



Flora&CoAssociates

## Privacy Policy

### Policy Statement

The General Data Protection Regulation came into force on 25th May 2018. It now replaces the UK Data Protection Act. The new regulations give customers greater rights with regards to the data businesses hold relating to them. In order for any business to retain or process your data, they must have a legal reason to do so.

Our Data Protection Officer is Dee Kaur

Contact Details: [dee.kaur@floracoassociates.co.uk](mailto:dee.kaur@floracoassociates.co.uk) 0121 828 1010

Address: 2A Blackthorn House, St Paul's Square, Birmingham, B3 1RL.

### Who we are and what we do

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We collect the personal data of the following types of people to allow us to undertake our business: prospective and placed candidates for permanent roles; prospective and live client contacts; suppliers to support our services; and employees and consultants.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Even though the UK has expressed its intention to leave the EU, the GDPR will be applicable in the UK from 25th May 2018. The Government intends for the GDPR to continue in UK law post Brexit and has also introduced a Data Protection Bill to replace the current Data Protection Act in due course.

Data is processed from (but is not limited to) the following;

Website Users;

Prospective and placed candidates for permanent or temporary roles;

Prospective and live client contacts;

Supplier contacts to support our services;

Employees, consultants, temporary workers;

We collect information about you to carry out our core business and ancillary activities.

### Information you give to us or we collect about you

This is information about you that you give us by corresponding with us by phone, e-mail or otherwise.

The information you give us or we collect about you will include your name, address, private and corporate e-mail address and phone number, financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, or corporate website.

We only collect relevant information in order for advise clients and candidates on recruitment matters. We do not use the data in any other way.

### **Information we collect about you when you visit our website**

With regard to each of your visits to our site we collect the following information: technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information if applicable, browser type and version.

information about your visit, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs, and any phone number used to call our customer service number.

### **Information we obtain from other sources**

This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, your business card, and personal recommendations.

We do not actively communicate our privacy policy as it is reasonable for someone to expect that we will use their information for recruitment purposes. This is why we have made our privacy information available here.

We are can work closely with third parties including clients, sub-contractors in technical, professional, and other services, analytics providers, search information providers, credit reference agencies, and professional advisors. We may receive information about you from them for the purposes of our recruitment services and consulting services.

### **Purposes of the processing and the legal basis for the processing**

We use information held about you to:

Provide the core service of recruitment; the introduction of candidates to clients to take up permanent roles. We also give individuals advice throughout their careers so they can make informed decisions. We also advise clients on hiring strategies and the competitive landscape.

Carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.

Our legal basis for the processing of personal data is our 'legitimate interest', described in more

detail below. We will also rely on 'contract', 'legal obligation' and 'consent' for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on to you to fulfil our legal obligations as a recruitment firm.

We will rely on consent for particular uses of your data. Examples include permission to introduce you to a client, or sharing your contact details with a client during an interview process.

## **Our Legitimate Business Interests**

Our 'legitimate interests' in collecting and retaining your personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent and temporary employment. The exchange of personal data of our candidates and our client contacts is a fundamental and essential part of this process. We are unable to function as a business without doing so.

In order to support our candidates over their careers and our clients when they are hiring we require a database of candidate and client personal data. This will cover historical data as well as current data that enables us to operate as a business.

To maintain and develop our business we need to record the personal data of prospective candidates and client contacts.

## **Consent**

Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time. Consent is always required to share your personal details with any prospective client.

**Other uses we will make of your data:** use of our website; to notify you about changes to our service; and to ensure content from our site is presented in the most effective manner on your computer or device.

We will use this information:

1. To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
2. To improve our site and its appearance on your device
3. To keep our site safe and secure for all users
4. To measure and understand the effectiveness of advertising.
5. To deliver relevant advertising to you
6. Competitions and marketing.

## **Cookies**

We do not track cookies. Any change to this policy will be noted here.

## **Disclosure of your information inside and outside of the EEA**

We will share your personal information with:

Selected third parties including:

Clients for the purposes of introducing candidates to them;  
Candidates for the purposes of arranging interviews and engagements;  
Previous employers for the purposes of referencing  
Clients, business partners, suppliers and sub-contractors so we can carry out contractual duties  
Subcontractors including event organisers, factoring companies, umbrella payroll companies, professional advisors including but not limited to solicitors and accountants  
Advertisers that require data to serve relevant adverts to you and others. We do not disclose identifiable individuals to our advertisers  
Analytics and search engine providers  
Compliance partners and other companies or bodies for the purpose of assessing your suitability for a role where this is a condition of us entering into a contract with you.

## **We will disclose your personal information to third parties:**

In the event we sell or buy any business or assets;  
If we are legally required to do so e.g. fraud protection etc;  
If we have to apply our terms of use or other agreements;  
To protect the rights, property or safety of Flora Co Associates or our clients.

## **The lawful basis for the third party processing will include:**

Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs;  
Satisfaction of their contractual obligations to us as our data processor;  
To carry out a contract  
To follow a legal requirement

## **Where we store and process your personal data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All of our business uses a secure remote desktop environment for all candidates and client data processing. All the data is stored according to GDPR regulations.

We use Microsoft 365 from Microsoft for business applications like email. This data is stored in North America, not the EU. Mobile devices require passwords to access.

Any system breaches will be reported to the ICO within 72 hours of us becoming aware of the issue.

Unfortunately, the transmission of information via the internet is not completely secure. While we

do our best to protect your personal data, we cannot guarantee the security of your data at all times; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## Retention of your data

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so.

Data is retained for 5 years, at which point it is reviewed and deleted if appropriate

We do the following to ensure our data is accurate:

We check that we have accurate information about you and your career

We check public sources such as corporate websites and LinkedIn etc

We reference you with individuals in the markets

We can pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

## Your rights

You have the right to ask us not to process your personal data for marketing purposes.

You can exercise your right to accept or prevent such processing at any time by contacting us at [dee.kaur@floracoassociates.co.uk](mailto:dee.kaur@floracoassociates.co.uk)

Our site may contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### The GDPR provides you with the following rights to:

**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.** You can ask us to delete or remove personal information at any point. 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).

**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.

**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 to establish its accuracy or the reason for processing it.

**Request the transfer** of your personal information to another party in certain formats, if practicable.

**Make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

### **Access to information**

GDPR gives you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete.

Your right of access can be exercised in accordance with GDPR.

A subject access request should be submitted to [dee.kaur@floracoassociates.co.uk](mailto:dee.kaur@floracoassociates.co.uk). There is no fee for this. We will respond within 1 month.

### **Changes to our privacy notice**

Any changes we make to our privacy notice in the future will be posted on this page. Please check back to see any updates or changes to our privacy notice.

### **Contact**

Questions and comments regarding this privacy notice are welcome. Please address them to [dee.kaur@floracoassociates.co.uk](mailto:dee.kaur@floracoassociates.co.uk)