

Peppermint Recruitment Limited

Privacy Notice

1. General

- 1.1 Peppermint Recruitment Limited (“we”, “us” or “Peppermint”) take the privacy of your information very seriously. Our Privacy Notice is designed to tell you about our practices regarding the collection, use and disclosure of personal information which may be collected in person from you, obtained via our websites or collected through other means such as by an online form, email, or telephone communication.
- 1.2 This notice applies to personal information provided by our clients and suppliers about their employees and other individuals affiliated with them and also to candidates or prospective candidates (“Candidates”) for roles with our clients or prospective clients.
- 1.3 In this notice “you” refers to any individual whose personal data we hold or process (i.e: to you as candidate or potential candidate or as an employee or individual associated with our client or supplier).
- 1.4 In general, our services are related to the provision of recruitment services to clients and we do not process personal data on a large scale, but we will hold certain data in relation to Candidates and individuals affiliated with our clients and suppliers, and this notice sets out the basis on which we hold that data.
- 1.5 This notice is governed by the EU General Data Protection Regulation (the “GDPR”) from 25 May 2018.

2. Legal Basis on which we process personal data

- 2.1 Personal data we hold about you will be processed either because:
 - 2.1.1 the processing is necessary in order for us to comply with our obligations under a contract between you and us, specifically for the provision of our services; or
 - 2.1.2 the processing is necessary in pursuit of a “legitimate interest”, a legitimate interest in this context means a valid interest we have, or a third party has in processing your personal data which is not overridden by your interests in data privacy and security.

3. Personal data we collect

- 3.1 We may collect and process the following personal data (information that can be uniquely identified with you) about you:
- 3.1.1 for individuals associated with our clients we may hold contact information such as names, email addresses, phone numbers, addresses, and job titles and/or specific roles within your organisation (“Client Contact Information”);
 - 3.1.2 for individuals associated with our suppliers and other third parties we interact with we may hold contact information such as names, email addresses, phone numbers, addresses, and job titles and/or specific roles within your organisation (“Third Party Contact Information”);
 - 3.1.3 for Candidates we may have personal information about you, your background, work history etc. This information may include name, address, telephone number, email address, CV, work history, educational qualifications (“Candidate Information”)
 - 3.1.4 a record of any correspondence or communication between you and us (“Communication Information”);
 - 3.1.5 marketing information we may hold about you in order to provide information about our services this may include names, email addresses, phone numbers, addresses, and job titles and/or specific roles within your organisation (“Marketing Information”).
- 3.2 We will collect information either from you directly or from a third party (for instance your employer or an introducer). If you are a Candidate, we may research information on publicly available job boards and LinkedIn. If we do obtain your personal data from a third party your privacy rights under this notice are not affected and you are still able to exercise the rights contained within this notice.
- 3.3 You do not have to supply any personal information to us in practice we may be unable to provide our services to you without personal data (for instance we will need contact information in order to communicate with you). You may withdraw our authority to process your personal data (or request that we restrict our processing) at any time but there are circumstances in which we may need to continue to process personal data (please see below).

4. How we process your personal data

4.1 Please see the table below, which sets out the manner in which we will process the different types of personal data we hold:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
When we are setting up a retainer or engagement with a client or potential client with whom you are associated or entering into an agreement to provide services to our client.	Client Contact Information Communication Information	Performance of a contract Necessary for our legitimate interests (to establish necessary information about you in order to provide our services)
When we research, locate and record information relating to Candidates or potential Candidates.	Candidate Information	Necessary for our legitimate interests (in order to deliver our services).
When we provide information relating to Candidates or potential Candidates to our clients or potential clients.	Candidate Information	Necessary for our legitimate interests (in order to deliver our services).
When we communicate with you as an individual affiliated with our, client or potential client in order to provide our services to you.	Client Contact Information Communication Information	Performance of a contract Necessary for our legitimate interests (in order to deliver our services).
When we communicate with you as a Candidate in the context of a particular role	Candidate Information Communication Information	Performance of a contract Necessary for our legitimate interests (in order to deliver our services).

