

Hansonlawrie – Privacy Policy

Hansonlawrie is committed to good practice, safeguarding, professionalism and integrity in our HR and Recruitment business. We protect the privacy of our clients and candidates in ways that comply with legal and regulatory obligations and treat all dealings with us in the strictest confidence, whether through our website, on the telephone or through one of our face-to-face contact meetings.

How we may collect your data

We obtain personal data about you, for example, when:

- you request a proposal from us in respect of the services we provide;
- you, as a job seeker candidate (refer to our [Candidate Personal Data Statement](#)) or a client, engage us to provide our services to you and also for the duration of those services;
- you contact us by email, telephone, post or social media (for example when you have a query about our services); or
- from third parties and/or publicly available resources.

The kind of Information we hold about you

The information we hold about you may include the following:

- your personal details (such as your name; address, contact telephone number, email address);
- details of contact we have had with you in relation to the provision, or the proposed provision, of our services;
- details of any services you have received from us;
- our correspondence and communications with you;
- information about any complaints and enquiries you make to us;
- information from research, surveys, and marketing activities;
- information we receive from other sources, such as publicly available information, information provided by you, your employer, our clients or information from our networking affiliated organisations.

How we use Personal Data we hold about you

We may process your personal data for purposes necessary for the performance of our contract with you, as a job seeker candidate or a client, and to comply with our legal obligations.

In line with our [Candidate Personal Data Statement](#).

We may process your personal data for the purposes necessary for the performance of our contract with our clients. This may include processing your personal data where you are an employee, temporary worker, subcontractor, supplier or customer of our client.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, statistical and management purposes.

We may process your personal data for certain additional purposes with your consent, and in these limited circumstances where your consent is required for the processing of your personal data then you have the right to withdraw your consent to processing for such specific purposes.

Please note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

Situations in which we will use your personal data

We may use your personal data in order to:

- carry out our obligations arising from any agreements entered into between you, as a candidate or client and us (which will most usually be for the provision of our services);
- carry out our obligations arising from any agreements entered into between our clients and us (which will most usually be for the provision of our services) where you may be a subcontractor, temporary worker, supplier or customer of our client;
- provide you with information related to our services and our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes;
- seek your thoughts and opinions on the services we provide; and
- notify you about any changes to our services.

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations.

We may also process your personal data without your knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

We do not use automated processes to make decisions.

Data retention

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- the requirements of our business and the services provided;
- any statutory or legal obligations;
- the purposes for which we originally collected the personal data;
- the lawful grounds on which we based our processing;
- the types of personal data we have collected;
- the amount and categories of your personal data; and
- whether the purpose of the processing could reasonably be fulfilled by other means.

Change of purpose

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

Data sharing

Why might you share my personal data with third parties?

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

Which third-party service providers process my personal data?

“Third parties” includes third-party service providers. The following activities are carried out by third-party service providers: payroll, IT and cloud services, professional advisory services and bodies (Accountants and qualification checks), administration services, marketing services and banking services.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal data with other third parties, for example a regulator or to otherwise comply with the law.

Transferring personal data outside the European Economic Area (EEA)

Where your personal data is transferred outside of the EEA, we will ensure that either:

- the European Commission has made an "adequacy decision" with respect to the data protection laws of the country to which it is transferred, or
- we have entered into a suitable data processing agreement with the third party situated in that country to ensure the adequate protection of your data. Transfers outside of the EEA will be protected by appropriate safeguards.

You acknowledge that personal data that you submit for publication through our services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

Data security

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

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

Your rights in connection with personal data

Under certain circumstances, by law you have the following rights, in line with the Information Commissioners (ICO's) guidelines (these can be located <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr>). These are:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully;
- Request correction of the personal data that we hold about you;
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below);
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this basis. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights, please email our data protection point of contact sam@hansonlawrie.co.uk.

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 fee if your 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 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 another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

To the extent that the legal basis we are relying on for processing your personal data is consent, you are entitled to withdraw that consent at any time. To do so please contact sam@hansonlawrie.co.uk. This does not affect the lawfulness of processing based on your consent before you withdrew it; and you have the right to complain to the ICO if we have been unable to resolve your query.

Complaining to a supervisory authority

If you think that our processing of your personal data infringes data protection laws, you can lodge a complaint with a supervisory authority responsible for data protection or the Information Commissioners Office - <https://ico.org.uk/concerns/>.

Other websites

Our Website contains links to other websites. This privacy policy only applies to the **Hansonlawrie** Website, so when you link to other websites you should review their own privacy policies.

Changes to our Personal Data Statement

Any changes we may make to our privacy notice in the future will be updated on our website. This privacy notice was last updated on 20th May 2018.



How to contact us

Please contact us if you have any questions about this statement or information we hold about you:

Our data protection officer's contact details are: **Samantha Hanson** - Director, who can be contacted via email: sam@hansonlawrie.co.uk . or Telephone 0121 272 2957

Or write to us: Samantha Hanson, Data Protection Officer, **Hansonlawrie**, Suite 44, Pure Offices, Lake View House, Tournament Fields, Warwick. CV34 6RG (Registered in England and Wales. Company Reg. No. 09881728)

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