

PRIVACY POLICY

1. About this Privacy Policy

We are an employment business which seeks to find individuals work with our hirer clients and provides the services of workers we have engaged (**Workers**) to the hirer. This privacy policy is designed to give you, the Worker, information as to how we will obtain and process personal data relating to you in connection with the services we provide to you. It is important that you read this Privacy Policy together with any other privacy notice when we are collecting or processing personal data about you. We will process your personal data as a “data controller”. This means that we have responsibility (on our own or acting jointly with another party) for deciding how we hold and use personal data relating to you.

2. Who we are and how to contact us

Willow Recruitment (London) Ltd (**Company, We, us, our**) is a limited company registered in England and Wales under company number 10517841 and has its registered address at 27 Old Gloucester Street, London, WC1N 3AX.

Willow Recruitment (London) Ltd is a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Business Regulations 2013. We collect personal data from the following types of people to allow us to undertake our business.

- Prospective and placed candidates for permanent, contract roles and other job positions.
- Prospective and live clients contacts
- Supplier contacts to support our services
- Employees, consultants, temporary workers

3. The data we collect and process 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 may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** including name, title, date of birth, nationality, gender, and place of birth.
- **Contact Data** including postal address, residential address, email address and telephone numbers, next of kin.
- **Worker Status Data** including visa information, passport information, and information relating to your right to work in the UK.
- **Payroll and PAYE Data** including bank details, national insurance number, tax code, information relating to hours worked and rate of pay. For limited liability companies, this will include your company registration certificate and information pertaining to your public liability insurance.
- **Criminal Record Data**, for a DBS Check, including the last five years of residential address history.
- **DVLA Data**, including details on driving history like penalty points, or endorsements.

- **Medical History Data**, including any past or current, chronic or mild, illnesses.
- **Job History Data**, including previous job history and past employer references.

4. How we collect personal data

We may obtain candidate information from any number of locations:

- When you register with our website or apply for jobs via our website
- When you correspond with us by phone, email or otherwise
- When you visit our website
- When you register your CV on a job board, and it matches the skills we're looking for
- When you apply for one of our jobs via a job board
- When you are referred by a friend / colleague
- Your online profiles
- Social Media

There are two main ways in which we collect client data:

- Directly from you
- From third parties such as candidates, online job boards, LinkedIn and networking.

5. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Candidates; We use your personal data to match your skills and experience with a potential employer. We will initially collect basic information on you such as contact details, job role and experience and then pass this on to the client in search of personnel. If you are chosen by the client and go through to the next stage, we will then be collecting more information from you at the interview (or equivalent) stage and onwards in that manner. We may use your data to send you information that you may find interesting such as suggesting other jobs to you.

Clients; We use your personal data to ensure that we can find the right candidates for the opportunities that you may have or for contractual obligations.

Suppliers; We use your personal data to ensure that we can contact you and for contractual obligations.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data.

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. How long do we keep your personal data for?

We will only retain your information for as long as is necessary for us to use your information as described above or to comply with our legal obligations. However, we may retain some of your information after you cease to use our services, if we believe in good faith that it is necessary to meet our legal obligations, such as retaining the information for tax and accounting

purposes.

When determining the relevant retention periods, we will take into account factors including:

- (a) our contractual obligations and rights in relation to the information involved;
- (b) legal obligation(s) under applicable law to retain data for a certain period of time;
- (c) statute of limitations under applicable law(s);
- (d) (potential) disputes;
- (e) if you have made a request to have your information deleted; and
- (f) guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

7. Sensitive personal data

We do not intend to collect any “special categories of personal data” (such as information which reveals your political, religious or philosophical beliefs, sexual orientation, race or ethnic origin or information relating to your health). However, to the extent that you do provide us with any special categories of data, we will only use that data for the purposes of our relationship with you and providing our recruitment services to you. This may be for one or more of the following reasons:

- with your explicit consent (in limited circumstances);
- where we need to carry out our legal obligations or exercise rights in connection with employment;
- where the processing is necessary for the purposes of preventive or occupational medicine or for assessing your working capacity;
- where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.

8. If you fail to provide personal data

Where we need to collect personal data by law or in order to perform a contract to which you are a party, and you fail to provide that data when requested, we may not be able to perform the contract. In this case, we may have to cancel the contract, but we will notify you if this is the case at the time.

9. Disclosures of your personal data

We may share personal data with hirers or other third parties in connection with the provision of our recruitment services. We may also disclose personal data to:

- third party service providers who process data on our behalf, such as:
 - outsourced payroll services;
 - IT support;
- professional advisers including lawyers, bankers, auditors and insurers for the purpose of providing consultancy, banking, legal, insurance and accounting services to us;
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances;
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all our data processors to respect the security of your personal data and to treat it in accordance with the law. We do not allow our data processors to use your personal data for their

own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

10. Where we store your data?

Your personal data is stored on a secure database, in spreadsheets (excel) and in email systems (outlook) all of which is on secure, password protected PC's and/or in hard copy within a locked facility and only accessed by Willow Recruitment (London) Ltd employees.

If you have subscribed to our newsletter (verbal or written opt-in required) then your name, and email address will be stored in our system.

11. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

12. Data security

We have put in place security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

13. Data retention

We will only retain your personal data, including identity data, contact data, worker status data, criminal record data, medical history data, and job history data, for a period of five years to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. For accounting purposes, your identity, payroll and PAYE data will be retained indefinitely since payroll data cannot be deleted.

14. Your rights in respect of your personal data

You have certain rights in respect of the personal data that we process about you (where we determine the purpose and means for which that personal data shall be processed):

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to object to processing
- The right to lodge a complaint
- The right to withdraw consent

If you wish to exercise any of the rights set out above in respect of your personal data, please contact Jith on jith@willowrecruitment.co.uk or +442039001235.

15. Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

16. Changes to this privacy policy

We reserve the right to update this privacy policy at any time, and we will provide you with a new

privacy policy when we make any substantial changes. We may also notify you in other ways from time to time about the processing of your personal data.

Marketing Consent:

From time to time we would like to send you details of reports, promotions, offers, networking and client events and general information about the industry sectors which we think might be of interest to you. If you consent to us contacting you for marketing purposes, please contact us on info@willowrecruitment.co.uk or 020390001235.

How will we contact you?

We may contact you by phone, email or social media. If you prefer a particular contact means over another please just let us know.

How can you contact us?

If you are unhappy with how we've handled your informed, or have further questions on the processing of your personal data, contact here:

Jith Kumar – jith@willowrecruitment.co.uk