

Privacy Policy

CMLR Horizons Limited T/A Charity Horizons

CMLR Horizons Limited ("Charity Horizons", "we", "our" and "us") are committed to ensuring that your privacy is protected. By using our website (www.charityhorizons.co.uk) you are agreeing to be bound by this Policy. You can be assured that any information we ask you to provide on our website will only be used in accordance with this Privacy Policy.

If you use our website or send/receive communications to/from us, you should regularly check this page as this policy may be changed or updated. You should read this Privacy Policy to understand what we are doing with your personal data, the basis on which we undertake such use, who we share your data with and your rights in relation to your personal data.

This Privacy Policy applies to the personal data of our website users, candidates, clients, suppliers, and other people whom we may contact in order to find out more about our candidates. "**Personal data**" is any information that relates to an identifiable natural person. Your name, address and contact details are all examples, if they identify you. The term "**process**" means any activity relating to personal data, including (for example) its collection, storage, transfer or other use.

This policy:

- sets out the types of personal data that we collect about you
- explains how and why we collect and use your personal data
- · explains how long we keep your personal data for
- explains when, why and with who we will share your personal data
- sets out the legal basis we have for using your personal data
- explains the effect of refusing to provide the personal data requested
- explains the different rights and choices you have when it comes to your personal data
- explains how we may contact you and how you can contact us.

What personal data do we collect about you?

Candidates: We collect and use only the personal information necessary to be able to find the best available opportunities and any further information needed to assess your eligibility through the different stages of recruitment. Personal information refers to any information that can identify an individual. This information includes CVs, identification documents, educational records, work history, employment and references and financial information with regards to salary.

The information we may collect includes:

- Name
- Address
- Date of Birth
- Email address
- Telephone number
- NI number
- Work history



- Salary expectations
- Payment records including tax records
- Qualifications
- Passport or visas
- DBS check results
- References

We may also collect sensitive personal data about you, related to your health, diversity information or details of any criminal convictions. We only collect sensitive personal data from you, and further process this data, where you have given your explicit consent.

Clients: We collect and use only the information necessary to provide you, with services such as finding the best available candidates for your vacancies.

Website Users: We collect and use only the information necessary to improve your experience when using our website. This may include browser and usage information, Internet protocol (IP) address, browser type and date and time of Website access.

Where do we collect personal data about you from?

Depending on your use of the website and any interactions with us, we will collect and/or receive information:

- Directly from you e.g. where prompted to provide such information or when you contact us, including through our website;
- Through publicly available sources- e.g. Social Media: LinkedIn/ Facebook/ Twitter
- Job boards
- Word of mouth or by 'referral'- e.g. you may be recommended by a friend, a former employer, a former colleague or a present employer.

Where we collect your information through publicly available sources as set out above, we may do this with the aid of third party software, such as Broadbean, using defined parameters on the specific requirements of a role. Such software is designed to only output information on candidates that meet the search criteria. The parameters of this software is restricted to only searching for candidate information from public sites where there is a reasonable expectation that such information may be collected and further processed by job recruiters for the purpose of sourcing candidates for available roles.

How do we use your personal data?

Candidates: We use your personal data to match your skills and experience with a potential employer. We will initially collect basic information such as contact details, job history and experience which then may be passed to the client. If you are selected by the client, we will collect more information from you at the interview (or equivalent) stage and onwards in that manner. We may use your data to send you information that you may find interesting, such as suggesting other jobs to you.

Clients: We use your personal data to ensure that we can find the right candidates for the opportunities that you may have, or for contractual obligations.

Suppliers: We use your personal data to ensure that we can contact you and for contractual obligations.



How long do we keep your personal data for?

We will only retain your information for as long as is necessary for us to use your information as described above or to comply with our legal obligations. However, we may retain some of your information after you cease to use our services, if we believe in good faith that it is necessary to do so in order to meet our legal obligations, such as retaining the information for tax and accounting or audit purposes.

We will keep your personal data for up to 3 years following registration. If we have not found a suitable role for you or engaged with you after 3 years, we will then contact you to check whether you would still like us to retain your information. If you do not reply, we will delete your data.

We will also retain your information for a period of 2 years from the last point of meaningful contact. Meaningful contact is where you have actively communicated, either verbally or in writing with us in relation to our recruitment services.

