Privacy Notice (External)

GRN Search Group Limited

Introduction

This Privacy Notice sets out the basis on which we use personal data in the course of our business activities.

We are GRN Search Group Limited of 16 Northland Row, Dungannon, Tyrone, Northern Ireland, BT71 6AP. We are registered in Northern Ireland under company number NI694615. Our ICO registration number is ZB517938

As a business which relies upon having access to a database of pre-qualified Candidates to meet our Clients' requirements, data is essential to our business. Our systems and processes are designed to ensure that we can provide the best possible service to our clients while operating within the law at all times and protecting individuals' data privacy rights.

We reserve the right to update this Privacy Notice from time to time. Where appropriate, we shall contact you to notify you of any material changes to the Privacy Notice. You should also refer to our website periodically so that you may access and view our updated Privacy Notice. This will ensure that you understand (i) how we are using your personal data and (ii) your legal rights around our usage of such personal data.

Who Should Read This Privacy Notice?

This Privacy Notice applies to any living, identifiable individuals about whom we may process personal data in the course of our business activities. You should read this Privacy Notice if you are a:

- **Candidate**
- **Client Contact**
- **Referee**
- **Supplier Representative**

If you are an employee, applicant for employment or in-house temporary worker, you should refer to our internal Privacy Notice instead. This is available to view at https://grn.group/privacy-policy/

Definitions

This Privacy Notice uses the following defined terms.

Candidate means a person who is registered with GRN Search Group as seeking or potentially seeking new employment or engagement. This includes individuals who are not actively seeking a new role but who would like to remain in contact with GRN Search Group about potential opportunities which may be of interest from time to time.

Client means a business which has engaged GRN Search Group to provide services or which GRN Search Group has identified as a business for which GRN Search Group wishes to perform services. In some cases, the Client Contact and the Client may be the same person e.g. where a Client is a sole trader.

Client Contact means a person who is employed or engaged by a Client and with whom GRN Search Group may liaise in respect of any services which GRN Search Group is providing or wishes to provide to the Client. In some cases, the Client Contact and the Client may be the same person e.g. where a Client is a sole trader.

Data Protection Legislation means the Data Protection Act 2018 and the UK version of the GDPR together with any other UK legislation relating to data privacy, as amended or replaced from time to time;

Referee means a person who has provided to GRN Search Group a written or verbal opinion in respect of the work history, skills, competency and/or experience of a Candidate;

Supplier means a business which provides services to GRN Search Group and which may process personal data relating to any Candidate, Client Contact or Supplier Representative in the course of performing such services.

Supplier Representative means a person who is employed or engaged by a Supplier and with whom GRN Search Group may liaise from time to time in respect of the services which are provided by that Supplier.

Third-Party Services Provider means any relevant third-party business which provides services to us, such as our:

- Professional advisers including accountants, tax advisors and lawyers;
- Insurers;
- IT services providers and software providers;
- Independent consultants and subcontractors

How We Obtain Personal Data

We obtain personal data from a number of different sources, depending on whether you are a **Candidate**, a **Client Contact** or a **Supplier Representative.**

If you are a **Candidate**, we may obtain personal data relating to you:

- Directly if you have:
    - applied for a Client vacancy through us
    - uploaded your CV through our website
    - asked us to provide any work-finding services to you
    - engaged with us through any networking activities or events
    - had any discussions with us about finding alternative employment

- Indirectly from:
    - online professional networking sites such as LinkedIn
    - social networking sites such as Facebook or Twitter
    - job boards such as Total Jobs, CV Library, Jobsite, Career Structure and Gulf Talent
    - Clients who provide feedback about applications for employment or engagement which you have made, interviews which you have attended and assignments which you have carried out
    - Referees who provide information about your employment experience and their opinion as to your skills and aptitude
    - your employer's website and other industry-related websites
    - business information directories and online industry databases
    - telephone calls between parties
    - where appropriate, third-party background checking services such as the Disclosure & Barring Service

If you are a **Client Contact** or **Supplier Representative**, we may obtain personal data relating to you:

- Directly in the course of (i) us providing services to the Client or (ii) the Supplier providing services to us, as applicable; or

- Indirectly from:
    - online professional networking sites such as LinkedIn
    - your employer's website and other industry-related websites
    - business information directories
    - telephone calls between parties
    - other individuals within your organisation in the course of (i) us providing services to you or (ii) you providing services to us, as applicable.

