



## HUNTLEY SPENCE DATA PROTECTION POLICY

### Introduction

Huntley Spence is an Employment Agency, as defined in the Employment Agencies and Employment Business Regulations 2003. We help candidates find jobs with new employers, typically known as 'permanent recruitment'. We are not an Employment Business or 'temping agency'. We take the protection of our candidates' and our clients' personal data very seriously and want to be transparent about when we collect it, how and why we use it, and how we safeguard it.

### Our right to process data

We have a legal right to process personal data for the purpose of carrying out our business, i.e. we need to process it in the course of providing recruitment services to our candidates and clients.

### The data controller

The 'data controller' is Huntley Spence Limited, a company registered in the United Kingdom, company registration no. 07042927, registered address: Suite 14, Cromwell Business Centre, Fairfax House, Cromwell Park, Banbury Road, Chipping Norton, OX7 5SR. The company's Data Protection Officer is currently the company's Director, Edward Jones.

### When we collect your data

We collect personal data in a number of instances, typically:

- When candidates make contact with us by email or phone
- When candidates send us a CV
- Through connecting with and corresponding with candidates on LinkedIn
- When holding discussions with candidates and clients by phone or in person
- When clients send us information about their business and their roles
- From firm websites and publicly available registers such as the UKIPO and EPO registers of qualified patent and trade mark attorneys or The Law Society register
- From financial and business information freely available on Companies House.

Note our website is not an 'interactive' website and we do not collect any personal data through it such as contact details or CVs; nor do we typically use job boards or commercial CV databases to obtain candidate contact details or CVs.

### How we store it

All contact details and email correspondence are stored in a private Huntley Spence Microsoft Office 365 account, which is backed up by Microsoft. This information is also synched across any Huntley Spence work devices such as laptops and mobile phones.



Any CVs and notes containing personal information on candidates, or containing business information on clients and their roles, are stored in a private Huntley Spence Apple iCloud Drive folder and iCloud account, which is backed up by Apple.

### **How and why we use it**

We use this personal data solely for the purpose of carrying out our business, as it allows us to:

- communicate effectively with candidates and clients over job opportunities
- introduce candidates to clients and exchange contact details
- send CVs and other relevant personal information about candidates to clients
- send information about a client's business or roles to candidates
- facilitate and oversee an interview/offer process
- obtain references and other professional advice from candidates and clients
- invoice our clients following placement and collect payment
- stay in touch with both sides in order to maintain a long-term professional relationship
- communicate effectively with our accountants and lawyers.

Note we don't as a business typically use personal data to send out any direct marketing; nor do we share it with any third parties other than our accountants and lawyers.

### **Consent**

We will always obtain a candidate's consent before introducing them to a client, sending their CV or personal data or revealing their identity in any way to a client. This will normally be obtained on email (and the email exchange stored) but if it is obtained in a phone call a note will be made in the candidate's 'Notes' document stored in our Huntley Spence iCloud Drive folder. Where a candidate wants us to discuss their suitability for a role with a client without revealing their identity initially, then we will always do that anonymously.

We have client and candidate terms of engagement that we send to clients and candidates early on at the start of any formal professional relationship, and these briefly set out how we will handle their personal data and also draw attention to this data protection policy, which is available on the company's website.

### **How we safeguard your data**

Our Huntley Spence Microsoft and Apple accounts are password protected, as are all employee devices, including laptops and mobile phones.

Although data sent and stored using the Internet always carries an inherent risk with it, we trust in Microsoft and Apple as two of the largest software providers in the world being able to offer a high level of security for the personal data that we hold.



We do not store personal data in electronic form in any locations other than those described above. We operate a largely 'paperless' business, meaning correspondence is not typically printed out, and we also shred any 'hard copies' of CVs and documents containing personal data before disposing of them.

### **Data breaches**

If we become aware of a data breach, we will immediately take all reasonable steps to rectify the breach, alert the relevant software providers, and ensure that the data is protected going forward, for example by changing passwords or accounts, and reviewing the security measures that we currently have in place.

### **How long we keep your data for and why**

Unless a candidate (or client) requests otherwise, we will keep their personal data indefinitely while the company continues to trade and a candidate's career is ongoing. This is because we may need to legitimately use it or communicate with a candidate or a client for the purpose of carrying out our business at any point in a candidate's career, and sometimes beyond. Where a candidate retires or our professional relationship with a candidate or client largely ceases to exist, we will normally delete any personal data within two years.

### **Your right to review, correct and request deletion of your data**

If you would like to review what personal data we hold on you, correct it in any way, or request that we delete all or some of it, please contact the company's Data Protection Officer, Edward Jones, at [info@huntleyspence.co.uk](mailto:info@huntleyspence.co.uk) and we will endeavour to comply with that request, provide the data requested and/or confirm that it has been corrected or deleted within 10 working days or as soon as practically possible thereafter.

### **Complaints**

If you have any complaints about our handling of your data, we hope you would address your complaint initially to our Data Protection Officer, Edward Jones, who will try to put things right. If you are still not satisfied, however, you have the right to complain to the Information Commissioner's Office.