

IDPP – Privacy Policy

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IDPP Consulting Limited (“We” or “IDPP”) is a recruitment business that provides work-finding services to its clients and work-seekers and are committed to protecting and respecting your privacy in doing so.

Any mention of “Our Group” means our subsidiaries, our ultimate holding company and its subsidiaries, our associated companies as defined in section 1159 of the UK Companies Act 2006 (our Group).

This notice together with our terms of use <https://idpp.com/terms-and-conditions> sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us **so that we can provide work-finding services. In so doing, IDPP acts as a data controller.** The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonise data protection legislation across EU member states and the United Kingdom, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Although the UK has left the European Union as of January 21st 2021, GDPR has been and will continue to apply in the UK since 25th May 2018. The Government has incorporated GDPR in UK law post Brexit and has therefore enforced the Data Protection Act 2018.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Our nominated representatives are Peter Grint (Operations and Commercial Manager) and Abbie Waissen (Assistant Commercial Manager)

Who we are and what we do

We are a recruitment agency and recruitment business 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;
- Employees, consultants, temporary workers;

We collect information about you to carry out our core business and ancillary activities.

Information you give to us or we collect about you.

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This is information about you that you give us by filling in forms on our site <https://idpp.com/> and sending through your curriculum vitae 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, enter a competition, promotion or survey, and when you report a problem with our site.

The information you give us or we collect about you may include your name, address, private and corporate e-mail address and phone number, financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

Information we collect about you when you visit our website.

With regard to each of your visits to our site we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information (if applicable), browser type and version;
- information about your visit, including [the full Uniform Resource Locators (URL)], clickstream, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our number.

Information we obtain from other sources.

This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card and personal recommendations. In this case we will inform you, by sending you this privacy notice (or a direct URL (which is located in the signature of each and every email sent from the IDPP domain), within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.

We are working closely with third parties including companies within our Group, business partners, sub-contractors in technical, professional, payment and other services, advertising networks, analytics providers, search information providers, credit reference agencies and professional advisors. We may receive information about you from them for the purposes of our recruitment services and ancillary support services.

Purposes of the processing and the legal basis for the processing

We use information held about you in the following ways:

- To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and

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services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.

- To provide you with information about other goods and services we offer that are similar to those that you have already purchased, been provided with or enquired about.
- The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary or permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

Our legal basis for the processing of personal data is Consent, described in more detail below. In some circumstances, where required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

We will rely on contractual obligations 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 in some cases, where we are required by law or regulation to process your data.

We will in some circumstances rely on legitimate interest for particular uses of your data. Where we rely on legitimate interest, you will be informed in writing via post or email, and provided with a copy of, or link to, our privacy policy. An example of when we will rely on legitimate interest as the legal basis for processing your data is when receive your CV relative to a specific job application, as in this situation the Job provider (IDPP) and the Job Seeker (you) have aligned interest of a legitimate nature.

Our Legitimate Interests

Our legitimate interests in collecting and retaining your personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contact details is a fundamental part of this process.

In order to support our candidates' career aspirations and our clients' resourcing needs, we require a database of candidate and client personal data. The database will contain historical information as well as current resourcing requirements.

To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts.

Consent

Our primary legal basis for processing data is consent, and where we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our

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system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

Other Uses we will make of your data:

We will also use your data:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our site to ensure that content is presented in the most effective manner for you when you are using your computer or other devices;
- To notify you about changes to our service;
- To allow you to participate in interactive features of our service, when you choose to do so;
- As part of our efforts to keep our site safe and secure;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

We do undertake automated decision making or profiling. We use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process. *The purpose of the automated profiling and candidate matching is to enable our team to review the best candidates for a specific job.*

Do you have to provide us with personal data?

You may refuse to give us your personal and sensitive personal data. Furthermore, you have the right to ask us to delete, change or stop processing your data that we have already received or collected. If you do not provide us with personal or sensitive personal data, or if you request a restriction of processing however, we may not be able to provide you with the services that you have requested and that are stated in this policy.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Please see the cookie list below:

Cookie key	Domain	Path	Cookie type	Expiration	Description
_ga_H075J WMYP8	.idpp.com	/	First-party	1 year, 1 month	This cookie is used by Google Analytics to persist session state.
_ga	.idpp.com	/	First-party	1 year, 1 month	This cookie name is associated with Google

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					<p>Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports.</p>
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Disclosure of your information inside and outside of the EEA

We will share your personal information with:

Any member of our group both in the EEA and outside of the EEA.

