascoe: *shaun@justrecruitmentsolutions.co.uk*

Thalia Levers: *thalia@justrecruitmentsolutions.co.uk*

Postal address: Suite 8b, Cringleford Business Centre, Intwood Road, Cringleford, Norwich, Norfolk, NR4 6AU

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 16 May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you and we have grouped together the personal data that we may collect, use, store and transfer as follows:

- **Candidate Data** includes a candidate's name, address, phone number, email address, CV and employment preferences.
- **Client Data** includes a client contact's name, job title, email address and phone number.
- **Financial Data** includes a client's bank account details.
- **Transaction Data** includes details about payments to and from a client and other details of candidates who have been employed by a client.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not knowingly or actively collect any **Special Categories of Personal Data** about any candidate or client (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we knowingly or actively collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you (for example, to provide the recruitment services you have requested), and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case we may not be able to provide the services, but we will notify you if this is the case at the time.

3. How your personal data is collected

We use different methods to collect data from and about candidates including through:

- **Direct interactions.** As a candidate, you may give us your Candidate Data by registering as a candidate or applying for a job on this website, requesting for us to contact you or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - request for us to contact you;
 - register as a candidate on our website;
 - apply for a specific job on our website;

- request marketing to be sent to you;
 - make an enquiry;
 - enter a competition, promotion or survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies (“**Technical Data**”). Please see our cookie policy [[LINK](#)] for further details.

Third parties or publicly available sources. We may receive personal data about you from various third parties, including Candidate and Client Data from publicly available sources such as LinkedIn, Companies House and the Electoral Register based inside the EU.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

See below to find out more about the types of lawful basis that we will rely on to process your personal data.

We will always obtain a candidate’s consent before sending any Candidate Data to a prospective employer.

We will also rely on consent as a legal basis for processing a candidate’s personal data when sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new candidate	(a) Candidate	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To register you as a new employer client	(a) Client (b) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To provide recruitment services which a candidate has requested including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Candidate (b) Client (c) Marketing and Communications (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (for example, to recover debts due to us)
To provide recruitment services which a client has requested including: (a) Managing payments, fees and charges (b) Collect and recover money owed to us	(a) Client (b) Candidate (c) Financial (d) Marketing and Communications (e) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (for example, to recover debts due to us)
To manage our relationship with clients and candidates you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or responding to an enquiry	(a) Candidate (b) Client (c) Transaction (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to analyse how customers use our services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Candidate (b) Client (c) Financial (d) Transaction (e) Marketing and Communications	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website	(a) Candidate	Necessary for our legitimate interests

content and advertisements to candidates and clients and measure or understand the effectiveness of the advertising we serve to you	(b) Client (c) Marketing and Communications	(to analyse how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, client and candidate relationships and experiences	(a) Candidate (b) Client (c) Financial (d) Transaction (e) Marketing and Communications	Necessary for our legitimate interests (to define types of candidates and clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to candidates and clients about services that may be of interest to you	(a) Candidate (b) Client	Necessary for our legitimate interests (to develop our services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us (including jobs which we think a candidate may be interested in)

We may use your Candidate Data to form a view on what sort of job role you may want or need, or what vacancy may be of interest to you. This is how we decide which vacancies may be relevant for you.

You may receive marketing communications from us if you have requested information from us or used our services and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside JRS for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages by [contacting us](#) at any time.

Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of the services you have requested, or any other transaction with us.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**).

7. Data security

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

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

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available on request by [contacting us](#).

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#)

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.