

Interpersonnel (HR) Ltd Privacy Notice - May 2018

Introduction

Interpersonnel (HR) Ltd, as part of the preparation for the General Data Protection Regulation (GDPR) coming into force on 25 May 2018, wants to ensure you are clear about what data we are collecting and what it is used for.

Interpersonnel (HR) Ltd is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you in accordance with the GDPR. It covers all aspects of Interpersonnel (HR) Ltd's work.

We may amend this privacy notice from time-to-time so please check this regularly. This policy was updated on 25th May 2018.

Contacting us

Data Controller/contact details

- i. For the purposes of the relevant data protection legislation, we are the controller of your personal data and we will use your personal data in accordance with this privacy notice.
- ii. If you wish to correct your personal data held by Interpersonnel (HR) Ltd or to opt out at any time from receiving marketing materials such as an e-letters/updates, please either email us at info@interpersonnelonline.com or use the 'opt out' option within such materials.
- iii. If you wish to contact us in relation to processing of your personal data please contact us on info@interpersonnelonline.com
- iv. We do not have a Data Protection Officer however we have a designated Director who is responsible for all data matters. You may contact that person on info@interpersonnelonline.com

Personal Data collected by us

- i. Email addresses that may be collected through you providing them to us at workshops, through email exchange, and via our website.
- ii. Through HR consultancy work for clients. Dependent upon the client work, this may include special categories of data such as health.
- iii. Communication data relating to the method of communication such as email and telephone contact details.

How we collect your data

We collect your data from the following sources:

i. Directly from you via yourself, our website, email or telephone. This may include personal data you provide through:

- requesting general information about services
- asking to be put on our e-mailing list
- completing a survey from us
- requesting a proposal
- emailing us.

ii. Automated technologies such as cookies, server logs or similar technologies.

iii. Third parties, for example:

- advertising networks
- other consultants
- clients
- other professional advisers.

How do we use your data?

We have set-out below the purposes for which we may process your personal data and the legal basis for that processing. We may be reliant upon one or more legal bases for that processing:

i. To inform you of any particular topic areas that may be of interest to you and how we help you with those areas should you wish. To deliver products and services, and to measure the success of the communication campaign.

This processing is required for the purposes of legitimate interests carried out by us, except where this is overridden by your interests or fundamental rights and freedoms requiring protection of personal data.

ii. To deal with your enquiries or sending you the requested information.

This processing is required for the purposes of legitimate interests carried out by us, except where this is overridden by your interests or fundamental rights and freedoms requiring protection of personal data.

This processing is required for the performance of a contract to which you are a party or in order to take steps of at your request prior to entering into a contract.

iii. To deal with client work that may include areas such as delegate contact details for workshops and investigations following incidents or complaints in the client's workplace. This may include compliance with our own legal obligations, for example, any employment legislation such as health and safety, contract, employment rights, fraud, and any assistance in an investigation (for example from the Police or other legislative body).

This processing is required for the purposes of legitimate interests followed by us or the third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.

This processing is required where there has to be compliance with a legal obligation to which we are subject.

This processing is required to protect the interests of the data subject or of another natural person.

iv. Where you have submitted a job application for a client. We may store your data for future reference should another suitable vacancy become available. In any event, this data will be destroyed one year after the close of the selection process.

This processing is required for the purposes of legitimate interests pursued by us or the third party (for example, our client), except where such interest are overridden by your interests or fundamental rights and freedoms which require protection of personal data.

v. To help us develop and update our website, develop and improve our campaigns to ensure they are serving you better, to identify usage and trends, and for our internal use including: analysis of use, uptake for e-communications, research, analysis, monitoring, risk management and administration. To develop our marketing strategy.

This processing is required for the purposes of legitimate interests pursued by us or the third party (for example, our client), except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.

vi. To be compliant with our own legal obligation such as health and safety or to help with an investigation, for example, from the Police.

This processing is required for compliance with a legal obligation to which we are subject.

vii. We may need to hold some Special Categories of data through, for example, a client contract. This may include, for example, health (for example to enable us to advise the client on any required health assessment as determined by health and safety legislation).

You have given us explicit consent to the processing of such Special Categories of data for the purpose. You may withdraw this explicit consent at any time but we may be unable to carry-out our duties in such event.

This processing is required for compliance with a legal obligation to which we are subject.

viii. We may disclose your personal data to:

- HMRC, other regulatory bodies who request your personal data or to report any potential or actual breach of applicable law or regulations;
- the client where they are your employer. For example, in the interest of any on-going investigation and the finding, or to ensure compliance with employment law;
- law enforcement agencies, immigration authorities, courts including and employment tribunals, customs and excise and any other relevant party, to the extent necessary for the establishment, exercise or defence of legal rights;
- third parties where required for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties;
- third parties who are considering or have decided to buy some or all of our assets or shares, or merge with us or with whom we may transfer the business (including where reorganisation, dissolution or liquidation may occur).

Personal data about other people you provide to us

i. Where you provide personal data to us about another person, you must ensure you are allowed to disclose that personal data to us and, without us taking any further action, we may collect, process, store and disclose that personal data as detailed in this privacy notice.

The individual concerned must be made aware by you of the information within this privacy notice as those matters relate to that person including our identity, how to contact us, how we collect and process personal data, our personal data disclosure practices, the individual's right to access the personal data and make a complaint about the handling of said personal data, and the consequences if the personal data is not provided.

Personal data - accuracy

i. It is important that the personal data we hold is current and accurate. We will take all reasonable precautions to ensure this is the case, but will not take responsibility for verifying the accuracy of personal data provided by you. Please keep us informed of any changes to your personal data. We will not be responsible for the loss arising from inaccurate, deficient, incomplete, or in authentic personal data provided to us by you.

Transfer of data outside the European Economic Area (EEA)

i. Where the client, your employer, is based outside the EEA, it may be the case that your personal data is transferred, processed and stored outside the EEA. For example, where the employer is a parent company based in the US but the client's office we are dealing with is based in the UK.

In any other event, it is not envisaged that personal data will be transferred, processed and stored outside the EEA.

How long do we store your personal data?

- i. All personal data is kept for the minimum period as determined by the relevant legal obligations or the recommended retention periods.
- ii. In relation to any other personal data, we will store that personal data for six years from the date of any final actions taken with regard to that personal data.
- iii. We will carry-out an annual review of personal data held and take any appropriate action.

Provision of personal data by you - contractual or statutory requirements

- i. In certain circumstances the provision of personal data is required by you:
 - legal compliance of, for example, with the contract
 - necessary to enter into a contract
 - where you must be legally compliant in providing the personal data, where you fail to do so, we may be unable to fulfil our service to, for example, the client who is your employer
 - where you choose not to provide us with the necessary personal data and we have an agreed contract, it may be that we are unable to fulfil or perform to the level expected under said contract.

Data subject's rights relating to personal data

You have the right to:

- i. Withdraw consent either by contacting us on the email provided within this document or by choosing the 'opt out' key on the e-newsletter.
- ii. Request access to personal data held by us. In this case, please apply in writing (this includes via email) outlining what you wish to have access to.
- iii. Rectification to any inaccurate personal data or the completion of incomplete data.
- iv. Request, on legitimate grounds as specified in law:
 - erasure of your personal data that we have collected, stored and processed, or
 - restriction of processing of your personal data that we have collected, stored and processed.
- v. Object or lodge a complaint, on legitimate grounds regarding the processing of your personal data.

Please contact on info@interpersonnelonline.com if you require any further information.

25 May 2018