

Bailey Employment Services Limited (“Bailey Employment”, “we” or “us”) is committed to protecting and respecting your privacy.

This privacy notice (together with other documents referred to herein) describes what personal information we collect from you and how we process your personal information when you use the baileyemploy website (“website”).

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## Personal data we may collect from you

- We may collect personal data on your visits to our website including, but not limited to, your IP address, browser, timestamp, content from surveys and contact forms and other communication data and the resources that you access. Our collection of this personal information will make your visit to the website easier in the future as we will be able to suggest content that is relevant to you based on the location you access the website from, what content you access and how you interact with it;
- We may also collect information for marketing purposes and analysis, including information on how you respond to email, SMS or text message, phone and other marketing campaigns;
- We will collect any information you provide to us when you use our contact forms (The provision of your personal information via our contact forms is not a statutory or contractual requirement; however, please note that fields marked with an asterisk (\*) are mandatory fields, because we need this information to comply with or respond to your request, or to improve your future experiences with us and our website. Other information or personal information you share with us when completing our contact forms is at your sole discretion. If you contact us, we will keep a record of that correspondence;
- Fields we may request include but are not limited to: your first name, last name, company name, job title, business email address, telephone number, number of permanent employees, job function, job level, industry, your location,
- We may use your personal information to send you direct marketing via email and other communication means when you opt-in for this purpose in the relevant contact form. You may opt-out of receiving future marketing communications at any time by emailing:- [dataprotection@swsgroup.co.uk](mailto:dataprotection@swsgroup.co.uk)
- Use of Cookies: 'Cookies' are ways of saving a small amount of personal information. We only use them to save your username or password to allow easy access to our site. We advise you not to use 'cookies' if your computer is shared by other people.

# Who are we and what we do

We are a recruitment agencies as defined in the Employment Agencies and Employment Businesses Regulations 2003. We collect the personal data of the following types of people to allow us to undertake our business:

- Prospective and placed candidates for permanent or temporary roles;
- Prospective and live client contacts;
- Supplier contacts to support our services, including agency contacts;
- Employees, consultants, temporary workers.

## How we obtain your personal data

### **A) Information you give us or we may collect from you**

We may collect information about you when you fill in forms on a group company website, for example [www.baileyemploy.co.uk](http://www.baileyemploy.co.uk) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, to enter our database, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our site or enter a competition, promotion or survey.

The information you give us or we collect about you may include:

- information contained in your CV or job application such as your name, address, private and corporate e-mail address and phone number;
- information contained in any documents that you send to any of us for identity verification purposes such as your passport or driving licence;
- financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom,
- links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, Facebook or corporate website,
- information that you provide about yourself when negotiating or entering into a contract with us.

### **B) Information we collect about you when you visit our websites**

With regard to each of your visits to our websites, for example, [www.baileyemploy.co.uk](http://www.baileyemploy.co.uk), we will collect the following information:

- information that you provide by filling in forms on any of our websites. This includes information provided to us at the time of registering to use any of our websites (where applicable), subscribing to any of our services (where applicable), personalising any of our websites with your preferences or requesting further services;
- technical information relating to your visits including, but not limited to, traffic data, location data, weblogs, other communication data and the resources that you access;
- information when you respond to a survey and/or when you report a problem with one any of our websites.

### **C) Information we obtain from other sources**

This is information that we obtained about you from other sources such as LinkedIn, corporate websites, job boards, online CV libraries, your business card and personal recommendations. In this case, we will refer you to this Privacy Notice within a maximum of 30 days of collecting the

data of the fact that we hold personal data about you, the source of the personal data and whether it comes from publicly available sources, and for what purpose we intend to retain and process your personal data.

We work closely with other third parties including other group companies, our clients, other employment agencies who may be acting on your behalf, your previous employer or organisation that you worked for, credit reference agencies, organisations who process criminal checks (with your prior consent), DVLA and any other pre-engagement or pre-employment screening providers specifically required by our clients. We may receive information about you from them for the purposes of our recruitment services, pre-employment or pre-engagement screening services and other ancillary support services.

