

DATA PRIVACY POLICY

This is the privacy notice of Working Smart Limited.

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). We'll also tell you about your privacy rights and how the data protection law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

1. WHO WE ARE AND IMPORTANT INFORMATION

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

3. HOW WE COLLECT YOUR PERSONAL DATA

4. HOW WE USE YOUR PERSONAL DATA

5. WHO WE SHARE YOUR PERSONAL DATA WITH

6. INTERNATIONAL TRANSFERS

7. DATA SECURITY

8. DATA RETENTION

9. YOUR LEGAL RIGHTS

10. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

11. QUERIES, REQUESTS OR CONCERNS

1. WHO WE ARE AND IMPORTANT INFORMATION

What is the purpose of this privacy notice?

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you register as a Job Seeker or for Job Alerts, or sign up for third party notifications of training and events that match your skills and expertise.

This website is not intended for children and we do not knowingly collect data relating to children.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Data controller(s)

Neil Stanley (Technical Director) is the Data Controller and responsible for your personal data (collectively referred to as WSL in this privacy notice). Our contact details are: Lansbury Estate, 102 Lower Guildford Road Knaphill Woking Surrey, GU21 2EP and our telephone is Tel: +44 (0) 1483 721794.

For all data matters contact Neil Stanley on neils@working-smart.co.uk

Neil Stanley is also responsible for this website.

Third-party links outside of our control

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](https://ico.org.uk/). <https://ico.org.uk/>

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes Name, Title, DOB, Gender
- **Contact Data** includes Address, Email address, contact details (phone, email, skype)
- **Registration Data for Job Seekers:** includes job title, current employer, skills, profile, keywords, nationality, DOB, CV, applications, cover notes and potentially other data as from time to time we deem important in the provision of our recruitment service.
- **Registration Data for Clients:** includes Name, job title, email address and contact details

NOTE: WE ALSO COLLECT, USE AND SHARE **AGGREGATED DATA** SUCH AS STATISTICAL OR DEMOGRAPHIC DATA FOR ANY PURPOSE. AGGREGATED DATA MAY BE DERIVED FROM YOUR PERSONAL DATA BUT IS NOT CONSIDERED PERSONAL DATA IN LAW AS THIS DATA DOES **NOT** DIRECTLY OR INDIRECTLY REVEAL YOUR IDENTITY. FOR EXAMPLE, WE MAY

AGGREGATE YOUR USAGE DATA TO CALCULATE THE PERCENTAGE OF USERS ACCESSING A SPECIFIC WEBSITE FEATURE.

NOTE: HOWEVER, IF WE COMBINE OR CONNECT AGGREGATED DATA WITH YOUR PERSONAL DATA SO THAT IT CAN DIRECTLY OR INDIRECTLY IDENTIFY YOU, WE TREAT THE COMBINED DATA AS PERSONAL DATA WHICH WILL BE USED IN ACCORDANCE WITH THIS PRIVACY NOTICE.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. However, for legal compliance, some Clients may request confirmation re criminal convictions.

If you fail to provide personal data

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with recruitment services we would need a copy of your CV and potentially “right to work” confirmation). In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

3. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you including through:

FOR EXAMPLE,

- **Directly for Job Seekers:** You may give us your data by filling in forms or by corresponding with us by phone, email or otherwise. This includes personal data you provide when you:
 - Apply for one of our job opportunities through our site or third party sites
 - Register or update an account on our website;
 - Subscribe to our Third Party Marketing Service;
 - Through social media – e.g. LinkedIn is our main professional source for indirect connection
 - Sign up for Job Alerts – our system will automatically alert/inform you of new job opportunities matching your registered preferences.
- **Directly for Clients or Potential Clients:** You may give us your data by filling in forms or by corresponding with us by phone, email or otherwise. This includes personal data you provide when you:

- The provision of business cards at events (e.g. technical conferences, exhibitions, networking...)
- New Client registration via our site, email or phone.
- Through social media – e.g. LinkedIn is our main professional source for indirect connection
- Media Partnerships – where WSL partner with 3rd parties such as conference organisers, industry focused societies...

