

Company Name:	St David Recruitment Services ('the Company')
Company Contact details:	St David Recruitment Services 790 Newport Road, Cardiff. CF3 4FH 02920 797920
Document DP5A	Privacy Notice (when personal data is obtained from the data subject)
Topic:	Data Protection
Date:	Friday 25 th May, 2018

The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. The legal bases we rely upon to offer these services to you are:

- **Consent** of the individual for one or more specific purposes.
- **Legitimate interest;** *processing is necessary for the purposes of legitimate interests pursued by the controller or a third party*
- **Legal obligation;** *processing is necessary for compliance with a legal obligation that the controller is subject to.*
- **Contractual obligation;** *processing is necessary for the performance of a contract.*

b. Legitimate interest

Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is as follows:

- The Company is a recruitment business which provides work-finding services to its clients and work-seekers.

c. Recipient/s of data

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Clients of St David Recruitment Services who have authorised us to source prospective candidates for permanent or temporary employment.
- For payroll purposes with HMRC

d. Statutory/contractual requirement

Your personal data is a contractual requirement and is necessary to enter into a contract. You are obliged to provide the personal data. If you do not the consequences is that we will be unable to represent you as a candidate for employment.

2. Data retention

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time.

The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

Where the Company has obtained your consent to process your personal/sensitive personal data we will do so in line with our retention policy detailed in the table below. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal data / sensitive personal data.

Work-seeker records	1 year from date of last supply
Hirer records	1 year from date of last supply
TWA for temporary candidates	6 years
TOBs for clients	6 years
Working time records	2 years (from creation date)
References	1 year (or as long as is necessary)
Right to work in UK records	2 years (after employment or engagement has ended)

3. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal /sensitive personal data you have the right to withdraw that consent at any time by contacting the Recruitment Consultant with whom you initiated contact, or any other employee at St David Recruitment Services.

4. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact Sarah Learney, Recruitment Manager on 02920 797920 / sarah@stdavid-recruitment.co.uk

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.