

Leadenhall Search and Selection Ltd

Privacy Notice

Who we are:

Leadenhall Search and Selection Ltd (“the Company”) is a recruitment business registered in England, Company number: 09456233.

Registered address: D N S House, 382 Kenton Road, Harrow, Middlesex, United Kingdom, HA3 8DP.

Operating address: 20 St Thomas Street, London SE1 9RS.

The Company provides work-finding services to Candidates and Clients. In order to carry out these services the Company must process personal data, and in doing so the Company act as a data controller. We may receive your personal data directly, such as through an application or registration form, CV, via our website, or we may collect them from another third party source, such as a job board or LinkedIn. In order to collect your personal information, the Company must have a legal basis for processing your personal data. We will only use your personal data in accordance with the terms of this notice, and for the purpose of carrying out work-finding services and/ or information relating to roles relevant to you.

This notice explains how we use your personal data; how it is collected; how it is held; and how it is processed. It also explains your rights under the law relating to your personal data.

What is personal data?

The UK Data Protection Act 2018 defines “personal data” as ‘any information relation to an identified or identifiable living individual’. In simpler terms, this is any information about you, that enables you to be identified.

What are my rights?

Under Data Protection Legislation, you have the following rights:

- a) The right to be informed about our collection and use of your personal data.
- b) The right to access the personal data we hold about you.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- d) The right to be forgotten (this means the right to ask us to delete or otherwise dispose of any of your personal data that we hold).
- e) The right to restrict (prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any given time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using

automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way, but third parties and Clients that we work with might.

It is important that the personal data we hold about you is kept up to date and accurate. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

You can find further information about your rights on the Information Commissioners Office (“ICO”) website.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the ICO. We would welcome the opportunity to resolve your concerns ourselves, so please contact us first.

What personal data do we collect and how?

Candidates

We may collect some or all of the following personal data in order to enable us to offer you employment opportunities that are best tailored to you. Where applicable law applies, we will not process your data in those jurisdictions:

- Name
- Age/ date of birth
- Sex/ gender
- Photograph
- Marital status
- Contact details
- Education details
- Employment history
- Emergency contacts and details of any dependents
- Referee details
- Immigration status (whether you need a work permit or sponsorship from employers)
- Nationality/ citizenship
- A copy of your ID
- Financial information
- Diversity information
- Details of any criminal convictions if this is required for a role that you are interested in
- Details of your current remuneration, pensions and benefits arrangements
- Information on your interests and needs regarding future employment
- Any additional information you choose to provide us with
- Any additional information given to us by your referees
- Any additional information that our clients may tell us about you, or through other third-party sources such as job sites

If you have any concerns about the type of data we might hold about you, please contact us.

Clients

We collect limited personal data from our clients and generally only need the contact details of a few individuals in order to provide our services to you as a Client.

The information we collect includes:

- Names of people within your organisation
- Contact details of people within your organisation

We collect this information for the sole purpose of providing our services and ensuring that we can find Candidates who are the right fit for your business.

We also collect information regarding your engagement with our Candidate profiles.

We may hold extra information that someone within your organisation has chosen to give us.

If you would like more information about the type of data we hold about you, please contact us.

Suppliers

We only need contact details of relevant individuals within your organisation for the purpose of communication. We also need other information, such as your bank details, for the purpose of paying for the services you provide to us.

People whose data we receive from a third party

Occasionally, we might receive your personal data through a third party, such as a referral from a Candidate. If we are given your details, we will only ever collect very basic information, such as your contact details, in order to get in touch with you.

All personal data that we collect is given to us in two main ways: either directly from you; or through a third party, such as a job board.

Directly from you

We might receive your personal data directly from you if you have entered your details on our website, or as part of an application form; if you have emailed us a copy of your CV; or if you proactively contact us via email or telephone.

Other sources

Other sources where we might receive your personal data include: your referee disclosing personal information; third party websites; our clients sharing information about you; a third party sending us your CV; if you 'like' our social media.

How do we use your personal data?

The main ways in which we generally use candidate data are:

- For the purpose of recruitment activities (i.e., work-finding services)
- Marketing (unless you opt out of receiving marketing materials from us)
- Equal opportunities monitoring
- To help us establish, exercise or defend legal claims
- In any appropriate future circumstance, we may also use Candidate data for profiling.