Selected third parties including:

- Clients for the purpose of introducing candidates to them;
- Candidates for the purpose of arranging interviews and engagements;
- Clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you;
- subcontractors including email marketing specialists, event organisers, payment and other financial service providers;
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
- Analytics and search engine providers that assist us in the improvement and optimisation of our site;

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- Credit reference agencies, our insurance broker, compliance partners and other sub-contractors for the purpose of assessing your suitability for a role where this is a condition of us entering into a contract with you.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If IDPP or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use <https://idpp.com/terms-and-conditions> and/or other agreements; or to protect the rights, property, or safety of IDPP our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The lawful basis for the third-party processing will include:

- Their own legitimate interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- Satisfaction of their contractual obligations to us as our data processor;
- For the purpose of a contract in place or in contemplation;
- To fulfil their legal obligations.

Where we store and process your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (" EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services. By submitting your personal data, you agree to this processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

We utilise the following systems for storing and processing your information:

- Sales CRM – This CRM is utilised by our sales team to match your CV, Skills and other relevant information with our database of clients. It is in this system you will have the option to inform us how we use your information.
- Commercial CRM – This CRM is used by our commercial team to create your placement information and raise contracts, store your company and representative on-boarding information.

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- Timesheet Software – This is a timesheet software for raising timesheets, self-bill and processing received invoices and processing payments and is used by our invoicing team.
- Onboarding Software – the software we use, for which we will provide you a link, to collect your onboarding information for the purposes of offering work finding services. Data on this platform is transferred to our CRM (see “Commercial CRM” above) but is deleted from the Onboarding platform after 30 days of inactivity.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Retention of your data

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate interests and that you are happy for us to do so.

We do the following to try to ensure that the data we hold on you is accurate:

- our website enables you to manage your data and to review whether the details we hold about you are accurate;
- prior to making an introduction we check that we have accurate information about you;
- we keep in touch with you so you can let us know of changes to your personal data;

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data include:

- the nature of the personal data;
- its perceived accuracy;
- our legal obligations;
- whether an interview or placement has been arranged; and
- our recruitment expertise and knowledge of the industry by country, sector and job role.

We may store and handle your data in the following ways:

- We may archive part or all of your personal data, retain it on our financial systems only or delete all or part of the data from our main Customer Relationship Manager (CRM) system.

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- We may pseudonymise parts of your data, particularly following a request for restriction or erasure of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

Data Type	LEGAL BASIS	Retention period
Standard Personal Data (Name, Email Address)	Consent	2 Years from Consent
	Legitimate Interest	Whilst Relevant Only
	Contractual Obligation	7 Years post termination
Bank Details	Consent	2 Years from Consent
	Legitimate Interest	None
	Contractual Obligation	7 Years post termination
Profile Pictures	Consent	2 Years from Consent
	Legitimate Interest	Whilst Relevant Only
	Contractual Obligation	7 Years post termination
Date of Birth	Consent	2 Years from Consent
	Legitimate Interest	None
	Contractual Obligation	7 Years post termination
Location Data (Address, IP Address)	Consent	2 Years from Consent
	Legitimate Interest	Whilst Relevant Only
	Contractual Obligation	7 Years post termination
Work History / Educational History	Consent	2 Years from Consent
	Legitimate Interest	None
	Contractual Obligation	7 Years post termination
All Other Data Types	Legal Obligation	Whilst relevant to ongoing legal event, plus 2 years
	Consent	2 Years from Consent
	Legitimate Interest	Whilst Relevant Only
	Contractual Obligation	7 Years post termination

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

Your rights

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You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for marketing purposes or if we intend to disclose your information to any third party for marketing purposes. We will collect 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 processing for marketing purposes by checking the boxes on the forms we provide you when we collect your data. You can also exercise the right to not have your data used for marketing purposes at any time by contacting us at GDPR@idpp.com.

Our site 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 data to these websites.

The GDPR provides you with the right to:

- **Request correction** of the 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 remove 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 restriction 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** If you have any issues or concerns then we ask that in the first instance you set this out in writing and send this to GDPR@idpp.com. This does not remove your right to make a complaint to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

Access to information

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The Data Protection Act 2018 and the GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete. Your right of access can be exercised in accordance with the Act and the GDPR.

A subject access request should be submitted to GDPR@idpp.com. No fee will apply unless the requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character. In such circumstances, we may charge a fee or refuse to act on the request.

Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to GDPR@idpp.com.