If you are a **Referee**, we may obtain personal data relating to you:

- Directly from you in the course of any communications between us; or

- Indirectly from the Candidate who has nominated you as his or her Referee

Types of Information We Hold

If you are a **Candidate,** we may collect, store and process the following types of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and email addresses;
- Your gender, date of birth, nationality and place of residence;
- Your professional skills and experience;
- Your qualifications, training and certifications;
- Proof of your right to work in the United Kingdom such as copies of your passport and, where applicable, visa, residence permit or similar government documents;
- Proof of your identity and address, such as copies of your driving licence, utility bills or similar documents;
- Information about your current or most recent role, including your job title, department, reporting line, responsibilities, salary, benefits and notice period;
- Your motivation and reasons for seeking new employment;

- Any information within your CV or any application document which a Client may require you to complete;
- Any background information which you provide to us during the course of your dealings with us;
- Details of any Clients to whom you have been introduced by us;
- Details of any interviews which you have attended and our Clients' feedback on those interviews;
- Details of any position which you take up with a Client, including your role, duties, remuneration, department and location;
- If you provide any services on a freelance basis:
    - Details of any limited company through which you contract and the nature of your relationship with that company;
    - Information about the days and times which you have worked;
    - Your bank details, tax code and National Insurance Number; and
    - Information about any services which you have carried out, including any comments, feedback and issues relating to such services.

We may also ask for your consent to collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity;
- Information about your health, including any medical condition, health and sickness records; and
- Information about criminal convictions and offences.

If you are a **Client Contact**, we will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and email addresses;
- Your job title and position within the Client organisation; and
- Any background information relating to your personal circumstances, your work history and the role which you perform within the Client which you may provide to us in the course of your dealings with us.

We do not collect, store or use any "special categories" of sensitive personal information if you are a **Client Contact**.

If you are a **Referee**, we will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and email addresses;
- Your job title and position within your employer; and
- Any background information which you may provide to us in the course of your dealings with us.

We do not collect, store or use any "special categories" of sensitive personal information if you are a **Referee**.

If you are a **Supplier Representative**, we will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and email addresses;
- Your job title and position within the Supplier organisation; and
- Any background information relating to the role which you perform within the Supplier which you may provide to us in the course of your dealings with us.

We do not collect, store or use any "special categories" of sensitive personal information if you are a **Supplier Representative**.

How We Use Personal Data

If you are a **Candidate**, we may use your personal data to:

- Assess and verify your potential suitability for employment with a Client;
- Contact you in relation to any potential employment opportunities with a Client;
- Introduce you to our Clients and potentially arrange for you to fill a Client vacancy;
- Stay in regular contact with you to understand your current position, career aspirations and motivation for finding new employment;
- Where applicable, make payments to you or arrange for any third-party company through which you may contract to make payments to you;
- Contact you to ask for a referral;
- Produce anonymised statistical data;
- Comply with our legal obligations, defend or bring any legal proceedings and prevent fraud or any other crime; and
- Conduct equal opportunities monitoring.

If you are a **Client Contact**, we may use your personal data to:

- Contact you to obtain information about our Client's requirements;
- Liaise with you so that we may effectively perform the services to our Client;
- Obtain a reference for a Candidate;

- Contact you for invoicing and credit control purposes;
- Comply with our legal obligations, defend or bring any legal proceedings and prevent fraud or any other crime.

If you are a **Referee**, we may use your personal data to:

- Contact you to obtain a reference on a Candidate;
- Provide a copy of the reference to our Client;
- Comply with our legal obligations, defend or bring any legal proceedings and prevent fraud or any other crime.