Where we have a legal basis, your consent will be assumed unless you contact us to 'opt out'.

The Company will process your personal data for the purposes of providing you with work-finding services. This includes, for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, and developing and managing our services and relationships with both Candidates and Clients.

In Some cases, we may be required to collect and process data for the purpose of investigating, reporting, and detecting crime, and also to comply with laws that apply to us.

The legal bases we rely upon to offer our services to you are:

- Your consent (e.g., to register you as a new Candidate, or Client, or to manage our relationship with you)
- Where we have a legitimate interest (e.g., managing our database and keeping work records up to date, providing work finding services to you and our Clients, and contacting you to seek your consent where it is needed)
- To comply with a legal obligation that we are subject to (e.g., in order to check your entitlement to work in the jurisdiction of the roles you are wishing to apply for)

The Company will only use your personal data for the purposes for which it was originally collected, unless we reasonably believe that another purpose is compatible with those original purposes and therefore need to use your personal data for that reason. If your personal data is used for anything other than the original intended purpose, and you wish for this to be explained then please contact us.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purposes for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the UK Data Protection Legislation and your legal rights.

How long will we keep your personal data?

The Company will only hold your personal data for as long is necessary to fulfil the purposes for which we collected it. In practice, if we have not had meaningful contact with you (or, where appropriate, the company you are working for or with), for a period of seven years in the case of Candidates, we will delete your personal data from our database, unless we believe that there is a legitimate legal basis or regulation that would require us to keep it for longer.

Where we have obtained your consent to process your personal and sensitive data, we will do so in line with our Data Protection Policy. Upon expiry of the period to which you have consented, the Company will seek further consent from you. Where consent is not granted, we will not continue to process, or store your data.

How is your data stored, transferred, or shared?

All Candidate and Client data is stored on our database (JobAdder). Sometimes, data might also be stored on a secure OneDrive. Data may also be stored in other IT systems (including the Company's email system).

Whilst we aim to store as much personal data as possible in the UK, we may store some or all of your personal data in countries outside of the UK. If this is the case, we will take additional steps to ensure

that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

- Personal data will only be stored or transferred in or to countries that are deemed to provide an adequate level of protection for personal data. For further information about adequacy decisions and adequacy regulations, please refer to the ICO.

Candidate data may be shared with various parties in various ways, and for various reasons. Primarily, we would share your data with prospective employers to provide work-finding services. If you would like to know who we might share your data with, please contact us. We might also share your personal data with other third parties, such as referencing agencies.

Client data is primarily shared to provide you with a suitable pool of Candidates.

Unless otherwise specified, we may share your information with associated third parties, such as our services providers so that we are able to provide our services.

The security of your personal data is essential to us, and so in order to protect it, we take a number of measures, including the following:

- Access to your data is limited to employees, and third parties that have a legitimate need to know. All are subject to duties of confidentiality.
- We have procedures in place for dealing with data breaches, including notifying you and/ or the ICO where legally required to do so.

How can you access your personal data?

If you want to access your personal data, or know what data we hold about you, you can request a copy of it through a 'subject access request'. All subject access requests should be made in writing to dataprivacy@leadenhallsearch.co.uk.

We do not charge a fee for subject access requests, however; if your request is 'manifestly unfounded or excess', a fee may be charged to cover administrative costs.

All subject access requests are responded to within 14 days of receipt, and in any case, not more than one month. We aim to provide a complete response, however, in for more complex requests, we might require up to three months from the date of your request to provide a full response. If this is the case, we will keep you fully informed of our progress.

If you do make a subject access request, we may ask you to verify your identity, as well as for more information regarding your request. Where legally permitted, or required to do so, we may decline your request. If this happens, we will explain the reasoning.

How to contact us

To contact us about anything to do with your data and data protection, including to make a subject access request, please use the following details:

Email: dataprivacy@leadenhallsearch.co.uk

Telephone: 02038482830

Postal: Leadenhall Search and Selection, 20 St Thomas Street, London, SE1 9RS.

We may change this Privacy notice from time to time in order to keep up with changes in the law, or if our business changes in a way that affects personal data protection. All changes will be added to our website.

This privacy notice was updated March 2024.