



# Privacy Policy

**EasyRecruitUK.com Limited** ('the Company') is a recruitment & labour provider business which acts on behalf of candidates for work-finding and assignments, in conjunction with providing recruitment services, training and related support functions to our Clients and third-party entities.

The Company requires to process personal data so that it can provide these above-mentioned services – therefore in doing so, the Company acts as a “Data Controller”. The Company also carried out permanent staffing payroll processes on behalf of specific Clients and therefore in these circumstances the Company acts as the “Data Processor”

We will only use your personal data in accordance with the terms outlined in our contracts and our Privacy Policy.

This is the Privacy Policy of EasyRecruitUK.com Limited. In this document, “we”, “our”, or “us” refers to EasyRecruitUK.com Limited.

Our register company number is SC338791 registered in Scotland, United Kingdom. Our registered office address is noted in the footer below.

## Introduction

The law requires us to tell you about your rights and our obligations to you with regards to the processing, recording and control of your personal data. In addition to the information we will provide within this policy, we request that you read the information provided by the Information Commissioner’s Office (ICO): Data Protection for the Public. [ICO DP For the Public](#)

Our policy complies with UK law including that required by the EU General Data Protection Regulation (GDPR) which comes into effect on the 25-May-2018. [GDPR EU 2016/679](#)

The policy sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It also describes options we provide for you to access, update or otherwise take control of your personal data that we process. It covers information that could identify you (“personal information”) and information that may not. In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information.

We aim to preserve the confidentiality of all information you provide to us, and hope that you reciprocate. Except as set out below, we do not share, sell or disclose to any third-party, any information collected through our website and recruiting processes. We will not disclose your personal data for any reason other than the information which is directly relevant to the recruitment process or as required by law.

## The bases on which we process information about you

All organisations, regardless of size require to keep & maintain certain personal information records, some because the law requires them, and some for internal purposes. For instance, keeping records of hours worked by most workers (for the purposes of the implementation of the Working Time Regulations), and pay rates (for the Minimum Wage Act 1998, tax and national insurance obligations) will enable employers to monitor legislation compliance.

The law requires us to determine under which of six defined bases we process different categories of your personal information and to notify you of the basis for each category. If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data. In the event that the basis changes, then we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

## What Information do we collect about you?

We collect personal data about you when you register online through our Website Talent Bank page [Register Online](#) or during the interviewing and application process.

We do so in order to act on your behalf to provide you with recruitment services that will source and identify assignment opportunities with our Clients as well as for administrative purposes.

The personal data that we collect includes your name, email address and telephone number along with other key pertinent information. If you are a work seeker we will also ask for details of the kind of work you are looking for and your preferred work location. If you decide to upload a CV (or Employment History), Skills or personal work information we will keep that information for as long you are employed via EasyRecruitUK.com Limited and for relevant legislative record-keeping timeframes which are defined later in this policy.

## How we collect your personal data

You may give your personal details to the Company directly, such as by seeking services from us, via an online application or submitting your CV.

We may collect your details from third-party publicly available sources such as LinkedIn, CV Library or a similar website, this information may include your professional history, full name, email address or telephone number ("contact data") where you have posted your CV for recruiters to consider you for opportunities). We may do this where we identify that you are suitable for an available vacancy

In some circumstances, your personal details may have been provided to us by another person for us to offer our services to you, e.g. a referral from one of our clients.

We may obtain your personal data from the following sources (not exhaustive):

- ❖ You (e.g. a Curriculum Vitae, application/registration form) where you have provided us with information for the purposes of using our Recruitment Services
- ❖ A Client
- ❖ Other candidates (recommendations/referrals)
- ❖ Online jobsites
- ❖ Marketing databases
- ❖ Social Media
- ❖ During the Interview & Application process
- ❖ Conversations on the telephone (which may be recorded)

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- ❖ Notes following a conversation or meeting
- ❖ Our websites and software applications

## How we use your personal data

Where you have given us consent to process your information for the purposes detailed above, we will enter the personal data into our recruitment CRM database (“Insight247”). ([Click Here](#))

We may also process your profile data in relation to job vacancies that you have applied for, generally processing any job applications, facilitating the recruitment process and furthering our relationship with you. The legal basis for this processing is our legitimate interests in finding an appropriate person for a particular role or assignment.

