

Privacy Policy

Command Recruitment Ltd's online service is dedicated to protecting the privacy of our users. Our policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

Changes to Data Protection Policy

From the 25th of May 2018, we will be processing your personal data in accordance with the General Data Protection Regulations (GDPR). Up until that point we will continue to process your personal data in accordance with the existing Data Protection Act 1998 (DPA). This notice is written to comply with both the DPA and the GDPR.

Information Collection and Use

The choice to send your CV to us via our website is optional. This option is made available either to apply for specific roles advertised on the site or for consideration for future roles that may arise. Although your CV will be stored online, it will only be accessible by Command Recruitment Ltd employees.

You may give us information about you by filling in forms on our site, www.command.co.uk or by corresponding with us by phone, email or otherwise. This includes information you provide when you register to use our site.

A consultant will study your CV and if deemed that our services would be beneficial in aiding you source a new role your details will be registered onto our in-house database. Further information including your national insurance number, Right to Work and any qualification certificates may be required at this point to complete your registration.

The information you give us may include (but not be limited to) your name, address, email address and phone number, personal description, job history, qualifications and photographs.

If Command Recruitment Ltd successfully places you into a temporary role we will require you to supply us with your bank details. These bank details will be accessed by our payroll providers RSM UK www.rsmuk.com



In order to apply online for roles advertised on www.command.co.uk we do require you to enter a contact number and email address. This information is used purely as a means of contact in relation to recruitment services. If you don't wish to apply for roles online, you may call the office and state the job reference numbers you are interested in; one of our consultants will be happy to assist you.

Command Recruitment Ltd collects information from our users at several different points on our website.

Shared Information

Command Recruitment Ltd is the sole owner of the information collected on this site. We will not sell or rent this information to others.

Command Recruitment Ltd will pass on CVs to clients for potentially suitable roles without prior notice to the candidate and the candidate's contact details will remain anonymous. However, the candidate's name and career history will be displayed.

We may share aggregated demographic information with our clients. This is not linked to any personal information that can identify any individual person.

To comply with UK Law, we may also release information relating to you to regulatory or law enforcement authorities, if required to do so. If in the event that Command Recruitment Ltd merges or is acquired by another business, we may share the information that relates to you with the new owners of the business.

Where else may we get your Data from?

External CV Databases

As part of our service we may obtain your personal details and CV as from a number of different job boards or CV databases that we have access to. We use these details in order to match client vacancies we have against suitable candidates. As part of our internal processes for this service we will contact you prior to passing on your CV and details to potential employers. As appropriate you may ask us to remove or update the details we have obtained via these sources.



Why do we Collect this Information?

We collect information about you in order to provide you the best careers advice possible tailored to your specific preferences or experience. The information is also necessary for us and employers to match you against any opportunities that they have.

Where we Store your Personal Data

The data we collect from you is safely secured by our GDPR compliant Data Provider. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. By submitting your personal data, you agree that this will be processed by staff in accordance with legitimate business use in relation to recruitment and marketing.

Protection of Your Personal Data

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data through the use of security measure like the use of an SSL certificate, we cannot guarantee the security of your data transmitted to our site and any transmission is at your own risk.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access, including all necessary technical and organisational measure to protect your data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access and against all other unlawful forms of processing.

An employee who leaves the company no longer has access to the online or in-house databases.



Legal Basis for Processing Your Data

The legal basis for processing under GDPR is outlined below:

Candidate personal data held by us

Contractual necessity (Article 6(1)(b)), legitimate interest (Article 6(1)(f)) and consent Article 6(1)(a)

Client or employer related personal details held by us

Contractual necessity (Article 6(1)(b)), legal obligation (Article 6(1)(c) and legitimate interest (Article 6(1)(f))

Legitimate Interest

We may also process your data when it is in our legitimate interest to do so and the processing does not impact on any of your data protection rights. Our legitimate interests include:

- ensuring the security and integrity of our services and ensuring that our systems such as websites and apps work properly;
- selling and supplying services to our clients;
- protecting clients, employees and other individuals (including yourself) and maintaining their safety, health and welfare;
- the handling client and your contacts, queries, complaints or disputes; and
- fulfilling our duties to our clients, yourself, colleagues, shareholders and other stakeholders.

