



Company Name:	1 st Choice Staff Recruitment Ltd - Co Reg: 07972006
Company Contact details:	Data Controller : St Loyes Street Bedford, MK40 1EP Tel: 01234 210025 Contact : Gill Knight MD / Debs Kelly Finance Manager
Privacy Notice	Privacy Notice GDPR
Topic:	Data protection
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Version:	1

The Company is a recruitment business which provides work-finding and recruitment services to both its clients and work-seekers. The Company must process personal data (including at times sensitive personal data – for which we will gain your specific consent) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as via a job application or registration form, or via our website, or we may collect them from another source such as a jobs board, referral from mutual contact, or Linked In for example. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

1. Collection and use of personal data

The personal data we collect from you is as follows:

- Name and address
- Contact details
- Bank details
- Copy of ID and Right to work (passports, birth certificate, work permits, utility bills)
- NI number
- Curriculum Vitae

This data is obtained to provide work finding services, as we are obliged to confirm the identity and right to work of our work seekers and to provide payment and make the necessary deductions applicable by law.

Should we be required legally to obtain any other special categories of sensitive data from you, for example for criminal conviction checks (if required by law) then we will do so under a specific consent from you at that time.

a. Purpose of processing and legal basis

The Company will collect your personal data and will process your personal data for the purposes of providing you with work-finding services. The legal basis we rely upon to offer these services to you is:

- Legitimate interest

b. Legitimate interest

Where the Company has relied on a legitimate interest to process your personal data our legitimate interests are as follows:

- For the purposes of providing you with work finding services
- To deliver recruitment services to our client customers
- To contact you by email, telephone, messaging, to discuss potential suitable opportunities with you, or to inform you of any necessary points or changes in our services
- Processing payment for your work should you be working as a temporary worker under a contract for services with the Company.
- To comply with legal and statutory obligations pertaining to pension law
- In order to deduct tax and NI as legally required
- To maintain our records and accounts

c. Recipient/s of data

The Company will process your personal data and if necessary, sensitive personal data, with the following recipients:

- Companies (Clients) who have instructed us for recruitment services and their recruitment portal providers if applicable
- Our software providers for our CRM system
- If you are working in an assignment placed by us, our pension providers, our payroll software providers, HMRC etc.
- Our software support providers who support our IT/databases/backups etc.
- Governing bodies such as the Recruitment and Employment Confederation, when we may have audits, the Gangmaster Licencing Association etc.
- Another tier recruiter should we have such an arrangement in place
- HMRC/Police/Immigration if requested and required by law to do so.

d. Statutory/contractual requirement

Your personal data is not normally required as part of a statutory and/or contractual requirement, and/or a requirement necessary to enter into a contract, unless we work with a client that requires us to upload your CV and details onto a recruitment portal. If you are not prepared for us to take additional data that may be required on such an occasion that you have not already provided, then this may prevent an application for that position.

2. Data retention

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time. We will retain your personal data for five years from our last contact, unless the law requires us to do otherwise.

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.

Where the Company has obtained your consent to process your 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 sensitive personal data.

3. Your rights

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

- The right to be informed about the personal data the Company processes on you; once we receive your request we will respond within 30 days. There are no fees applied for the first request but subsequent requests for the same data which are unfounded or excessive may be subject to an administration fee
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data; you may contact us to update or rectify any data we hold on you and we will update this
- The right to erasure of your personal data in certain circumstances; when we receive your request we will confirm if we can erase all of your data or whether we need to retain any of it to comply with a legal obligation
- 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 sensitive personal data you have the right to withdraw that consent at any time by contacting Gill Knight or Debs Kelly on gill@1stchoicerec.com or debs@1stchoicerec.com

4. Automated decision making

Your details will be held on a computerised candidate management system. Because of this, parts of our search functionality may be automated to identify a potential short list of candidates for any specific role. The complete short-listing process is never totally automated, as many other aspects are taken into account apart from skill sets when recruiting for our clients.

5. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Gill Knight, Managing Director on gill@1stchoicerec.com

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.

Changes to this notice; we keep this privacy notice under regular review and will place any updates on this web page www.1stchoicerec.com