



MARCHWOOD

PRIVACY NOTICE

Marchwood Recruitment Limited (Company Number: 15464446) of 37 Redhill Road, Rowlands Castle, PO9 6DE is a "Data Controller".

As a Data Controller, we are responsible for deciding how we hold and use personal information and we are required under data protection legislation to notify you of the information contained in this Privacy Notice.

The information in this notice applies to all Data Subjects whose Personal Data we hold, including our employees, candidates and clients, and prospective candidates and clients. This notice does not form part of any contract for the provision of services. We may update this notice at any time.

It is important that you read this notice, together with any other Privacy Notice we may provide on specific occasions when we are collecting or processing personal information, so that you are aware of how and why we are using such information.

DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for the valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about.
4. Accurate and kept up to date.
5. Kept for a period that is only as long as necessary for the purposes we have told you about.
6. Kept securely.

THE KIND OF INFORMATION WE HOLD 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 will collect, store, and use the following categories of personal information about you, depending upon the processing that we will perform:

- Name
- ID
- Telephone numbers
- Home address
- Email addresses
- Details regarding your current employment
- Date of birth
- Professional memberships
- Current agency
- Visa status
- Bank account details
- References
- CV (including details published on publicly-available forums, such as LinkedIn and job boards)
- Nationality
- National Insurance Number
- Tax code



- Certificate of VAT registration
- Certificate of Incorporation
- Payroll information

We do not usually collect sensitive information but, where we need to do so, we will inform you of the reasons for doing so and get your express consent.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We collect personal information through publicly-available forums, including LinkedIn and job boards; directly over the telephone and in person; via our website; and by way of referral from other individuals and from recruitment bodies. We may also receive information from current candidates who are looking to introduce their friends, colleagues and peers to our services from time to time.

HOW WE WILL USE INFORMATION ABOUT YOU

We use personal information for the following purposes:

1. To perform a contract that we have with our candidates/clients or employees. This might include passing personal information to prospective hirers and to third party payroll providers.
2. To market and sell our services to prospective candidates/clients.
3. To introduce candidates/clients to our brand partners.
4. To pass information to HMRC.
5. To provide information to you where you have requested us to do so.

Where you request information to be sent to you from us, our lawful basis will be consent.

Where we process personal information to market and sell our services, our lawful basis is Legitimate Interest but in some circumstances we may rely on your consent.

Where we process personal information to perform a contract that we have with candidates/clients or employees, our lawful basis is Performance of a Contract.

Where we process personal information to market and sell our services, our lawful basis is Legitimate Interest.

Where we pass personal information to brand partners, we rely upon Consent.

Where we pass information to HMRC, our lawful basis is our Legal Obligation.

Where we rely upon Legitimate Interest, we have considered whether the Data Subject can reasonably expect processing for that purpose to take place and whether the interests and fundamental rights of the Data Subject over-ride that.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing our services to you or your business), or we may be prevented from complying with our legal or regulatory obligations (such as to report financial impropriety in relation to anti-money laundering).

CHANGE OF PURPOSE

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent
2. Where we need to carry out our legal obligations

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

DATA SHARING

We may share your data with third parties, including third party service providers and recruitment businesses.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU in some circumstances which will be explained to you ahead of data being transferred. If we do, you can expect a similar degree of protection in respect of your personal information.

The following third parties process personal information, collected by Marchwood Recruitment Limited, for the following purposes:

Bullhorn CRM	In order to manage member and prospective member records and to allow us to perform our contract with existing candidates.
Prospective employers or end clients	In order to allow us to perform our contract with you by sharing your information with prospective employers or end clients.
HMRC	For tax compliance activities.
End clients	To whom you are engaged to provide services, to enable them to manage your engagement; protect your health and safety at work; process working time and comply with their legal, regulatory and contractual obligations in relation to the same.
Kudo	To facilitate the payment of our employees.
Quba Solutions	To facilitate the payment of contractors.
Cloud Call	To utilise mobiles and calling out identification.
Confidential Waste Disposal Provider	To allow us to securely dispose of confidential waste in line with our obligations.

DATA SECURITY

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.

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.

DATA RETENTION

How long will you use my information for?

We will only retain your personal information 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. Details of the retention periods we apply are available upon request from the Data Protection Leader by email request admin@marchwooduk.com.

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.

YOUR RIGHTS AS A DATA SUBJECT

Your duty to inform us of changes

It is important that the personal information we hold is accurate and current. Please keep us informed if your personal information changes.

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.
- **Request correction** of the personal information to ensure it remains accurate and up to date.
- **Request erasure** of some or all of your information which we hold on you, subject to us complying with our legal and regulatory obligations which may override your right to request erasure.
- **Request that we cease processing** some or all of your information, in whole or in part, subject to our legal and regulatory obligations which may override your right to request that we cease processing.
- **Request that your data is transferred to a third party** (portability) in the event that you look to use the services of a third party (such as if you choose to use another recruiter or apply for a mortgage), we will share data relating to your engagement with us with such third party, upon request.
- **Object** to some or all of your data being processed by us (either temporarily or permanently). This will be subject to our legal and regulatory obligations which may override your right to object.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

RIGHT TO WITHDRAW CONSENT

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the person at Marchwood to whom you gave your consent, or email admin@marchwooduk.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, subject to our legal and regulatory obligations.

COMPLAINTS



If you have any complaints regarding Marchwood's data protection compliance, you should email: admin@marchwooduk.com.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this Privacy Notice at any time.