When determining the relevant retention periods, we will take into account factors including:

- our contractual obligations and rights in relation to the information involving legal obligation(s) under applicable law to retain data for a certain period of time
- statute of limitations under applicable law(s)
- (potential) disputes
- if you have made a request to have your information deleted
- guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

How and where we hold the information

All the personal data we store is securely held on our CRM databases on servers in Yorkshire and the North West. No data is stored on local workstations and any physical copy of data is in locked secured storage until such time as it is legally allowed to be destroyed.

Who do we share your personal data with?

Candidates: We share your personal data with clients who have suitable vacancies, in order to determine with the clients whether you are a suitable candidate for the organisation and role.

Clients: We share your data with candidates during the course of providing recruitment services to you, and with third parties as part of our contractual relationship.

Suppliers: We share your data with third parties as part of our contractual relationship.

What legal basis do we have for using your information?

For prospective candidates, contractors, referees and clients, our processing is necessary for our legitimate interests - we need this information in order to be able to assess suitability for potential roles, to find potential candidates and to contact clients, referees and suppliers.

If you are interviewed and submitted as a candidate, this may involve the processing of more detailed personal data including sensitive data such as health information that you or others provide about you. In this circumstance we will always ask for your consent before undertaking such processing.



What happens if you do not provide us with the information we request or ask that we stop processing your information?

If you do not provide the personal data necessary, or withdraw your consent for the processing of your personal data, we may not be able to match you with available job opportunities and represent you accordingly.

Do we use Cookies to collect personal data on you?

To provide better service to you on our websites, we use cookies to collect your personal data when you browse. See our **cookie policy here** for more details.

Do we transfer your data outside the EEA?

No

How do we store your personal details?

We record and store personal data in our paper files, mobile devices and on our computer systems (email, hard drives, and cloud facilities). This information can only be accessed by employees within Charity Horizons.

How do we safeguard your personal data?

We take the security of your data very seriously and have put in place appropriate measures that are designed to prevent unauthorised access to, or misuse of, your personal data.

Who has access to your information?

Employees within Charity Horizons will have access to your information. We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

Your rights in relation to your information

The accuracy of your information is important to us. Where we provide a service to you, the information will reflect your situation at that time and we will not normally update this; apart from a change of contact information or updating the CV documents we may have on file.

Data Protection Law provides you with a number of rights in relation to personal data, as summarised below:

Access – You may ask for a copy of the information Charity Horizons holds about you and we will provide this within one month of receipt free of charge.

Rectification – You may ask us to correct any information that we hold that is inaccurate or incomplete without undue delay.

Erasure – You may ask us to delete or cease processing data in certain situations. Please note that we will have regulatory obligations to retain information for certain time periods and we will retain such information as we believe is necessary to fulfil these obligations. The right of erasure under data protection law is not an absolute right as it only applies in relation to one or more specific circumstances. **Restrict processing** – You may ask us to cease processing information. This means that we will be able to retain it but no longer act upon it.

This is a brief summary of your rights and there may be restrictions on some of them. If you wish to explore any of these rights at any time, please contact us on the email address below and we will be pleased to assist you.



Complain – You have the right to lodge a complaint about the way we handle or process your personal data with the Information Commissioner's Office (ICO), which is the UK data protection regulator - details below.

Withdraw Consent - If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or
- further copies of the same information.

Please consider your request responsibly before submitting it and we will respond as soon as we can. Generally, this will be within one month from when we receive your request but if the request is going to take longer to deal with we will let you know.

Security precautions in place to protect the loss, misuse or alteration of your information.

When you give us personal information, we take steps to ensure that it is retained securely and processed in a confidential manner.

Information may be transmitted normally over the internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect all personal information, we cannot guarantee the security of any information that passes between us, and you should consider the risk of this. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or you have chosen) a password which enables you to access certain websites relevant to our services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

We also expect you to take reasonable steps to safeguard your own privacy when transferring information to us, such as not sending confidential information over unprotected e-mail, ensuring e-mail attachments are password protected or encrypted and only using secure methods of postage when original documentation is being sent to us.

Right to complain

If you believe that we are not holding your information correctly or are unhappy at any dealings with us regarding your information you may complain to the Information Commissioner's Office. You can do this via their website https://ico.org.uk/concerns or by calling 0303 123 1113.

Review of this policy

We will endeavour to keep this Policy under regular review. Last updated June 2020.

This website is created using yell.com and is subject to their terms of use. You can view the yell.com privacy policy by clicking the link <u>here.</u>

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible. We will promptly correct any information found to be incorrect.

Any questions regarding this Privacy Notice and our privacy practices should be sent by e-mail to leanne@charityhorizons.com