

**Privacy Notice - General Data Protection Regulation (GDPR) for:
Clients, sub-contractors and professional partners**

Contents:

1: Introduction..... 2

2: Data processing of personal information about clients, sub-contractors, suppliers and our professional partners:..... 4

3: Data processing of personal information about clients’ employees’ and candidates involved in recruitment processes: 6

4: Do we need your consent to process personal information? 8

5: If you fail to provide personal information 8

6: Change of purpose 9

7: Automated decision making..... 9

8: Information about criminal convictions..... 10

9: Data sharing 10

10: Transferring information outside the eu 12

11: Data security..... 12

12: Data retention 13

13: Rights of access, correction, erasure and restriction 13

14: Right to withdraw consent..... 14

16: Further information: 15

1: Introduction

What is the purpose of this document?

Integra HR Ltd takes the privacy of their clients and other people they work with, very seriously. We are committed to protecting the privacy and security of personal information that we are privy to. As data processors, Integra HR Ltd. are responsible for deciding how we hold and use personal information about our clients, sub-contractors, suppliers and our professional partners. We are also responsible for processing personal data about our clients' employees' and recruitment candidates that clients request us to process while we work together. Under data protection legislation we need to let you know of the information contained in this privacy notice.

This privacy notice describes how we collect and use personal information about:

- a. our clients', sub-contractors, suppliers, professional partners
- b. our clients' employees'
- c. and candidates involved in a recruitment process that our clients have requested our involvement with,

during and after working with clients, sub-contractors, suppliers and our professional partners, in accordance with the General Data Protection Regulation (GDPR).

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions, so that you are aware of how and why we are using such information.

This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

What is personal information?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

A note about privacy by design:

The GDPR requires that personal data that is held and processed is not excessive. Integra HR have a policy of minimising the data that is shared while we are working with you. This means that if we are discussing a particular employee related matter with a client who needs advice on the correct process to follow, then there may be no need to provide personal information such as names or job titles of the individual/s concerned. Therefore, the information shared would not be personal information as it would not identify the individual. We greatly appreciate clients' assistance in minimising the personal information about their employees' that is lawfully shared with us while we work together.

Our promise

We will comply with data protection principles which say that the personal information we hold about must be:

- i. Used lawfully, fairly and in a transparent way.
- ii. Collected only for valid purposes that have been clearly explained to the data subject and not used in any way that is incompatible with those purposes.
- iii. Relevant to the purposes stated and limited only to those purposes.
- iv. Accurate and kept up to date.
- v. Kept only as long as necessary for the purposes stated.
- vi. Kept securely.

Who's personal information will we process?

We collect and process personal information about:

- a. our clients', sub-contractors, suppliers, professional partners
- b. our clients' employees'
- c. and candidates involved in a recruitment process that our clients have requested our involvement with.

The following sections explain what information we process and on what grounds.

2: Data processing of personal information about clients, sub-contractors, suppliers and our professional partners:

What personal information will we process about clients, sub-contractors, suppliers and our professional partners?

We may collect, store, and use the following categories of personal information about clients, sub-contractors, suppliers and our professional partners:

- Personal details such as name, title, gender, bank account details;
- Contact details such as addresses, telephone numbers, and e-mail addresses;
- Photographs.

We may also collect, store and use the following “special categories” of more sensitive personal information about clients:

- Genetic and biometric data, such as DiSC® profiling or information from psychometric assessments;
- Health related matters in order to provide appropriate advice related to employment.

How we will collect this personal information:

We will usually obtain your contact details as a result of you providing them to Integra HR Ltd. and we will continue to collect personal information in the course of HR consultancy-related activities throughout the period that we work together (for example: when clients ask Integra HR to provide a proposal or a quote). We may also be provided with your contact information from a third party who recommends your services (with your agreement to do so) as a sub-contractor, suppliers or professional party or we may obtain this information directly from the internet.

The legal grounds for us using this personal information:

We will only use your personal information when the law allows us to. This includes but is not limited to the following grounds:

- a. Where we need to perform the contract we have entered into with you. For example;
 - Determining the terms on which to work together
 - Invoicing and making decisions about rate reviews and expenses
 - Administering the contract we have entered into with you
 - Making decisions about our continued engagement
 - Making arrangements for the continuation and/or revision and/ or termination of our working relationship
- b. Where we need to comply with a legal obligation or support you to comply with a legal obligation upon you. For example:
 - Support with procedural obligations related to absence management, performance management, disciplinary and grievance issues

