



# PRIVACY POLICY

## Who are we?

Broomham Recruitment will be what is known as the 'Controller' of the personal data you provide to us. We are a specialist estate agency and property sector recruitment company based at Mill Lane, Westbury, Buckinghamshire, NN13 5BF.

## Who does this Privacy Policy apply to?

This Privacy Policy applies to the personal data of our Website Users, Candidates, Clients, Suppliers, and other people whom we may contact in order to find out more about our Candidates.

It is important to point out that we may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.

If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these as well.

## What does this Policy cover?

We at Broomham Recruitment take your personal data seriously. This policy:

- sets out the types of personal data that we collect about you;
- explains how and why we collect and use your personal data;
- explains how long we keep your personal data for;
- explains when, why and with who we will share your personal data;

- sets out the legal basis we have for using your personal data;
- explains the effect of refusing to provide the personal data requested;
- explains the different rights and choices you have when it comes to your personal data; and
- explains how we may contact you and how you can contact us.

## What personal data do we collect about you?

**Candidates:** We collect and use only the information necessary to be able to find the best available opportunities and any further information needed to assess your eligibility through the different stages of recruitment. This information includes CVs, identification documents, educational records, work history, employment, references and financial information.

We may also collect sensitive personal data about you, related to your health, diversity information or details of any criminal convictions of. We only collect sensitive personal data from you, and further process this data, where you have given your explicit consent.

**Clients:** We collect and use only the information necessary to provide you, or people in your organisation with services such as finding the best available candidates for your opportunities.

**Other data subjects:** We collect and use only the information necessary to be able to contact you and pay you for the services you provide.

**Website Users:** We collect and use only the information necessary to improve your experience when using our website. This may include how, when and how often you visit us with reverse IP tracking.

## Where do we collect personal data about you from?

The following are the different sources we may collect personal data about you from:

- Directly from you. This is information you provide while searching for a new opportunity and/or during the different recruitment stages, or during the course of our work with you to ensure that our relationship runs efficiently.
- From an agent/third party acting on your behalf. e.g. A Contractor's Limited Company.
- Through publicly available sources. For example;
  - LinkedIn
  - Job Boards

- By Reference or word of mouth. For example, you may be recommended by a friend, a former employer, a former colleague or even a present employer.
- Social media accounts including, but not limited to Facebook, Instagram, Twitter.

## How do we use your personal data?

**Candidates:** We use your personal data to match your skills and experience with a potential employer. We will initially collect basic information on you such as contact details, job role and experience and then pass this on to the client in search of personnel. If you are chosen by the client and go through to the next stage we will then be collecting more information from you at the interview (or equivalent) stage and onwards in that manner. We may use your data to send you information that you may find interesting such as suggesting other jobs to you.

**Clients:** We use your personal data to ensure that we can find the right candidates for the opportunities that you may have or for contractual obligations.

**Suppliers:** We use your personal data to ensure that we can contact you and for contractual obligations.

## How long do we keep your personal data for?

We will only retain your information for as long as is necessary for us to use your information as described above or to comply with our legal obligations. However, we may retain some of your information after you cease to use our services, if we believe in good faith that it is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.

When determining the relevant retention periods, we will take into account factors including:

- (a) our contractual obligations and rights in relation to the information involved;
- (b) legal obligation(s) under applicable law to retain data for a certain period of time;
- (c) statute of limitations under applicable law(s);
- (d) (potential) disputes;
- (e) if you have made a request to have your information deleted; and
- (f) guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

## Who do we share your personal data with?

**Candidates:** We share your personal data with the client who has a position to fill, in order to determine with the client whether you are a good fit for the available position.

We may also conduct checks on you to verify the information you have provided.

**Clients:** We share your data with candidates during the course of providing recruitment services to you, and with third parties as part of our contractual relationship.

**Suppliers:** We share your data third parties as part of our contractual relationship.

## What legal basis do we have for using your information?

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on to you to fulfil our legal obligations.

We will, in some circumstances, rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate).

For prospective candidates, contractors, referees and clients, our processing is necessary for our legitimate interests - we need this information in order to be able to assess suitability for potential roles, to find potential candidates and to contact clients and referees, and suppliers.

If you are interviewed and submitted as a candidate, then this may involve the processing of more detailed personal data including sensitive data such as health information that you or others provide about you. In that case we always ask for your consent before undertaking such processing.

## Legitimate Interests

We take your privacy seriously and will only use your personal information to administer your account and to provide you with our recruitment services.

We think it's reasonable to expect that, if you are looking for employment or have posted your professional CV information on a job board or professional networking site, you are happy for us to collect and otherwise use your personal data to provide our recruitment services to you, share that information with prospective employers (with your consent) and assess your skills against our live vacancies. During the job offer process, your potential employer may also want to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with the law. We need to do these things so that we can help you find the job you deserve.

We want to provide you with tailored job alerts to help you on your job hunt. We therefore think it's reasonable for us to process your data to make sure that we send you the most appropriate jobs.

We may also need to use your data for our internal administrative activities, like payroll and invoicing where relevant.

## What happens if you do not provide us with the information we request or ask that we stop processing your information?

If you do not provide the personal data necessary, or withdraw your consent for the processing of your personal data, we may not be able to match you with available job opportunities.

## Do we make automated decisions concerning you?

We may make automated decisions about you during the assessment stage of the recruitment process. We put assessment candidates through a structured screening process to assess whether each candidate meets the specific criteria for a particular position. These assessments may be fully automated e.g. online pre-screening tests. As these assessments may result in a candidate being deemed not suitable for a position by means of a solely automated assessment, we only undertake this activity with the candidate's explicit consent. We also carry out personality profiling on candidates with the candidate's consent.

## Do we transfer your data outside the EEA?

No, we do not transfer personal data out of the EEA.

## How do we safeguard your personal data?

We take the security of your data very seriously and have put in place appropriate measures that are designed to prevent unauthorised access to or misuse of your personal data.

## What rights do you have in relation to the data we hold on you?

By law, you have a number of rights when it comes to your personal data. Further information and advice about your rights can be obtained from the data protection regulator in your country.

### **1. The right to be informed**

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Policy.

### **2. The right of access**

You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy). This is so you're aware and can check that we're using your information in accordance with data protection law.

### **3. The right to rectification**

You are entitled to have your information corrected if it's inaccurate or incomplete.

### **4. The right to erasure**

This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.

### **5. The right to restrict processing**

You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.

## **6. The right to data portability**

You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.

## **7. The right to object to processing**

You have the right to object to certain types of processing, including processing for direct marketing.

## **8. The right to lodge a complaint**

You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.

## **9. The right to withdraw consent**

If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

## **How will we contact you?**

We may contact you by phone, email, social media or messaging apps such as WhatsApp. If you prefer a particular contact means over another please just let us know.

## How can you contact us?

If you are unhappy with how we've handled your information, or have further questions on the processing of your personal data, contact here:

[nicola@broomhamrecruitment.com](mailto:nicola@broomhamrecruitment.com)