When we enter into an agreement with you or an organisation with which you are connected as a supplier.	Third Party Contact Information Communication Information.	Performance of a contract with you Necessary for our legitimate interests (in order to deliver our services).
When we communicate with you as an individual affiliated with our supplier or another third party we interact with.	Third Party Contact Information Communication Information	Performance of a contract with you Necessary for our legitimate interests (in order to deliver our services).
When we communicate with you, or you as an individual affiliated with our client, potential client about our services (for instance if you request support or make a complaint).	Client Contact Information Communication Information	Performance of a contract with you Necessary for our legitimate interests (for running our business and to provide you with our Service)
To manage our relationship with you.	Client Contact Information Communication Information	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests
To store your contact information for marketing purposes and sending marketing and other promotional communications to you.	Client Contact Information Candidate Information Marketing Information	Necessary for our legitimate interests in promoting our services to business clients. Consent, in the case of Candidates.

For each type of data listed above, definitions are included under clause 3.1.

5. Data Retention

5.1 Our current data retention policy is to delete or destroy (to the extent we are able to) the personal data we hold about you in accordance with the following:

<i>Category of personal data</i>	<i>Length of retention</i>
Records relevant for tax and customs authorities	8 years from the end of the year to which the records relate
Candidate Data	The later of 7 years from placing you as a Candidate or putting you forward as a Candidate for a given role with our client or 7 years from our last interaction with you.
Candidate Data (research)	2 years from collecting relevant data where you as a Candidate have been identified as a potential Candidate for a role but have not been put forward for a given role.
Personal data processed in relation to a contract between you and us	7 years from either the end of the contract or the date you last used our services , being the length of time following a breach of contract in which you are entitled to make a legal claim
Personal data held on marketing or business development records	3 years from the last date on which you have interacted with us

5.2 For any category of personal data not specifically defined in this notice, and unless otherwise specified by applicable law, the required retention period for any personal data will be deemed to be 7 years from the date of receipt by us of that data.

5.3 The retention periods stated in this notice can be prolonged or shortened as may be required (for example, in the event that legal proceedings apply to the data or if there is an on-going investigation into the data).

5.4 We review the personal data (and the categories of personal data) we are holding on a regular basis to ensure the data we are holding is still relevant to our business and is accurate. If we discover that certain data we are holding is no longer necessary or accurate, we will take reasonable steps to correct or delete this data as may be required.

5.5 If you wish to request that data we hold about you is amended or deleted, please refer to clause 8 below, which explains your privacy rights.

6. Sharing your information

- 6.1 We do not disclose any information you provide to any third parties other than as follows:
- 6.1.1 We will disclose Candidate Data to our clients or potential clients and our clients will be the data controller for that Candidate Data;
 - 6.1.2 if we are under a duty to disclose or share your personal data in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime);
 - 6.1.3 in order to enforce any terms and conditions or agreements for our services that may apply;
 - 6.1.4 If we are sub-contracting services to a third party, we may provide information to that third party in order to provide the relevant services;
 - 6.1.5 we may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, but we will take steps with the aim of ensuring that your privacy rights continue to be protected;
 - 6.1.6 to protect our rights, property and safety, or the rights, property and safety of our users or any other third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- 6.2 Other than as set out above, we shall not disclose any of your personal information unless you give us permission to do so. If we do supply your personal information to a third party, we will take steps to ensure that your privacy rights are protected, and that third party complies with the terms of this notice.

7. Security

- 7.1 We will take all reasonable steps to ensure that appropriate technical and organisational measures are carried out in order to safeguard the information we collect from you and protect against unlawful access and accidental loss or damage. These measures may include (as necessary):
- 7.1.1 protecting our servers with software firewalls;
 - 7.1.2 locating our data processing storage facilities in secure locations;
 - 7.1.3 encrypting all data stored on our server with an industry standard encryption method that encrypts the data between your computer and our server so that in the event of your network being insecure no data is passed in a format that could easily be deciphered;

7.1.4 when necessary, disposing of or deleting your data so it is done so securely;

7.1.5 regularly backing up and encrypting all data we hold.

7.2 We will ensure that our employees are aware of their privacy and data security obligations. We will take reasonable steps to ensure that the employees of third parties working on our behalf are aware of their privacy and data security obligations.

7.3 This notice and our procedures for handling personal data will be reviewed as necessary.

7.4 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Site; any transmission is at your own risk. Once we have received your information, we will use the strict procedures and security features referred to in this clause to try to prevent unauthorised access.