- Advising you on how to check if potential employees and/ or current employees of clients are legally entitled to work in the UK
 - Preparation of employment related documents, such as offer letters, principle statements and contracts of employment
 - Supporting clients with the processes and procedures of exiting employees, either via resignation, dismissal, redundancy or other legal means (e.g. settlement agreements)
 - Supporting clients with re-organisations and/or re-structures of their teams
 - Complying with health and safety and/ or tax obligations.
 - Preparation of relevant information for any legal proceedings or insurance claims involving you, or clients' employees
 - Where responding to a subject access request
- c. Where it is necessary for our legitimate interests (or those of a third party) and the interests and fundamental rights of the data subject do not override those interests. Examples include:
- Business management and planning, including accounting and auditing.
 - Education, training and development requirements.
- d. Where we need to protect your interests (or someone else's interests).
An example of this may be where we are providing advice and guidance to clients (in order to meet our contractual obligations) so that clients may fulfil their contractual obligations to one of their employees. In these circumstances they are likely to need to share personal data about an employee or group of employees' or job applicants with Integra HR Ltd. (see section 9 about data sharing). Examples of where we need to protect your interests (or someone else's interests) will include:
- Dealing with legal disputes involving clients', clients' employees, clients' job applicants, workers and contractors, including accidents at work
 - Conducting data analytics studies to review and better understand employee engagement, retention and attrition rates.
 - Supporting clients to ascertain an employee's fitness to work.
 - Supporting clients to manage employee sickness absence
 - Supporting clients with disciplinary and grievance procedures involving their employees
 - Supporting clients with performance reviews, managing performance and determining performance requirements.
 - Supporting clients with assessing an employee or job candidate's qualifications for a job or task, including decisions about promotions
 - Supporting clients with the processes and procedures of exiting employees, either via resignation, dismissal, redundancy or other legal means (e.g. settlement agreements)
 - Supporting clients with re-organisations and/or re-structures of their teams

We may also use your personal information in the following situations, which are likely to be rare:



- e. Where it is needed in the public interest or for official purposes.

However, some of the grounds will overlap and there may be several grounds which justify our use of personal information.

3: Data processing of personal information about clients' employees' and candidates involved in recruitment processes:

What personal information will we process about clients' employees and their recruitment candidates?

On occasion we will need to be provided with and process the personal data of clients' employees and job applicants', upon our clients' instructions. This data may include:

- Personal details such as name, title, gender
- Contact details such as telephone numbers and e-mail addresses
- Photographs
- Disciplinary and grievance information.
- Information about performance, conduct and/ or behaviour at work
- Attendance information
- Start date and length of service
- Career history
- Location of employment or workplace
- Recruitment information (including references and other information included in a CV or cover letter or as part of the application process).]
- Employment records (including job titles, work history, working hours, training records and professional memberships).
- Salary, annual leave, pension and benefits information

We may also collect, store and use the following "special categories" of more sensitive personal information about our clients' employees' and candidates involved in recruitment processes:

- Genetic and biometric data, such as DiSC® profiling or information from psychometric assessments.
- Marital status and dependants
- Information about health, including any medical condition, health and sickness records
- Trade union membership
- Information about criminal convictions and offences
- Genuine occupational requirements relating to a particular job role

How we will use particularly sensitive information about clients' employees or candidates involved in a recruitment process:

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following grounds:

- a. In limited circumstances, with clients', clients' employees' or candidates' explicit written consent;
- b. Where we need to carry out our legal obligations or assist our clients in carrying out their legal obligations;
- c. Where it is needed in the public interest, such as for equal opportunities monitoring;
- d. Where it is needed to assess the working capacity of clients' employees on health grounds, subject to appropriate confidentiality safeguards;
- e. Where it is needed in relation to legal claims or where it is needed to protect client interests (or someone else's interests) and our client or their employee, are not capable of giving consent, or where our client or a client's employee have already made the information public.

We will use particularly sensitive personal information about clients' employees and/ or candidates involved in their recruitment process in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to support clients to comply with employment and other laws.
- We will use information about the physical or mental health, or disability status of clients' employees to help clients:
 - ensure the health and safety of their employees' in the workplace
 - to assess their fitness to work,
 - to provide appropriate workplace adjustments,
 - to monitor and manage sickness absence and to administer benefits
- We may use information about protected characteristics of the employees and/ or recruitment candidates of clients (such as the race or national or ethnic origin, religious, philosophical or moral beliefs, sexual life or sexual orientation), to support clients with ensuring meaningful equal opportunity monitoring and reporting and/ or when supporting a client with a recruitment process where the role being recruited for has a genuine occupational requirement.
- We will use trade union membership information to support clients to comply with employment law obligations.
- Supporting clients to assess working capacity of an employee or recruitment candidate as part of a developmental or recruitment activity including DiSC® profiling and/ or psychometric testing.
- We may also use information about physical or mental health, or disability of recruitment candidates to support clients to make reasonable adjustments to enable all candidates to fully partake in recruitment and selection processes.