## **D) Special categories of data**

### **(i) Diversity**

If requested to do so by a client, or it is a requirement of our contract with a client, we may ask you for some ethnicity and diversity information to support the client's equal opportunities monitoring. This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background. Any information that is disclosed to the client will be anonymised where relevant.

As this information is 'sensitive' personal information we need to obtain your explicit consent before we can use it. We will therefore ask for your consent prior to asking you to complete the questionnaire. Answering the questions is entirely voluntary.

### **(ii) Criminal convictions**

If a client requests us to obtain a criminal convictions check as part of their pre-employment or pre-engagement screening process, we will contact you first to explain the process and obtain your explicit consent to proceed.

## **How we use your personal data**

Your personal data will be collected and handled by us for the following purposes:

- to provide you with the services you expect us to;
- to best tailor content and resources according to your preferences;
- to respond to your request or questions when you contact us;
- with your consent we may also use your contact data for direct marketing to inform you about services/products/events etc that might be of interest to you (we will communicate by email, telephone, mail and/or other communication methods);
- to send to you other information – such as Bailey Employment upcoming events or newsletters – that may be of interest to you;
- to help us create, publish, and improve content most relevant to you;
- to ensure that the content provided through the website is presented in the most effective manner for you and for your device;
- to allow you to participate in interactive features of our website, when you choose to do so;
- to further develop and improve the website and systems to better serve you. This mainly takes place in the context of new IT systems and processes so that information about you may be used in the testing of those new IT systems and processes where dummy data cannot fully replicate the operation of the new IT system;
- to perform analytical research on our prospective client and candidate base, including the content, and the services/products they are interested in;
- to transfer data to third parties (see below);
- where necessary, to comply with any legal obligation; and

- we may also process your information to:
  - a. investigate or respond to incidents and complaints;
  - b. comply with obligations and rights and cooperate with investigations carried out by the police, government or regulators.

## What does the law say about this

Our use of your information as described above is permitted by applicable data protection law because it is:

- necessary for our legitimate interests in pursuing the purposes set out above, and such interests in each case not being overridden by your privacy interests;
- in some cases, necessary to meet our legal or regulatory responsibilities, such as disclosures to authorities, regulators or government bodies; or
- in some cases, necessary for the performance of a task carried out in the public interest and, when we use special categories of personal information, necessary for establishing, exercising or defending legal claims or where the processing relates to personal information manifestly in the public domain;
- in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you opt-in to receive marketing communications and news, via email and other communication means.

## Do we process data about you without any human intervention at all?

Yes, at times we may use automated systems/processes and automated decision-making (like profiling) to ensure we give you the best possible service.

## How long do you keep my personal data for?

We will keep your information for as long as you wish to receive our communications and thereafter for the longer of the period required in order to meet our business, legal or regulatory responsibilities. As a general rule, if you are a candidate, your information will be held for as long as you are actively engaging with us in order to receive work finding services.

If you cease to actively engage with us:

- if you are a candidate seeking a permanent or fixed term engagement we will retain your personal data for two (2) years after the date we last had meaningful contact with you;
- if you are a candidate seeking a temporary assignment or a contracting role we will retain your personal data for two (2) years after date we last had meaningful contact with you (or, where appropriate the company you are working for or with);
- if you are a contractor or temporary worker and have performed an assignment we will retain details of your assignment for six (6) years after the end date of your assignment in order to comply with applicable accounting and tax laws and to assist in the event of HMRC raising any queries regarding your tax status.

## Sharing with third parties

To facilitate our efficient use of your information, and to provide you with content and/or resources, or to fulfil a request you make of us, we disclose your information to third parties. However, this disclosure will only occur in the following circumstances:

- To suppliers, contractors and intermediaries: from time to time we may engage or employ other companies and individuals to perform functions on our behalf. Examples include the hosting and/or maintaining of website content, or the provision of certain features contained on the website, and the provision of marketing services;
- Such recipients will only have access to your personal information as required by them to perform their functions and are not permitted to use such personal information for any other purposes. These recipients will be subject to contractual confidentiality obligations;
- To other entities belonging to the SWS Group (i.e. any companies directly or indirectly controlled by the SWS Group). We share your data with them so that we can better serve you or, simply, to fulfil your requests (e.g. when you use contact us forms);
- To government or law enforcement authorities if we determine in our sole discretion that we are under a legal obligation to do so.