We will process your personal data in the context of our service provision to the third-party or Client with whom you are assigned work and as part of our Recruitment Services.

### Processing may include:

- ❖ Collecting and storing your personal data, whether in manual or electronic files
- ❖ Using the data to communicate with you
- ❖ Sending information to third parties or Clients with whom we have or intend to enter into arrangements which are related to our Recruitment Service provision
- ❖ Actions necessary to further any obligation on us pursuant to a contract between ourselves and the third-party or Client you are assigned to
- ❖ Collating market or sector specific information and providing the same to our Clients
- ❖ Providing information to regulatory authorities or statutory bodies and our legal or other professional advisers including insurers
- ❖ Retaining records of our dealings with you and the work assignments you are given
- ❖ Establishing quality, training and compliance with our obligations

## Purpose of Processing and Legal Basis

The legal bases we rely upon when providing and/or offering to provide these services to you are that we must comply with a number of statutory provisions when providing our Recruitment Services, which necessitate the processing of personal data.

These include the Conduct of Employment Agencies and Employment Businesses Regulations 2003, which amongst other things requires us to:

- ❖ Verify your identity
- ❖ Assess your suitability for an external job role
- ❖ Maintain records for specific periods

We are also required to comply with statutory and regulatory obligations relating to business generally, for example modern slavery, labour provision, tax, bribery and fraud/crime prevention legislation, and co-operating with various regulatory authorities such as UK Visas and Immigration, HMRC, ALP, GLAA & ICO.

We require to process personal data with respect to our contractual obligations to our third parties and Clients in the provision of our services including work-finding, recruitment, training and processing payroll.

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In addition, we require to process personal data for marketing and public relations in relation to our services for the following reasons;

- ❖ Maintaining an electronic backup of our system, solely for the purpose of disaster recovery after a main system failure or security breach
- ❖ For statistical purposes that allow for analysis of Key Performance Indicators (KPI's).
- ❖ To monitor Equality and Diversity
- ❖ To prevent modern slavery through our commitment to Stronger Together
- ❖ Addressing any query or dispute and exercising or defending any legal claims
- ❖ Protecting our reputation
- ❖ Evaluating quality and compliance including compliance with this Privacy Policy
- ❖ Determining staff training and system requirements
- ❖ Where required for the role to process information in relation to any criminal convictions.
- ❖ To improve the recruitment services we offer
- ❖ Sourcing potential opportunities and assessing the suitability of candidates
- ❖ Contacting you regarding potential opportunities and/or our services
- ❖ Collate market information or trends including providing analysis to potential or actual Clients and third-party partners

We may continue to process your personal data for as long as we consider necessary for the purposes of commercial viability and to pursue these legitimate interests.

## Consent

We may process your personal data on the basis that you have consented to us doing so for a specific purpose, for example, if you have provided your contact details and key information via the online Website (Talent Bank) page [Register Online](#) or during the interviewing and application process in order that we may use these to provide you with details of our services or in acting on your behalf to identify & assign work opportunities

In other circumstances, you may have provided your written or verbal consent to the use of your data for a specific reason such as obtaining/requesting references from other sources or third parties.

You may withdraw your consent to our processing of your personal data for a particular purpose at any stage. However, please note that we may continue to retain, or otherwise use your personal information thereafter where we have a legitimate interest or a legal or contractual obligation to do so.

Our processing in that respect will be limited to what is necessary in furtherance of those interests or obligations. Withdrawal of consent will not have any effect on the lawfulness of any processing based on consent before its withdrawal.

## Recipients of Data

We shall not share your personal information unless we are entitled to do so.