How we will collect this personal information:

We will usually obtain personal information about client's employees by clients sharing this data with us. We will have appropriate data sharing agreements in place, either as separate documents or as part of a contract for services with our client's, sub-contractors and professional partners.

We collect personal information about candidates in a recruitment process, through the application and recruitment process, either directly from candidates or as a result of a client sharing this information with us, or sometimes from an employment agency or background check provider. Integra HR. Ltd will only obtain this information if it has been instructed by a client to do so.

Before the data of recruitment candidates is shared with Integra HR Ltd. the data controller (our client or the recruitment agency) will have informed candidates that their data will be shared with us, or after they have gained a candidates consent to do so and informed them why it is necessary to do so. As part of the recruitment process we may sometimes be instructed by clients to collect additional information from third parties including psychometric test providers, former employers, credit reference agencies or other background check agencies, but will only do so with the candidate's prior knowledge and, where required, with their express consent to do so.

4: Do we need your consent to process personal information?

We do not need consent if we use special categories of personal information to carry out our legal obligations or exercise specific rights in accordance with employment law, or to support our clients to do so. In limited circumstances, we may approach individuals or ask our clients to approach their employees for written consent to allow us to process certain particularly sensitive data. If we do so, we will provide full details of the information that we would like and the reason we need it, so that you or if you are a client: your employees' and/ or recruitment candidates, can carefully consider whether they wish to consent. You should be aware that it is not a condition of your contract with us that you or your employees, if you are a client, agree to any request for consent from us.

5: If you fail to provide personal information

If certain information is not provided when required, we may not be able to perform the contract we have entered into with clients (such as providing a proposal, a quote or the appropriate HR advice), sub-contractors, suppliers and our professional partners. We also may be prevented from supporting you to comply with your legal obligations.

If client's or their job applicants involved in a recruitment process do not provide certain information when requested, then we may not be able to support clients and their candidates through the recruitment and selection process.

6: Change of purpose

We will only use your personal information, and in the case of our clients: the personal information of their employees and job applicants, that are shared with us, for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information, or that of clients' employees' or recruitment candidates, for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information, without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7: Automated decision making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you. We are allowed to use automated decision-making in the following circumstances:

- Where we have notified the data subject of the decision and given them 21 days to request a reconsideration.
- Where it is necessary to perform the contract with the data subject and appropriate measures are in place to safeguard their rights.
- In limited circumstances, with the explicit written consent of the data subject and where appropriate measures are in place to safeguard their rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either the explicit written consent of the data subject or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard their rights.

We do not envisage that any decisions will be taken about clients, candidates involved in a recruitment process, sub-contractors, suppliers and our professional partners using automated means, however we will notify you in writing if this position changes.

8: Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations or to enable clients to carry out the obligations upon them. We may also use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and the data subject is not capable of giving their consent, or where the data subject has already made the information public.

Where appropriate, in consideration of the nature of the role and where we are legally able to do so, we may collect information about criminal convictions on behalf of clients as part of the recruitment process.

9: Data sharing

We may have to share your data with third parties, including third-party service providers and other professional partners. We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Our contracts for service include details about data sharing. Clients and professional partners are responsible for informing their employees and recruitment candidates that their personal information will be shared with Integra HR Ltd, what personal data will be shared, the legal grounds and purposes for sharing their data, prior to their data being shared.

We have privacy notices available to provide specifically to recruitment candidates and employees of clients. Should clients like copies of these, please contact the Director of Integra HR Ltd.

Sharing your information with third parties and other professional partners

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with clients, sub-contractors and/ or professional partners or where we have another legitimate interest in doing so.

“Third parties” includes third-party service providers (including contractors and designated agents) and other professional parties. The following activities are carried out by third-party service providers: accounting services, IT services, psychometric and personality testing. The legal grounds for Integra HR. Ltd. sharing data with third parties are summarised below:

Legal basis for sharing data Third party	Current provider	Personal information that may be shared	Grounds for sharing data
Accounting Services	Solutions for Tax	Company name (which could also be an individuals name)	Our legitimate interests and legal obligations. For business management and planning, including accounting and auditing purposes.
IT services	Quad computing	Company names, e-mail addresses of: clients, client's candidates and subcontractors. This will not be proactively shared but IT providers may view this information where they provide IT support to us.	Our legitimate interests and legal obligations. For business management and planning. In order to carry out our contractual obligations to clients and sub-contractors.
Psychometric test providers	Agreed with client when such tests are requested by the client.	Client name and contact details, candidate name and contact details.	In order to carry out our contractual obligations to clients and only on a client's instruction and with the candidates prior knowledge.