You have the right to object to the processing of your data under legitimate interest should you feel that such legal basis is not warranted or feel that it overrides any of the rights that you may have.

How Long We Keep Your Information For

Personal information, CVs and cover letters: for a maximum of 36 months after the last contact we had with you.

Employer/client related personal details: For the length of our relationship with you plus 6 years (Limitation Act (1980) in case the case where there may be a dispute. Some information may be required to be retained longer due to legal obligations (e.g. HRMC).



Links / Social Buttons on our Website

Our website contains links to other sites; please be aware that Command Recruitment Ltd is not responsible for the privacy practices of such other sites.

On many of the pages of our website you will see 'social buttons'. These allow you to share or bookmark pages on our site.

Social media sites such as Twitter, Google, Facebook, and LinkedIn may collect information about your internet activity, including if your visit to our site and the specific pages you are on if you are logged into their services, even if you don't click on the button.

You should check the privacy and cookies policies of each of these sites to see how exactly they use your information and to find out how to opt out, or delete, such information.

Further information

- 1. Facebook cookies www.facebook.com/about/privacy/
- 2. **Twitter cookies** <u>www.twitter.com/en/privacy</u>
- 3. Google cookies www.google.com/intl/en/policies/terms/
- 4. **LinkedIn cookies** <u>www.linkedin.com/static?key=privacy_policy</u>

If you would like more information on cookies, we recommend the <u>direct.gov.uk internet</u> <u>browser cookies page</u>.

Your rights over your information

By law, you can ask us what information we hold about you, and you can ask us to correct it if it is inaccurate.

You can also ask us to give you a copy of the information and to stop using your information for a period of time if you believe we are not doing so lawfully.

To submit a request by email, post or telephone, please use the contact information provided below.

In addition to the above you have the following rights under GDPR:

- The right to ask what personal data is held is free from the 25th May 2018.
- The right to ask to update and correct any out of date or incorrect personal data that we hold free of charge.
- The right to erasure of personal data where consent is the only legal basis for processing and that consent has been withdrawn.



- The right to data portability in the sense that personal data provided directly by the data subject is exportable in an open format like CSV where the legal basis for processing is based on either contract or consent.
- The right to restrict or object to the processing of your personal data where:
- You contest the accuracy of the personal data and the accuracy needs to be verified;
- You object to the processing under legitimate interest ground and consideration needs to be made whether our legitimate interest overrides that of the individuals;
- The processing was unlawful, and you request restricted processing over erasure;

You can withdraw consent at any time where consent has been relied upon. If consent is the sole legal basis for processing, we will stop processing the data after the consent is withdrawn. The data will then be placed in a restricted processing mode until you have asked to exercise your right to erasure or the personal data falls outside stated retention period (whichever comes first).

Correction/Updating Personal Information

If your personally identifiable information changes (such as office/home address), you will be able to edit or delete your personally identifiable information through logging into your online account through our website. Alternatively, you can contact the office on the details below and we will delete all of your personal data.

Our Communications with You

We will periodically communicate with you by email, post, telephone or device notifications for the purposes of delivering our services to you. The legal purpose for which is under the legitimate interest provision under both GDPR and the Privacy and Electronic Communications Regulations (PECR).

Contacting us

You may contact us for any of the described purpose above. Our main address is:

Office 36, 88-90 Hatton Gardens, Holborn, London, EC1N 8PN

You can contact us by post at the above address, or by via email at info@command.co.uk or by telephone on 0208 099 4903.



We are not required to have a data protection officer, so any enquiries about our use of your personal data should be addressed to the contact details above asking for the person responsible for data protection.

Changes to this privacy notice

If we decide to change our privacy policy, we will post those changes on our Website, so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users by way of an email. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy under which the information was collected.

If you have any questions regarding our Privacy Policy, please contact us at info@command.co.uk