If you are a **Supplier Representative**, we may use your personal data to:

- Liaise with you in respect of the services which are being provided by the Supplier;
- Contact you in relation to billing matters;
- Comply with our legal obligations, defend or bring any legal proceedings and prevent fraud or any other crime.

Our Lawful Basis for Processing Data

We have determined that we have a legitimate interest to process your personal data where you are:

- A **Candidate**, on the basis that it is necessary for us to maintain a database of individuals who are (i) actively seeking new employment with a Client or (ii) potentially suitable for employment with a Client. By processing your personal data and contacting you from time to time, we are able to gain an understanding of your current role (where applicable), your skills and experience, and your career aspirations. Our processing of your personal data is therefore of benefit to:

    - You, as it assists us to identify new employment opportunities about which you might not otherwise been aware and to give general advice and guidance in support of your career development;

    - Our Clients, who rely on us to have access to suitable, pre-qualified candidates who can fill their requirements; and

    - Us, as we are a commercial enterprise which relies upon being able to introduce Candidates to our Clients

  If you are a Candidate, we may also need to process sensitive (special) personal data relating to you. The type of sensitive personal data which we might process includes (i) information about any medical conditions or disability insofar as they are relevant to the type of work which you are proposing to carry out (ii) information about any unspent criminal convictions and, where relevant to the type of role which you are carrying out, spent convictions, police warnings etc and (iii) information about any trade union of which you are a member (but only insofar as it relates to an employment claim or pay and working conditions on a client site).

  We are acting as an employment agency and/or an employment business in our dealings with you. In accordance with Article 9 (2)(b) of the UK GDPR, this sensitive personal data is necessary for performing our obligations as an employment agency/employment business and is used solely for this purpose. Any sensitive personal data shall be deleted in accordance with our policy on data retention.

- A **Client Contact**, on the basis that we need to be able to contact and interact with the individuals who are employed or engaged by our Clients. This will allow us to effectively provide services to them, better understand their requirements and generate revenue for our business.

- A **Referee**, on the basis that we are generally required to obtain references to comply with our contractual obligations to third parties and, in some instances, we are under a legal obligation to do so. It is therefore necessary and reasonable for us to process personal data relating to you strictly for compliance with these obligations.

- A **Supplier Representative**, on the basis that we need to be able to contact and interact with the individuals who are employed or engaged by our Suppliers. This will allow us to ensure that our Suppliers provide us with the best possible service which, in turn, is of direct benefit to both our Candidates and our Clients.

Where We Process Personal Data

Your personal data is held and processed by us in the United Kingdom.

In addition to our database, we may use Microsoft OneDrive to store personal data relating to you. We have ascertained that this data is kept within a data centre within the United Kingdom.

We have put in place appropriate safeguards to ensure that your data is only transferred to jurisdictions with enforceable data subject rights and effective legal remedies in respect of data privacy breaches. We will therefore only transfer your personal data to jurisdictions outside of the UK and EEA where:

- There is an adequacy decision in respect of such jurisdiction. *This means that the ICO and European Commission have pre-approved the data privacy regime in the relevant country. At present, the approved jurisdictions are Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, and Uruguay.*

- The transfer of data is subject to the standard contractual clauses. *This means that we have a data-sharing agreement in place which complies with the requirements set out by the ICO;* or

- You have expressly given informed consent to the transfer of such data. *This means that you have not only agreed to the transfer but have done so in the knowledge that your data may be transferred to a jurisdiction which does not give you the same degree of protection as you have within the UK and EEA.*

Parties with Whom We May Share Data

If you are a **Candidate**, we may share your personal data for legitimate purposes with:

- A Client where you have expressed an interest in being introduced to such Client or are being supplied to such Client on an assignment;
- Any third-party which is engaged by the Client to assist them in the recruitment process including a managed service company, Recruitment Process Outsourcing provider or IT services provider;
- A third-party company through which you are contracting;
- A third-party company to which you have specifically asked to be introduced or referred, such as an insurance company or intermediary (umbrella) company;
- Background checking services such as the Disclosure & Barring Service;
- Industry bodies which are relevant to the market sector in which you work;
- Recruit Asap Limited, who have shared owners to the Company, who provide temporary recruitment services
- Third-Party Services Providers who in some cases may use their own subcontractors and sub-processors;
- Our bankers and recruitment finance providers;
- Governmental departments and agencies where we are permitted or required by law to do so.

