

Data Protection

PRIVACY POLICY

OUR ROLE AS A DATA CONTROLLER

In order to carry out our business function, it is necessary for us to obtain personal data about candidates and submit some or all of this data to employers who we are working with to fill a vacancy.

Our legal basis for collecting this data is Legitimate Interest, because we have been instructed by our client to find suitable candidates for their vacancies, and should the vacancy be filled with a candidate we represent, we will be paid a fee. It is also in the candidates' interests that we process their data, to represent them in an application to a contract or permanent role.

We find candidates primarily through our own networks, as well as job boards or social media sites like Linked In. We only search for candidates based on a specific job specification that we have been instructed to work on. If we find candidates who we think may be interested in the role, we contact them through the details that they have provided. We only contact candidates who we think will be expecting to be contacted (ie. have purposefully and knowingly added their details to a job board or networking site).

We do not search for candidates on a 'general' basis, only for a specific role we are recruiting for. We do not try to obtain personal information from anywhere online other than through job boards or career networking sites that candidates have signed up to. We do not look at personal social media pages that are not designed for career networking or job searching.

Once we contact a candidate and ascertain their interest for the role we are working on, we send that candidate our privacy statement by email so that they are fully aware of how we intend to use their data.

We have privacy agreements with all of our clients, which means that we have sent them our Privacy Policy and they have confirmed that as a Data Controller and Processor themselves, they will adhere to Data Protection Regulations in the processing of our candidates' data.

OUR ROLE AS A DATA PROCESSOR

Once we contact a candidate and ascertain their interest for the role we are working on, we send that candidate our privacy statement by email so that they are fully aware of how we intend to use their data.

We have an electronic database (called a Candidate Relationship Management system) where personal information can be securely and privately held. We use this

database to allow us to contact candidates, and to track the status of applications for roles that we are working on. Data will be held for as long as the candidate's application for the role is live.

Because we often work on similar roles, we also keep candidates' data for a period of 12 months so that we can contact them about other suitable roles should they become available. Data subjects have the right to ask us to stop processing their data at any time. In this case, we will delete all the data we hold within 10 working days, unless we are legally required to keep the data.

We will, to the best of our ability, keep candidates' information updated and relevant by regularly updating our Candidate Relationship Management system. Should candidates wish to be removed from the database at any time, they can contact us and ask us to delete their data from our records, following which we will delete all the data we hold within 10 working days.

INDIVIDUAL RIGHTS

In line with the General Data Protection Regulation (GDPR), data subjects are entitled to several individual rights with regards to their data. These rights are listed below, along with Civitas Recruitments approach to complying with them:

- The right to be informed – once we have collected the data, we provide data subjects with privacy information, including our purpose and legal basis for processing their personal data, the retention period for this data, and who it will be shared with.
- The right of access – data subjects can contact us to ask for access to their data and we will provide the information to them free of charge and within 1 month of the request.
- The right to rectification – candidates can contact us to ask that we rectify, amend or edit the personal data we hold. We will also ensure that any updates are shared with third parties with whom the data has been shared.
- The right to erasure – data subjects can request that we delete their personal data at any time. On receipt of this request we will delete the data we hold within 10 working days and inform any third parties with whom the data has been shared that the request has been made. The only exception to this would be if we had to process the data to comply with a legal obligation.
- The right to restrict processing – data subjects can contact us to request that we refrain from processing their data. We will comply with this request upon receipt and inform any third parties with whom the data has been shared.
- The right to data portability - data subjects can contact us to ask for access to their data and we will provide the information to them free of charge and within 1 month of the request. We can also transfer the data to another organisation if requested and if technologically feasible.
- The right to object – Individuals have the right to object to the processing of their personal data. If this happens we will immediately stop processing the data.

- Rights related to automated decision-making – we do not carry out automated decision-making.

Please contact us through the address on our Contacts page if you have any questions about this Privacy Policy or wish to exercise any of the rights set out above.