

Who we are

Company Name:	Sword IT Solutions Limited (including Venture Information Management Ltd, Minttulip Limited (‘the Company’)
Company Contact details:	Sword IT Solutions 1000 Great West Road, Brentford, TW8 9HH Company Representative:- Neil Turner SITS-Data.Compliance@sword-group.com
Privacy Notice	Job Applicant Privacy Notice
Topic:	Data Protection
Date:	1 st February 2018
Version:	Rev 001

Thank you for looking at our Job Applicant Privacy Notice. This Privacy Notice advises how the Sword IT Solutions group of companies (‘the Company’) processes the personal information of job applicants who apply to us for a position or opportunity.

A separate generic Privacy Notice is available along with a Privacy Notice for Employees, Contractors and Workers and relating to Cookies. Please note this is not an exclusive description of how ‘the Company’ processes the personal information of individuals.

There is a separate Privacy Notice for Employees, Contractors and Workers

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What do we do

The Company is one of the leading technology solution providers in the UK. Our strength lies in our ability to work collaboratively with our customers towards a shared goal. We focus on delivering measurable business benefits by taking the time to understand our Customers key challenges before applying our industry knowledge to help resolve them.

The Company must process personal data (including sensitive personal data) 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 on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a lawful basis for processing your personal data and we will only use your personal data in accordance with this privacy statement. At all times we will comply with current data protection laws.

Collection and use of personal data

Purpose of processing and legal lawful basis

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work finding services.

Examples of this data may include your Contact details (name, address, telephone numbers, email addresses), Date of Birth, Nationality, CV, Employment Record, Education History, Professional Qualifications and Certificates, Interview Notes, Pay and Benefit details, timesheet and rate information from previous engagements and communications (voicemails, emails) gathered through the process.

Uses of this personal data may include for example:-

- Contacting you about job opportunities
- Assessing your suitability for those opportunities
- Updating our databases
- Putting you forward for job opportunities
- Asking you for referees
- Arranging payments to you
- And developing and Managing our services and relationship with you and our clients.
- information requests - using contact information (from web forms, emails, mail and telephone) to send you information or provide a service;
- to carry out research about the use of our website
- To deal with any complaint you might make to us

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In some cases 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 lawful basis to process your personal data. The lawful bases we rely upon to offer our services to you are:

- Where we have a legitimate interest
- Your consent
- To comply with a legal obligation that we have (such as checking eligibility to work in the UK and formal identification documentation to verify your identity)
- To fulfil a contractual obligation that we have with you

Legitimate interest

This is where the Company has a legitimate 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 are as follows:

- To be able to communicate with you in relation to the recruitment process (using your contact details such as your title, name, address, telephone number and personal email address)
- To consider your suitability for the job/opportunity you are applying for (referring to your CV, employment records, previous engagement timesheets/rates, education history, professional qualifications and certifications)
- To assess your suitability for the role using any interview notes made by us during or following an interview with you
- To help determine whether a job/opportunity offer may be made to you by referring to Pay and benefit details
- In order to progress the application through the recruitment process reference to voicemails, emails, correspondence, and other communications created, stored or transmitted by you on to our computer or communications equipment
- Managing our database and keeping records up to date appropriate to the nature of your communication with us
- Contacting you to seek your consent where we need it
- Providing work finding services to you and our clients, including sending your information to our clients when you have demonstrated an interest in doing that particular type of work (or other work we feel you may be able to undertake based on our records and experience of your previous engagements) but not expressly consented to us passing on your CV
- Giving you information about similar products or services that you have used from us recently
- Disclosure of information relating to potential criminal acts or security threats
- To gather references if and when required

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Statutory/contractual requirement

The Company has certain legal and contractual requirements to collect personal data (e.g. to comply with immigration requirements). Our clients may also require this personal data, and/or we may need your data to enter into a contract with you. If you do not give us personal data we need to collect we may not be able to continue to provide our services to you.

Disclosure of your personal information

There are circumstances where we may wish to or have to disclose your personal data to third parties. This will only take place in line with the purposes listed above and any applicable law.

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Clients (whom we may introduce or supply you to)
- Former employers whom we may seek references from
- Payroll service providers who manage payroll on our behalf or other payment intermediaries whom we may introduce you to
- Other recruitment agencies in the supply chain
- To our subsidiaries, branches or associated offices
- Any third parties who carry out audits to ensure that we run our business correctly
- Our insurers, legal advisers
- Government, law enforcement agencies and other regulators e.g. the Police, Home Office, HMRC, Local Authority Designated Officers (LADOs), GLAA
- To any other third party where you have provided your consent

Information to be provided when data collected not from the data subject

Categories of data

Examples of Personal data that we hold about you may include your Contact details (name, address, telephone numbers, email addresses, social media account profiles and links), Date of Birth, Nationality, CV, Employment Record, Education History, Professional Qualifications and Certificates, Interview Notes, Pay and Benefit details and communications (voicemails, emails), information from referees, client representatives, and/or previous colleagues gathered through the process and your function/job title within a company along with your work email address, company name and contact details.

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Source of the personal data:

The Company may have sourced your personal data/sensitive personal data from:-

- Professional networking sites such as Linked In
- Public information sources and third party organisations - through jobs boards and/or social media LinkedIn
- Referrals such as from a former or current employer or colleague
- A referee whose details you previously provided to us
- Recruitment agencies with whom you have had a relationship
- Cookies listed in section 7
- Marketing Lists
- Web research
- Cookies

This information (apart from referrals) came from a publicly accessible source.

Overseas Transfers

The Company will not transfer the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

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. We will keep work-seeker records for 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. This is currently 3 to 7 years.

Where the Company has obtained your consent to process your personal/sensitive data we will do so in line with our retention policy (a copy of which is available upon request). 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/sensitive data.

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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 data/sensitive personal data you have the right to withdraw that consent at any time by contacting [our Data Protection Compliance Manager at SITS-Data.Compliance@sword-group.com](mailto:our>Data Protection Compliance Manager at SITS-Data.Compliance@sword-group.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 consider restricting the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

Automated decision-making

We can confirm that we do not use Automated decision-making processes

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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 in order 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. Please note that in a few cases some of our website features may not function if you remove cookies from your browser.

For further information please refer to our separate Cookie Policy

Log 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.

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.

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.

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Data Security

The Company takes every precaution to protect our users' information. e.g. firewalls, browser certification technology, encryption, limited access, use of passwords, two factor authentication etc.

Only employees who need the information to perform a specific job (for example Human Resources, account directors and those associated with the recruitment selection process) 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 SITS-Data.Compliance@sword-group.com**

Changes to this privacy statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.

Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact our Data Protection Compliance Manager on SITS-Data.Compliance@sword-group.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.

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