8. Your privacy rights

8.1 The GDPR gives you the following rights in respect of personal data we hold about you:

<i>The right to be informed</i>	You have a right to know about our personal data protection and data processing activities, details of which are contained in this notice.
<i>The right of access</i>	You can make what is known as a Subject Access Request (“SAR”) to request information about the personal data we hold about you (free of charge, save for reasonable expenses for repeat requests). If you wish to make a SAR, please contact us as described below.
<i>The right to correction</i>	Please inform us if information we hold about you is incomplete or inaccurate in any way and we will update our records as soon as possible, but in any event within one month. We will take reasonable steps to communicate the change to any third parties to whom we have passed the same information.
<i>The right to erasure (the ‘right to be forgotten’)</i>	Please notify us if you no longer wish us to hold personal data about you (although in practice it is not possible to provide our services without holding your personal data and we may need to keep your data in some circumstances). Unless we have reasonable grounds to refuse the erasure, on receipt of such a

	<p>request we will securely delete the personal data in question within one month. The data may continue to exist in certain backup, but we will take steps to ensure that it will not be accessible.</p> <p>We will communicate the erasure to any third parties to whom we have passed the same information.</p>
<i>The right to restrict processing</i>	You can request that we no longer process your personal data in certain ways, whilst not requiring us to delete the same data. However again, some of our Services will not be available if processing is restricted.
<i>The right to data portability</i>	You have right to receive copies of personal data we hold about you in a commonly used and easily storable format (please let us know a format which suits you). You may also request that we transfer your personal data directly to third party (where technically possible).
<i>The right to object</i>	Unless we have overriding legitimate grounds for such processing, you may object to us using your personal data for direct marketing purposes (including profiling) or for research or statistical purposes. Please notify your objection to us and we will gladly cease such processing.
<i>Right to withdraw consent</i>	If we are relying on your consent as the basis on which we are processing your personal data, you have the right to withdraw your consent at any time. Even if you have not expressly given your consent to our processing, you also have the right to object (see above).

8.2 All SARs and other requests or notifications in respect of your above rights must be sent to us in writing to Peppermint Recruitment Limited, c/o Melwoods, PO Box 1520, Hemel Hempstead, Herts HP1 9QN email: info@peppermintrecruitment.co.uk

8.3 We will endeavour to comply with such requests as soon as possible but in any event, we will comply within one month of receipt (unless a longer period of time to respond is reasonable by virtue of the complexity or number of your requests).

9. Data Breaches

9.1 If personal data we hold about you is subject to a breach or unauthorised disclosure or access, we will report this to the Information Commissioner's Office (ICO) and/or our data protection manager.

9.2 If a breach is likely to result in a risk to your data rights and freedoms, we will notify you as soon as possible.

10. Transferring your information outside Europe

10.1 As part of the services provided to our clients offered to you the information you provide to us may be transferred to, processed and stored at, countries or international organisations outside of the EEA.

10.2 Our client may be based outside of the EEA and we may transfer personal data to our client outside of the EEA. For instance, we may transfer Candidate Information to our client outside of the EEA where this is necessary to perform a contract between us and the client and this is in the interests of the Candidate.

10.3 If you contact us while you are outside the EEA, your information may be transferred outside the EEA in order to communicate with you.

10.4 If we transfer your information outside of the EEA other than in accordance with clauses 10.2 and 10.3 and the third country or international organisation in question has not been deemed by the EU Commission to have adequate data protection laws, we will provide appropriate safeguards and we will be responsible for ensuring your privacy rights continue to be protected as outlined in this notice.

11. Notification of changes to the contents of this notice

We will post details of any changes to our policy on [our website] to help ensure you are always aware of the information we collect, how we use it, and in what circumstances, if any, we share it with other parties.

12. Contact us

If at any time you would like to contact us with your views about our privacy practices, or with any enquiry or complaint relating to your personal information or how it is handled, you can do so via the following address: Peppermint Recruitment Limited, c/o Melwoods, PO Box 1520, Hemel Hempstead, Herts HP1 9QN email: info@peppermintrecruitment.co.uk

If we are unable to resolve any issues you may have, or you would like to make a further complaint, you can contact the Information Commissioner's Office by visiting <http://www.ico.org.uk/> for further assistance.