We will only share your personal data as necessary to Clients and third-party entities to provide the services as requested or as needed on your/our behalf, insofar as reasonably necessary in relation to potential job vacancies, and in the process of representing you to Clients and third parties who may have an appropriate vacancy for you and administering any work assignment.

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The categories of “Recipients” which we may share your personal information include, but are not limited to:

- ❖ Individuals, Clients and other third parties necessary for the provision of our Recruitment Services, including Individuals and organisations who hold information related to reference contacts you provide
- ❖ Any regulatory authority, independent auditors or statutory body pursuant to a request for information or any legal obligation which applies to us
- ❖ Clients or third parties who process data on our behalf where you are taking part in the recruitment process and/or you accept an offer of an assignment and/or you undertake an assignment
- ❖ Third-party, where necessary to protect your vital interests (e.g. emergency services)
- ❖ IT support & software providers
- ❖ Storage service providers including cloud sites
- ❖ Insurers, Pensions Providers, Legal and professional advisers
- ❖ Third-party company at your request, such as landlords or alternative prospective employers where you have requested us to act as a referee for you
- ❖ We may transfer your personal information to a third-party as part of a TUPE transfer under The Transfer of Undertakings (Protection of Employment) Regulations 2006;
- ❖ Training provider where you are undertaking any training services provided by us;

Where we share your personal data with any “Recipient”, we will ensure this processing is protected by appropriate safeguards including a suitable data processing agreement or contract with that Client and/or third-party requiring them to treat your information as confidential and ensure the continued protection of your data whilst in their possession as the “Processor” of that personal data.

These Clients and third-party entities are subject to strict data processing terms and conditions (GDPR Articles #28 & #32) and are prohibited from utilizing, sharing or retaining your personal data for any other purpose than as they have been specifically contracted for (or without your consent).

Your personal data will be stored on our servers which are within the European Economic Area.

## Overseas Transfers

The Company will not transfer any information you provide to us to countries outside the European Economic Area (‘EEA’). The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

Whenever your data is shared within the EEA, we will take every step possible to ensure adequate protections are in place to ensure the security of your information.

Should the company intend to change this process you will be notified in advance.

## Automated Decision Making

The company does not use automated decision-making, including profiling. Should the company intend to change this process you will be notified in advance.



## Your Rights

Please be aware that the GDPR articles include the following rights for individuals:

- ❖ The right to be informed – You have the right to know what information we hold about you, what we are using it for, who we are sharing it with, how long we are keeping it and on what basis we are processing the data.
- ❖ The right of access – If you would like to see the records we hold on file for you
- ❖ The right to rectification – If you believe we are holding incorrect information.
- ❖ The right to erasure – You can ask us to remove your information from our records.
- ❖ The right to restrict processing – You can ask us to stop processing it.
- ❖ The right to data portability – If you want to take your data to another organisation
- ❖ The right to object – You have the right to object to your data being processed.
- ❖ The right not to be subject to automated decision-making (including profiling) – You have the right to object to automated decision-making.

Where you have consented to the Company processing your personal data and sensitive personal data you have the right to restrict or withdraw that consent at any time by completing our on-line “Subject Access Request” form or emailing Data Protection Officer at:

[compliance@easyrecruituk.com](mailto:compliance@easyrecruituk.com)

## Data Access, Restriction and Retention

### Access to your personal information

At any time, you may review or update personally identifiable information that we hold about you, by completing the “Change of Personal Details” form on our website. ([Click Here](#))

Alternatively, by contacting your respective Client Service Manager, HR Department and/or our Payroll Department with any pertinent data which requires to be updated.

To obtain a copy of any personally identifiable information, you may send us a request via the online “Subject Access Request” form on our website at [www.easyrecruituk.com](http://www.easyrecruituk.com) or directly via email to our HR Department at [hr@easyrecruituk.com](mailto:hr@easyrecruituk.com).

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting your request or otherwise taking any action. This is important to safeguard your information.

