

# Privacy Policy

Here at E-Resourcing we are a specialist recruitment services provider, and your details may be registered on our CRM.

**E-Resourcing Limited** is a company registered in England (company no. 05447382) with its office at Oaks House, 12-22 West St, Epsom, Surrey KT18.

**E-Resourcing Belgium BV** is a company registered in Belgium (registration no. BE0565.938.382) with its office at Hanswijkstraat 37A/004, 2800 Mechelen, Belgium, together referred to as E-Resourcing.

## Who E-Resourcing are and what we do

E-Resourcing provides work seeking services as a 'recruitment agency' and 'recruitment business'. In the UK this is as defined in the Employment Agencies and Employment Businesses Regulations 2003 Act. E-Resourcing collects the personal data of the following types of people to allow it to undertake its legitimate business interests;

- Prospective and placed candidates for permanent or temporary/contract roles
- Potential, Prospective and Live client contacts
- Employees
- Supplier contacts to support our services

We collect information about you to carry out our core business and ancillary activities. This is information we obtain about you from yourself and from other sources such as LinkedIn and other social media, corporate websites, job board websites, online CV libraries, your business card and personal recommendations.

Here at E-Resourcing we take data protection very seriously. Your privacy is of the highest importance to us, as is the quality of service you receive from us. E-Resourcing wants to ensure that the information we hold about you and your business is accurate. This allows us to ensure that our communication with you, whether by phone, email, SMS text or post, is completely relevant to your needs. In consideration of the General Data Protection Regulations (GDPR), we would also like to request your permission to continue to contact you about our products and services. E-Resourcing does not sell its data to any third party.

## Working with data protection regulations

For the purposes of the Data Protection Act 1998, the General Data Protection Regulations (GDPR) and any other applicable data protection and privacy laws and regulations ("Data Protection Legislation"), E-Resourcing is the 'Data Controller' and 'Data Processor'. E-Resourcing will keep information that is

personal to you (such as your CV, your contact details, other personal information such as your nationality, skills set, educational history, experience and qualifications together with your current employment details, past work history, future job preferences, employment / character references and salary requirements and other necessary notes) for as long as reasonably required in order to provide recruitment services to you which may include:

- matching your details with current or future job vacancies
- providing you with information about job vacancies
- providing you with recruitment services
- providing you with job alerts
- answering enquiries, feedback and complaints
- maintaining internal records
- giving you information that you request from us and to improve our services
- notifying you about changes to our services.

We work closely with third parties including companies within our Group, business partners, sub-contractors in technical, professional, payment and other services, advertising networks, analytics providers, search information providers, credit reference agencies, professional advisors. We may receive information about you from them for the purposes of our recruitment services and ancillary support services.

### **Who do we provide your information to?**

Where you have provided us with your CV, and where it is necessary or appropriate to do so, we may send information relating to you to:

- prospective employers and clients (with your express permission each time) in connection with the recruitment process for them to assess your job eligibility. We will not forward your details to our clients without discussing the specific relevant position with you first and obtaining your consent to do so
- third parties where we have retained them to provide services that you or our client has requested. Some examples of these are; references, qualifications and criminal reference checking services, verification of the details you have provided from third party source, psychometric evaluation and/or skill tests; and
- companies and individuals, we engage to perform business functions and services on our behalf. Such functions may include, for example, hosting our web servers, analysing data, providing legal, accounting and marketing services

- We may also disclose your personal information:
- to prevent or detect a crime;
- if required to do so due to legal, statutory or regulatory obligations including accounting and taxation requirements; or
- in relation to the transfer of E-Resourcing's assets due to an acquisition, merger, reorganisation or otherwise

### **How do we protect your personal data?**

When we collect information about you, we also make sure that your information is protected from unauthorised access, loss, manipulation, falsification, destruction or unauthorised disclosure. This is done through appropriate technical and security measures. However, you should be aware that providing information over the Internet can never be guaranteed as being completely safe and if you choose to send such information to us via the Internet, you do so at your own risk.

### **How long do we keep your personal data?**

We keep data in accordance with the guidance of GDPR. Where you send us your details, or a third party has obtained your consent, the CV and associated CRM records and files will be kept by E-Resourcing unless you tell us otherwise. Where we have no further contact with you for over 7 years, your details will be removed from our systems.

### **Purposes of the processing**

We collect your personal information so that we can provide our services to you, including:

- providing you with information about job vacancies and to assist you in finding a suitable position;
- maintaining our business relationship with you, be it as a client and/or candidate;
- providing you with recruitment services - which may include career guidance;
- informing you of events, services and possible job opportunities using contact details you have provided;
- assisting in managing our relationship with you and our clients and performing administration or operational functions;

### **Legal basis for processing your data**

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract interests, legal obligation and consent for other specific uses of data. We will rely on contract interests 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 you to fulfil our legal obligation. For example, we have a statutory obligation to retain employee data and placement data, including details of taxation payments for 6 years from the end of our relevant financial year. We will in some circumstances rely on consent for uses of your data and in such circumstances E-Resourcing will ask for your 'Consent'. Examples of when consent may be the lawful basis for processing includes permission to introduce you to a client (if you are a candidate).

