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## **PRIVACY POLICY**

### **INTRODUCTION**

This Privacy Policy applies to the personal data of Legal Leap Recruitment's Candidates, Clients, Website Users and Suppliers and explains how we collect use and process this personal data whilst complying with our legal obligations to you.

Legal Leap Recruitment is a recruitment business which provides work-finding/recruitment services to its Clients and work-seekers and we are dedicated to safeguarding the data privacy rights of all the aforementioned. 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.

If you are a Client wishing to discuss a vacancy, you may give your personal details to Legal Leap Recruitment directly, such as a phone call or email or, if you are a candidate, you may give it to us on an application or registration form or via our website, or we may collect these from another source such as a company website or jobs board.

The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding/recruitment services and/or information relating to roles/candidates relevant to you or a vacancy, we will only use your personal data in accordance with this Privacy Policy. At all times we will comply with current data protection laws.

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### 1. Collection and use of personal data

#### a. Purpose of processing and legal basis

Legal Leap Recruitment will collect data from Clients for the purposes of finding suitable candidates for your vacancies. It is imperative that we seek to supply the best candidates for your vacancies. We will receive data directly from you in two ways:

Where you contact us directly by phone or email or where Legal Leap contact you, either by phone or email, or through our consultants' business development activities regarding searching for vacancies and temporary staff requirements. This may be following up on information (such as vacancies) posted to your website. The data we collect about Clients is actually very limited. We generally only need to have your contact details or the details of individual contacts at your organisation (such as your names, telephone numbers and email addresses) to enable us to ensure that our relationship runs smoothly. If we need any additional personal data for any reason, we will let you know.

Regarding suppliers we will only need information such as the contact details of the individuals we deal with and your bank details to enable us to pay you for your services

- For candidates we will collect personal data (which may include sensitive personal data) and will process this personal data for the purposes of providing you with work-finding services. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our Clients. 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 legal basis to process your personal data. The legal bases we rely upon to offer our work-finding/recruitment services to you are:

- Your consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you

#### b. Legitimate interest

This is where Legal Leap Recruitment 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 is/are as follows:

- Managing our database and keeping work-seeker records up to date;
- Providing work-finding/recruitment services to you and our Clients;
- Contacting you to seek your consent where we need it;
- Banking information for temporary staff
- Giving you information about similar products or services that you have used from us recently;

#### c. Statutory/contractual requirement

Legal Leap Recruitment has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding 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 work-finding services to you.

**d. Recipient/s of data**

Legal Leap Recruitment 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
- Our insurers
- Our legal advisers if necessary
- Government/law enforcement agencies if required such as Police, HMRC, Home Office

**2) Source of the personal data:**

Legal Leap Recruitment may source your personal data/sensitive personal data (if provided):

- From jobs boards, or social media such as LinkedIn
- A former employer
- A referee whose details you previously provided to us
- Cookies

This information will often come from a publicly accessible source and we request that unless absolutely necessary, **sensitive** personal data is not made readily available on CVs.

**2a) Information which may initially be recorded when data is NOT collected directly from the data subject but from a job board or from social media**

**Personal data: (as stated on the information collected, usually a CV)**

- Name, address, mobile and home number, email address
- Nationality
- Work history, position, job titles, past and present employers and dates of employment
- Date of birth if you choose to supply it
- Title
- Education, training and qualifications
- Salary/notice period
- Hobbies/interests

**2b) When data is collected directly from the data subject OR when either category of candidate formally registers with the agency for work finding services, the above would be collected along with (potentially)**

**Sensitive personal data:** This data is often aligned with equal opportunities/diversity for which we have a Monitoring Equal Opportunities Form for all candidates who register for work finding services and may include:

- Health information including whether you have a disability
- Criminal convictions

- Gender
- Age,
- Sexual orientation,
- Religion
- Ethnicity
- Social-economic background
- Nationality/ passport check/identity card/ proof to work in the UK

In order to adhere to legislation we will collate this information through our voluntary Monitoring Equal Opportunities Form on an anonymised basis and, with the exception of passport checks required under Employment Regulations, would only discuss the details with Clients if there was a contractual requirement to do so or the Client specifically requested such sensitive personal data to comply with their own recruitment procedure. We would always seek the candidate's explicit consent to collect and use such information and would only do so where there was a legal entitlement. As above we advise that **sensitive** personal data is not shared with us in documentation such as your CV.

## 2c) Overseas Transfers

Legal Leap Recruitment 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.

## 3 Data retention

Legal Leap Recruitment 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. For example, 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. This is currently 3 to 6 years.

Where Legal Leap has obtained your consent to process your personal data, we will do so in line with our retention policy which states that personal data will only be kept for a period of 12 months following inactivity except in the circumstances of the previous paragraph. Upon expiry of that period the Company will delete details automatically unless we have attained further consent from you. Where consent is not granted Legal Leap will cease to process your personal data.

## 4. 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 Legal Leap processing your personal data, you have the right to withdraw that consent at any time by contacting Heather Cockbain. 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 Legal Leap 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 Legal Leap 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 restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.**

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

## 6 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.

## 7 Links to external websites

Legal Leap'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.

## 8 Sale of business

If Legal Leap Recruitment 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.

## 9 Data Security

Legal Leap takes every precaution to protect our users' information and we operate a limited access policy and the use of passwords and firewalls.

Only individuals who need the information to perform a specific job (for example, consultants, accountants, payroll and auto enrolment processors) are granted access to your information.

Legal Leap 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 Legal Leap 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 regarding our website, you can email [heather@legalleap.co.uk](mailto:heather@legalleap.co.uk)**

## 10 Changes to this Privacy Policy

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.

## 11 Complaints or queries

If you wish to comment about this privacy notice or any of the procedures set out in it please contact: Heather Cockbain

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, if you believe that your data protection rights have not been adhered to.