After receiving the request, we will acknowledge the request within 3 working days telling you when we expect to provide you with the information, and whether we require any fee for providing it to you. We must provide you with the requested information no later than one month from the request date as per Article #12(3) of the EU General Data Protection Regulation (GDPR). ([GDPR EU 2016/679](#))

Note that the Data Protection Act does not limit the number of subject access requests an individual can make to any organisation. However, it does allow some discretion when dealing with requests that are made at unreasonable intervals. The Act says that we are not obliged to comply with an identical or similar request to one that has already been dealt with, unless a reasonable interval has elapsed between the first request and any subsequent ones.

Note that under normal circumstances, requests for information will be provided freely, although Organisations are permitted to charge a “reasonable fee” when a request is considered manifestly unfounded, excessive or repetitive. This fee will be based on the administrative cost of providing the requested information.

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The below table provides you with the timescales for the key Subject Access Request requirements:

Data Subject Request	Timescale
The right to be informed	When data is collected (if supplied by data subject) or within one month (if not supplied by data subject)
The right of access	One month
The right to rectification	One month
The right to erasure	Without undue delay
The right to restrict processing	Without undue delay
The right to data portability	One month
The right to object	On receipt of objection
Rights in relation to automated decision making and profiling.	Not specified

We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

The process of responding and acting on the Subject Access Request will be done in compliance with the ICO Subject Access Code of Practice. ([SAR code of practice](#))

### Retention of your personal information

The Company will retain your personal data and/or sensitive data only for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Different laws require us to keep different data for different periods of time.

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- ❖ To provide you with the services you have requested;
- ❖ To comply with other law, including for the period demanded by our tax authorities;
- ❖ To support a claim or defence in court.

Details of retention periods for different aspects of your personal data can be requested from us. However, we are legally required to keep basic information about your personal data (including contact, identity, financial and transaction data) for six years plus the active financial year after you cease engagement, for tax purposes.

We may also anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes. We can use anonymised information indefinitely without further notice to you.

In most circumstances your data will not be retained for more than six years (plus the active financial year) from the last point at which we provided any services or otherwise engaged with you and it is our policy to only store your personal data for as long as is reasonably necessary for us to comply with our legal obligations and for our legitimate business interests.

However, we may retain data for longer than a six year period (plus the active financial year) where we have a legal or contractual obligation to do so, or we form the view that there is otherwise a continued basis to do so, for example where your personal information identifies specialist skill sets which may remain in demand, or we are subject to a legal obligation which applies for a longer period.

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## Restriction of your personal information

Instead of asking for certain personal information to be removed (erased), as a data subject, you may ask us to stop processing all or certain data, but you will let us keep it. We will be required to inform all recipients of the data that they should stop processing (where it is reasonable for us to be expected to do so).

Please note that some personal data must be maintained as part of record-keeping/retention to comply with statutory and regulatory obligations relating to business generally. In the event that we cannot legally restrict personal data, we will provide an explanation along with the designated retention period.

## Complaints or Queries

If you wish to complain about this Privacy Policy or any of the procedures set out in it please contact the Data Protection Officer by emailing to [compliance@easyrecruituk.com](mailto:compliance@easyrecruituk.com)

If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation and/or arbitration.

If you are still in any way dissatisfied with how we process your personal information, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

This can be done at <https://ico.org.uk/concerns/> or by telephone on 0303 123 1113.

Alternatively, this can be done at any other relevant supervisory authority should your personal data be processed outside of the UK, when/if you believe that your data protection rights have not been adhered to.

## Review of this Privacy Policy

We may update this Privacy Policy from time to time as necessary and therefore you should re-visit this website and document on a regular basis to observe any incremental changes. In the event that significant changes occur, we will send out relevant information and direction to view the appropriate updates.

If you have any question regarding our Privacy Policy, please contact us as per the details in the sections above or via postal mail to the address below.

## Contact Details:

**Data Protection Officer**  
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