### **Our legitimate business interests for holding your data**

Our legitimate interests in collecting and retaining your personal data is because, as a Recruitment Business and as a Recruitment Agency, we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process. To support our candidates' career aspirations and our clients' resourcing needs we require a database of candidate and client personal data. To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts.

### **Consent**

Should E-Resourcing want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this processing at any time.

### **Other uses we will make of your data:**

- To notify you about changes to our service;
- To ensure that content from our site is presented in the most effective manner for you and for your computer. We will use this information to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; to improve our site to ensure that content is presented in the most effective manner for you and for your

computer; as part of our efforts to keep our site safe and secure; to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

We do not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

### **How your personal information is collected**

Personal information may be obtained through our website (e.g. when you submit your curriculum vitae or application) or via one of our recruitment consultants when you contact them, send them your CV or application (Including via a job board), connect with them on LinkedIn or similar professional networking sites, or discuss a recruitment opportunity with them. Although we do not make it compulsory to give us every item of information we ask for, the more information you volunteer (and the more accurate it is), the better we can tailor our services to your needs. If the personal information we have requested is not collected, we may not be able to provide the recruitment or other related services to you. We may occasionally contact you with information about some of our other recruitment opportunities that we feel may be of interest to you and to invite you to update the information held by us about you.

### **Disclosure of your personal information**

While providing our services we may need to disclose your personal information to other companies (including to trusted third parties) for the purposes for which it is primarily held or for a related or secondary purpose.

We may:

- disclose or transfer your personal information to prospective employers/clients where you are interested in an available position and have given express permission that we may disclose it;
- disclose your personal information to third parties who perform functions on our behalf and who also provide services to us, such as IT consultants carrying out testing and development work on our business technology systems, our accountant disclose your personal information to third parties for the purposes of due diligence in the event of a proposed sale, merger, liquidation, receivership or transfer of assets, or as required by law;

- in the event of a sale, merger, liquidation, receivership or transfer of assets disclose your personal information to third parties provided that they agree only to use your personal information for the purposes that you have provided it to us;
- disclose aggregate statistics about our site visitors and candidates in order to describe our services to prospective partners, clients and other reputable third parties and for other lawful purposes – in such cases these statistics will include no personally identifying information.

We may disclose personal information, if required to do so by law, a court order or by a regulatory authority of competent jurisdiction or if we believe that such action is necessary to protect, defend or enforce the rights of E-Resourcing.

### **Transferring your personal information across international borders**

Where you apply for roles with employers/clients based outside the country from which you are applying, your personal information will be sent to that country. By submitting your personal information to us, you are agreeing to your personal details being transferred to offices outside of the country from where you are applying for roles and to prospective employers (that you have agreed to) in those countries.

### **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;
- For the purpose of a contract in place or in contemplation;
- To fulfil their legal obligations.

### **Security and storage of personal information**

Safeguarding personal information and respecting confidentiality of your information is important to E-Resourcing. All information you provide to us is stored on secure servers in the U.K. and we will take the necessary steps, including putting in place adequate technical and organisational measures, to protect your personal information. While we have security measures in place to protect against the loss, misuse and alteration of personal information under our control we cannot guarantee that loss, misuse or alteration of personal

information will not occur. We do the following to try to ensure our data is accurate:

- Prior to making an introduction we check that we have accurate information about you
- We keep in touch with you, so you can let us know of changes to your personal data

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may 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.

### **Using our website – Internet based transfers**

Given that the Internet is a global environment, using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis. Therefore, by browsing our website and communicating electronically with us, you acknowledge and agree to our processing of personal data in this way. There are inherent risks in transmitting information across the internet. E-Resourcing cannot guarantee that the personal information you submit will not be intercepted by others when it is submitted to us over the internet.

### **Your rights and your personal data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- **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. This enables you to ask us to delete or remove personal information where there is no good reason for us to continue to process it. 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 us to establish its accuracy or the reason for processing it
- **Request the transfer** of your personal information to another party, subject to certain conditions

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please [remove@e-resourcing.com](mailto:remove@e-resourcing.com)

If you wish to make a complaint about any aspect of your data under this section, then you have the right to 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/>

### **How can you access the personal data we have on you?**

You have the right to request access to the personal information we have relating to you. You can do this by contacting us at [info@e-resourcing.com](mailto:info@e-resourcing.com). In order to comply with your request, we may ask you to verify your identity. We will fulfil your request by sending a copy of your personal data electronically unless the request expressly specifies a different method.

### **How can you correct or delete your personal data?**

If you believe that the personal data we have about you is incorrect, you are welcome to contact us so that we can update it and keep your data accurate. Please ensure that any CV provided to us is updated from time to time in accordance with your current circumstances.

If at any point you wish for us to delete information about you, you can simply email us at [remove@e-resourcing.com](mailto:remove@e-resourcing.com).

### **How can you contact us?**

Please contact us at [info@e-resourcing.com](mailto:info@e-resourcing.com) if you have any questions, comments or requests.