We may also share your information with Clients on an anonymised basis where we have agreed to provide general statistical information. In these circumstances, you will not be identifiable and the information is therefore not personal data.

If you are a **Client Contact**, we may share very limited data relating to you with a Candidate where such sharing is strictly required for the recruitment process e.g. so that the Candidate may contact you directly. We will also share your personal data with Third-Party Services Providers for legitimate business purposes. We may also share limited data relating to you with Recruit Asap Limited, who have shared owners to the Company, and who provide temporary recruitment services.

If you are a **Referee**, we will share with our Clients the details of any reference which you may give. We will usually provide your name, job title and employer name when doing so. In some circumstances and only when you have agreed to such disclosure, we will provide your contact details so that our Client may verify the reference or ask for further information. We will also share your personal data with Third-Party Services Providers as well as Recruit Asap Limited, who have shared owners to the Company and provide temporary recruitment services for legitimate business purposes.

If you are a **Supplier Representative**, we will share your personal data with other Third-Party Services Providers for legitimate business purposes. We may also share limited data relating to you with Recruit Asap Limited, who have shared owners to the Company, and who provide temporary recruitment services

Our Website

If you interact with our website https://grn.group/, we may process information relating to your usage of the website. Please refer to our website's Cookie Policy for information about how we use cookies to optimise our website and track its usage.

Automated Decision Making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. All decisions which are made in the course of our business processes involve human intervention. We do not therefore make any decisions about you using automated means, whether you are a **Candidate**, **Client Contact, Referee** or **Supplier Representative**.

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 employees, agents, contractors and other third parties who have a business need to know. 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 a Director.

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.

Data Retention

We will only retain your 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 your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Our standard data retention period is three years from the last date on which we are in actual contact with you i.e. where we actually speak with you or exchange correspondence. After this time, we will usually delete your personal data from our records.

Where we are required to keep any information (i) for auditing or compliance purposes (ii) to comply with our contractual obligations to third parties or (iii) in respect of any potential or actual legal proceedings, we shall keep your data for as long as is strictly necessary for these purposes, which is typically for seven years in respect of audit data which we may be required to produce for HRMC and/or to prove compliance with our contractual and legal obligations.

In some circumstances we may completely anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information. Under certain circumstances, you have the right to:

- Request **access** to your personal information (a Subject Access Request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. You will not usually have to pay a fee to access your personal information but we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

- 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 the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed or you have objected to the processing and there is no overriding legitimate interest for continuing the processing.

- **Object** to processing of your personal information where we are relying on a legitimate interest and you object on "grounds relating to your particular situation."

- Request the **restriction** of processing of your personal information. This enables you to ask us to block or suppress the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it or if you have also objected to the processing as above.

- Request the **transfer** of your personal information to another party when the processing is based on consent and carried out by automated means. This right is not applicable to any data processing carried out by GRN Search Group Organisation.

If you want to exercise any of the above rights, please contact a Director in writing. We will consider your request and confirm the actions which we have taken in response to such request.

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

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact a Director. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. We will confirm the actions which we have taken in respect of any such request.

If you are unhappy with any aspect of the manner in which we have processed your personal data or dealt with your decision to exercise any of the rights set out in this section, you have the right to complain to the Information Commissioners Office in the United Kingdom. Their details are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF Tel: 0303 123 1113 (local rate) or 01625 545 745. Email: casework@ico.org.uk

Contacting Us

If you have any questions about this Privacy Notice, you can write to our Managing Director at GRN Search Group, 16 Northland Row, Dungannon, Tyrone, Northern Ireland, BT71 6AP. Alternatively, you may telephone us on 0161 416 6060 or email us at dan@socium.uk.