

We're committed to protecting and respecting your privacy. This Privacy Notice informs you how we process the personal information (known as personal data) that we collect from you.

Starting Point Recruitment registered at 139-145 Lichfield Street, Walsall, West Midlands, WS1 1SE will be what's known as the "Controller" of the Personal Data you provide to us either directly by you or through a third party

How will my Personal Data be used?

The data we hold, and process will be used for our management and administrative use only.

We will keep and use it to enable us to register you as a candidate, offer you 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. We may also use your information during internal audits to demonstrate our compliance with certain industry standards.

We will keep and use it to manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, during your employment, at the time when your employment ends and after you have left.

What type of Personal Data will be collected?

(Please note that the list below of categories of personal data we may collect is not exhaustive)

- Personal identification information, such as your name, home address, date of birth, gender, work-related photographs, telephone number and National Insurance number
- Immigration, right-to-work and residence status
- Time and attendance data (utilising facial, fingers print recognition biometric data) – where applicable
- Family and emergency contact details.
- Job related information, such as years of service, work location, work record – references
- Educational and training information, such as your educational awards, certificates and licenses, and in-house training attendance
- Recruitment and performance-related data, such as objectives, ratings, comments, feedback results, career history, work equipment, career and succession planning, skills and competencies and other work-related qualifications
- CCTV footage and other information obtained through electronic means such swipe-card records – where applicable
- Information needed for compliance and risk management, such as disciplinary records, background check reports and security data
- Payroll and payment or benefits-related information, such as salary and insurance information, dependents, government identifier or tax numbers, bank account details, and employment related benefits information
- Your driving licence
- Disclosure Barring Services (DBS) checks Information on your interests and needs regarding future employment

What is our legal basis for processing your Personal Data?

1. For the purpose of carrying out the employment contract or to take steps to enter into an employment contract.
2. to comply with our legal obligations; and/or,
3. for the purposes of our "legitimate interests" {except where such interests are overridden by your interests, rights or freedoms}.

Our "legitimate interests" for these purposes are the need to:

1. transfer your data intra-group for administrative purposes.
2. process your data for the purposes of ensuring network and information security; and,
3. protect our legal position in the event of legal proceedings.

What type of 'Special' Personal Data will be collected?

- Your Nationality and Ethnic origin
- Details regarding your health
- We may also collect details of criminal convictions if this is relevant for a role that you are interested in applying for

This information is collected either to comply with our obligations under employment law; or, where this does not apply, we will request your explicit consent.

Will information be collected from other sources?

The Company collects, uses and processes a range of personal information about you during the recruitment process. We may obtain data about you indirectly from other sources such as your referees, job board websites and personal recommendations. This may include (as applicable):

- personal information included in a CV, any application form, cover letter or interview notes
- references
- information about your right to work in the UK and copies of proof of right to work documentation
- copies of qualification certificates
- other background check documentation
- details of your skills, qualifications, experience and work history with previous employers
- information about your current salary level, including benefits and pension entitlements
- your professional memberships

Who will process my Personal Data?

Your personal data will be processed by our staff in the UK and for IT hosting and maintenance purposes, our 3rd party Contractors based within the European Union.

Where will my Personal Data be stored?

Your Data is stored on our servers within the European Union, paper files locally and on 3rd party servers for the performance and compliance obligations of any contract we enter into with them or you.

Who will you share my data with?

We will share your personal data with our clients. This is fundamental and essential to:

- Introduce you to our client contacts for temporary assignments and permanent employment.
- enable our clients to observe their obligations where your personal data is necessary for your assignment (for example, for driving assignments we will share your driving licence); and,
- to enable our clients to audit our processes and compliance with our legal obligations in relation to supplying temporary labour.

We may also share your personal data that is necessary with:

- Our legal and professional advisors.
- master and neutral vendors or umbrella Companies for payroll purposes.
- 3rd parties for referencing purposes.
- Suppliers, Customers and partnering Employment Businesses for the performance and compliance obligations of any contract we enter into with them or you.
- our client's supply chain auditors
- our benefit providers; and,
- statutory authorities such as HMRC.

No third parties shall have access to your personal data unless the law allows them to do so or it is necessary in order to offer you work-finding services or for the performance of your employment contract. In this case, only the personal data that is relevant and necessary shall be shared/transferred.

We do not envisage that your data would be transferred outside the EU. If we perceive the need to do that, we would discuss that with you and explain the legal basis for the transfer of the data at that stage.

Do I have to provide you with my Personal Data?

No, there is no requirement for you to provide your personal data to us, but, if you do not provide at least that data that is necessary for us to assess your suitability for employment, enable us to introduce you to our clients and then to conduct the employment relationship, then it will not practically be possible for us to employ you.

How long will my Personal Data be kept?

We will keep your Personal Data for no longer than is legally required and strictly necessary, having regard to the original purpose for which the data was processed.

We will retain your contact details for a period of two years after your last assignment to continue to offer you work finding services. If you no longer wish to be contacted for work during this period, you can let us know by contacting your local representative or via email to enquiries@startingpointrecruitment.co.uk

What are my rights?

You have the right to request:

Be Forgotten:	request that your personal data is deleted
Data Portability	for data held on you to be transmitted to a third party
Withdrawn Consent:	where we process your personal data based on your consent, you have the right to withdraw that consent at any time
Object to Processing:	where we process your personal data for the performance of a legal task or in view of our legitimate interests you have the right to object on "grounds relating to your particular situation"
Subject Access:	to access information, we hold about you. This is sometimes referred to as making a "subject access request"
Rectification:	request your data is rectified if you consider any information, we hold about you is incorrect
Restrict Processing:	request your data is rectified if you consider any information, we hold about you is incorrect such as where you have contested the accuracy of the personal data, we hold on you, you have the right to block or suppress the further processing of your personal data

We do not undertake automated decision making or profiling.

You also have a specific right to lodge a complaint with the Information Commissioner's Office.

Contact

Should you have any questions, comments or wish to exercise your rights in relation to your Personal Data, please contact enquiries@startingpointrecruitment.co.uk

Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on SPR website, and where appropriate, we'll notify you verbally. Please check back frequently to see any updates or changes to our privacy notice.