

**BACKGROUND:**

Recruit Right HQ Limited (“the Company”) is a recruitment business which provides outsourced recruitment services to its clients and work-seekers. The Company must process personal data [(including special category or ‘sensitive’ personal data)] so that it can provide these services. In so doing, the Company acts as a data controller.

During the course of an application process a candidate will provide their details via job boards for the company to use as per the purpose it was provided. The Company must have a legal basis for processing your personal data. See below for more details. We will only use personal data in accordance with the terms of this notice for the purposes of providing outsourced recruitment services.

Where an individual uses the Contact Us function, the details will only be used for the purpose of providing these details in the first instance.

**1. Information About Us**

Recruit Right HQ is a limited company registered in Northern Ireland under company number NI698926.

All details are available from Companies House.

**2. What Does This Notice Cover?**

This Privacy Notice explains how personal data is used: how it is collected, how it is held, and how it is processed. It also explains rights under the law relating to any personal data given to the Company.

**3. What Is Personal Data?**

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

**4. What Are My Rights?**

Under the Data Protection Legislation, individual has the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.

- c) The right to have personal data rectified if any personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any personal data that we hold. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of personal data.
- f) The right to object to us using personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on given consent as the legal basis for using personal data, an individual is free to withdraw that consent at any time.
- h) The right to data portability. This means that, if personal data has been provided to us directly, we are using it with relevant consent or for the performance of a contract, and that data is processed using automated means, an individual can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of personal data or exercising any of the rights as outlined above, please contact us using the details provided in Part 11.

It is important that personal data is kept accurate and up to date. If any of the personal data we hold about an individual changes, they should keep us informed as long as we have that data.

Further information about rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

## 5. What Personal Data Do You Collect and How?

The Company will collect and hold some or all of the following personal data.

Data Collected	How We Collect the Data
CV’s	Through Job Applications
Contact information as per website contact form	Through the Contact Us Form
Monitoring Information	As per the Questions asked on Job Boards

You are under no obligation to provide the Company with data. However, if you do not provide certain information, we will not be able to provide the relevant service and may not be eligible for the relevant selection process.

## 6. **How Do You Use My Personal Data?**

The Company needs to collect and process data in order to complete the recruitment services offered. The only exception to this is where an individual contacts Recruit Right HQ using the contact form. In this situation, the company will solely use this for the purpose of contacting an individual as requested.

The Company will process your personal data for the purposes of fulfilling the designated recruitment process. This includes, for example, contacting you about roles you have applied for or may be suitable for, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, holding interviews and communication throughout the process with applicants.

In some cases, the Company may be required to collect and process your data for the purpose of investigating, reporting, and detecting crime, and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards. Monitoring information will be provided to Hiring Companies who have elected Recruit Right HQ' service to ensure they meet their requirements of the Equality Commission.

Information will be provided to the Hiring Company as required and by completing the process through Recruit Right HQ, it is therefore deemed consent has been provided for your details to be passed on, if required by the recruitment process.

The Company will only use your personal data for the purposes for which it was originally collected, unless we reasonably believe that another purpose is compatible with those original purposes and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purposes for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 7. **How Long Will You Keep My Personal Data?**

The Company will only hold your personal data for as long as is necessary to fulfil the purposes for which we collected it. This is most likely 12 months. After each campaign, the Monitoring Information is provided to the company as required. This is anonymised and will not be identifiable.

## 8. **How and Where Do You Store or Transfer My Personal Data?**

Data is stored in a range of different places, including on the relevant job boards and on the file system of Recruit Right HQ as required. This is held within the UK.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data by only providing data to the hiring company when required.
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

9. **Do You Share My Personal Data?**

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Clients of the Company.
- Any applicable legal or government authorities;

When your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

10. **How Can I Access My Personal Data?**

If you want to know what personal data we hold about you, you can ask us for details of that personal data and for a copy of it. This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month at the latest.

11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please contact [hire@recruitrighthq.com](mailto:hire@recruitrighthq.com).

12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.