## IP addresses and cookies

We collect information about your computer, including (where available) your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns, and we will not use it in isolation to identify you or any individual. If you provide us with personal data, such as your name, we will then match your IP address and browsing history (for example) with that personal data.

For the same reason, we may obtain information about your general Internet usage by using a cookie file which is stored on your device. Cookies help us to improve the website and to deliver better and more personalised content.

If your computer is shared with other people, we advise that you do not select the 'remember my details' option when that option is offered by the website.

## Where your personal data is stored and processed

As explained in the "Sharing with third parties" paragraph above, we share your personal information with the following:

- Third party suppliers, contractors or agents: where we use a third-party supplier, contractor or agent, your personal information remains under our control and we have controls in place to ensure your personal information is adequately protected.
- Other companies in the SWS Group: we have entered into a groupwide arrangement to ensure your personal information continues to be subject to an adequate level of protection.

We endeavour to take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this policy.

# Do we transfer your data outside the European Union?

Your personal information can be transferred and processed in one or more other countries, in or outside the European Union. We shall only transfer your data outside the EU to countries which the European Commission believes offers an adequate level of protection to you, or where Bailey Employment Services has put in place appropriate safeguards to seek to preserve the privacy of your information.

## Data security

Although we will do our best to protect your personal information, you should be aware that the transmission of information via the Internet is not completely secure and we cannot guarantee the security of your personal information transmitted to the website or any third party; for this reason, any transmission is at your own risk. We will use strict operational procedures and adequate, technical and organisational security measures to prevent any unauthorised access, change, deletion or transmission of this personal information.

## Your rights. How you can access, correct and delete your personal data

You have the right to ask us not to process your personal information for marketing purposes. We will usually inform you (before collecting your information) if we wish to use your information for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect your express consent from you if legally required prior to using your personal data for marketing purposes.

You can exercise your right to accept or prevent such processing by checking certain boxes on the forms we use to collect your information.

Our websites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

The GDPR provides you with the following rights. To:

- Request correction of 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 removed personal information where there is no good reason for us continuing 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 restrictions 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 in certain formats, if practicable.

- Make a complaint to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted at: <https://ico.org.uk/concerns/>

To exercise your rights, you can contact us at the following address: [dataprotection@swsgroup.co.uk](mailto:dataprotection@swsgroup.co.uk)

To the extent our processing of your personal information is based on your consent, you also have the right to withdraw your consent at any time. Withdrawal of your consent will not affect the lawfulness of any processing based on your consent before the receipt of such withdrawal.

## Marketing communications

We will only send marketing communications to you via email or other communication means where you have consented that we may do so. We will usually offer you a check box on the forms we use to collect your personal information where, if you agree to receive marketing communications, you have to click the box. Where we send marketing communications to you via email, you may opt out of receiving any further marketing communications by clicking the 'unsubscribe' or 'opt-out' function in the email.

In addition, you can also exercise your opt-out right at any time by contacting us at [dataprotection@swsgroup.co.uk](mailto:dataprotection@swsgroup.co.uk) and providing the following information: your name, your email address, a contact telephone number, the marketing communications you would like to opt out of receiving.

## Changes to this policy

The terms of this policy may change from time to time. We shall publish any material changes to this policy through appropriate notices either on this website or contacting you using other communication channels.

## Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [dataprotection@swsgroup.co.uk](mailto:dataprotection@swsgroup.co.uk)

You can request a copy of mechanisms relating to a specific transfer of your personal information by contacting [dataprotection@swsgroup.co.uk](mailto:dataprotection@swsgroup.co.uk)

You can also contact our data protection representative at the following address: [dataprotection@swsgroup.co.uk](mailto:dataprotection@swsgroup.co.uk)