All our third-party service providers and other professional parties are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will share personal information of clients' employees and candidates involved in a recruitment and selection process with us, with third party service providers and/ or



professional partners, to enable for example, psychometric testing and/ or personality profiling to be completed. We will only do this if instructed to do so by a client, with the prior knowledge of recruitment candidates, and/or where required, with individual's consent.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

We may vary our third-party service providers at any time.

10: Transferring information outside the EU

We will store and process minimal personal information about you, in accordance with GDPR. We use third parties to store data electronically and this could include some personal information about you or, in the case of our clients: their employees.

We, or our third-party service providers, may transfer the personal information we collect about you to outside the EU in order to perform our contract with you or for our legitimate interests. These countries may have data protection laws that are different to EU laws (and, in some cases, may not be as protective).

However, to ensure that your personal information does receive an adequate level of protection we have taken appropriate safeguards to require that your personal information will remain protected. To ensure that your personal information is treated by third parties in a way that is consistent with and which respects the EU and UK laws on data protection, we have put in place the following appropriate measures: the European Commission's Standard Contractual Clauses and the EU-U.S. Privacy Shield Framework certification. If you require further information about these protective measures, you can request it from the Director of Integra HR Ltd or it is available on: [third party protective measures](#).

11: Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those agents, contractors and other third parties who have a legitimate basis to do so or need to do so to fulfil their contractual obligations with us (for example third party IT and accountancy services). They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Director of Integra HR Ltd.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

12: Data retention

We will only retain personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for which we process the personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise personal information so that it can no longer be associated with the data subject, in which case we may use such information without further notice to the data subject. Once you are no longer a client, a candidate involved in a recruitment process, a sub-contractor, supplier or a professional partner of the company we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

13: Rights of access, correction, erasure and restriction

It is important that the personal information we hold about you, clients' employees and recruitment candidate is accurate and current. Please keep us informed if the personal information changes during your working relationship with us.

Under certain circumstances by law, data subjects (i.e. you and clients' employees and recruitment candidates, if the personal information is about them) have the right to:

- **Request access** to their personal information (commonly known as a "data subject access request") that we hold. This enables you or clients' employees' and recruitment candidates to receive a copy of the personal information we hold about them and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you or clients' employees' and recruitment candidates. This enables you, clients' employees' and recruitment candidates to have any incomplete or inaccurate information we hold about them to be corrected.
- **Request erasure** of personal information. This enables you, clients' employees' and recruitment candidates to ask us to delete or remove personal information where there is no good reason for us continuing to process it. Data subjects also

have the right to ask us to delete or remove their personal information where they have exercised their right to object to processing (see below).

- **Object to processing** of personal information where we are relying on a legitimate interest (or those of a third party) and there is something about the data subject's particular situation which makes them want to object to processing on this ground. They also have the right to object where we are processing their personal information for direct marketing purposes.
- **Request the restriction of processing** of personal information. This enables data subjects to ask us to suspend the processing of personal information about them, for example if they want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of personal information to another party. If a data subject wants to review, verify, correct or request erasure of their personal information, object to the processing of their personal data, or request that we transfer a copy of their personal information to another party, please contact the Director of Integra HR Ltd. in writing.

The data subject will not have to pay a fee to access their personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if the request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from the data subject to help us confirm their identity and ensure their right to access the information (or to exercise any of their other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

14: Right to withdraw consent

In the limited circumstances where you, or a client's employee or recruitment candidate, may have provided consent to the collection, processing and transfer of personal information for a specific purpose, you/ they have the right to withdraw consent for that specific processing at any time. To withdraw consent, please contact the Director of Integra HR Ltd. Once we have received notification that you/ they have withdrawn consent, we will no longer process information for the purpose or purposes originally agreed to, unless we have another legitimate basis for doing so in law.

15: Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information or, if you are a client, the personal information that you have shared with us about your employees and/ or recruitment candidates.

16: Further information:

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

If you have any questions about this privacy notice or how we handle your personal information, please contact:

Joanne Wurpillot
Director
Integra HR Ltd.
Phone: 07852 651651
e-mail: joanne@integrahr.co.uk