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Performance of Contract** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Legitimate Interest** this means the interest of our business in conducting and managing our business to enable us to give you the best service and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by emailing info@working-smart.co.uk and outlining your request.
- **Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

NOTE: GENERALLY WE DO NOT RELY ON CONSENT AS A LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA OTHER THAN IN RELATION TO SENDING THIRD PARTY DIRECT MARKETING COMMUNICATIONS TO YOU VIA EMAIL. YOU HAVE THE RIGHT TO WITHDRAW CONSENT TO MARKETING AT ANY TIME BY FOLLOWING THE “OPT-OUT” INSTRUCTIONS BELOW.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us the Data

Administrator or Info@working-smart.co.uk if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To provide recruitment services to Job Seekers	<ul style="list-style-type: none"> • Identity Data • Contact Data • Registration Data 	Performance of a contract with you – e.g. – for the purpose of finding/alerting job seekers of potential job - for the purpose of relaying industry/3 rd party information
To provide recruitment services to Clients	<ul style="list-style-type: none"> • Identity Data • Contact Data • Registration Data 	Performance of a contract with you – e.g. - for the purpose of finding staff or consultants or other recruitment related services

NOTE: WE ALSO PROCESS **AGGREGATED DATA** SUCH AS SKILLS, DEMOGRAPHICS, AND SALARIES. AGGREGATED DATA MAY BE DERIVED FROM YOUR PERSONAL DATA BUT IS NOT CONSIDERED PERSONAL DATA IN LAW AS THIS DATA DOES **NOT** DIRECTLY OR INDIRECTLY REVEAL YOUR IDENTITY. FOR EXAMPLE, WE MAY AGGREGATE JOB SEEKERS SKILLS DATA TO PROMOTE SELECTED JOB SEEKERS CONFIDENTIALLY TO POTENTIAL EMPLOYERS.

NOTE: WITH YOUR WRITTEN PERMISSION, IF WE COMBINE OR CONNECT AGGREGATED DATA WITH YOUR PERSONAL DATA SO THAT IT CAN DIRECTLY OR INDIRECTLY IDENTIFY YOU, WE TREAT THE COMBINED DATA AS PERSONAL DATA WHICH WILL BE USED IN ACCORDANCE WITH THIS PRIVACY NOTICE.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Headhunting

By registering with us for the provision of recruitment services, you give us consent to use your Identity, Contact and Registration Data, to form a professional view on what jobs we deem may be of interest to you. This view is based on a vast array of your registration details (e.g. right to work, skills, experience, aspirations...).

However, with respect to you we have offered the option to be a passive or active job seeker. You can select and modify your option at any time through our web site. For example:

Active Job Seeker – I am happy for you to call me to discuss opportunities that you deem appropriate.

Passive Job Seeker – I am happy to receive the job opportunities but would prefer not to be called. If interested, I will respond to the headhunt email.

Job Alerts

By registering with us for the provision of our Job Alert service, you give us consent to use your Identity, Contact and Registration Data, to form a professional view on what jobs we deem may be of interest to you. This view is based on the selection criteria that you have registered and the criteria registered against the jobs posted on our site.

You can select and modify your Job Alerts at any time through our web site.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the WSL group of companies for marketing purposes.

Opting out

Third Party marketing - Job Seekers: You can ask us to stop sending you marketing messages at any time by:

- a) By logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences
- b) By following the opt-out links on any marketing message sent to you

Third Party marketing - Clients: You can ask us to stop sending you marketing messages at any time by:

- a) By following the opt-out links on any marketing message sent to you
- b) Emailing info@working-smart.co.uk

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [[LINK TO YOUR COOKIE POLICY.](#)]

Change of purpose

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact Neil Stanley at neils@working-smart.co.uk

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. WHO WE SHARE YOUR PERSONAL DATA WITH

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties Service: e.g.
 - Professional advisers such as accounting services for the provision of payroll for Contractors.
 - HM Revenue & Customs, regulators and other authorities, who require reporting of processing activities in certain circumstances – e.g. For Contractors on payroll.
- SPECIFIC THIRD PARTIES – such as our Clients who we hold legal Terms and Conditions with. When you apply for a job, you are consenting for us to share your personal details with our Clients for the specific role that you have applied for.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

Note: We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Many of our external third parties (i.e. Clients) are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, the same degree of protection is afforded to it as if it was internal to the EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

8. DATA RETENTION

We will only retain your personal data 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.

By law we may have to keep basic information about our clients/ Job Seekers (including contact, identity, financial and transaction data) for 7 [seven] years after they cease being Clients / Job Seekers for financial and legal regulatory purposes. For more information or clarification please contact info@working-smart.co.uk

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;

- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable (i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact Neil Stanley at neils@working-smart.co.uk

No fee required – with some exceptions

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee (in the region of £20 per request) if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

THIS PRIVACY POLICY WAS LAST UPDATED ON 16/5/18.

FROM 25 MAY 2018 THERE WILL BE CHANGES IN DATA PROTECTION LAWS AND WE MAY NEED TO UPDATE THIS POLICY FURTHER.

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

11. QUERIES, REQUESTS OR CONCERNS

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our Data Controller, Mr Neil Stanley at neils@working-smart.co.uk

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on +44 3031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.