

## Privacy Policy

This Privacy Policy describes the way in which Theorise deals with the information and data you provide to us to enable us to manage your relationship with Theorise.

We will process any personal information provided to us or otherwise held by us relating to you in the manner set out in this Privacy Policy. Information may be provided via the Theorise website (the "Website"), telephone calls, e-mails or any other means.

By accepting this Privacy Policy you agree that you understand and accept the use of your personal information as set out in this policy. If you do not agree with the terms of this Privacy Policy please do not use the Website or otherwise provide us with your personal information.

## Who we are

References in this Privacy Policy to "Theorise", "we", "us" or "our" relate to Theorise Limited, Westpoint, 4 Redheughs Riggs, Edinburgh, EH12 9DQ. We control the ways your Personal Data is collected and the purposes for which your Personal Data is used by Theorise, acting as the "data controller" for the purposes of applicable European data protection legislation.

## Contacting us

If you have any concerns, or would like more detail about how we process your Personal Data, you can contact us on 0131 338 6100.

## Protecting Your Personal Data

Your Personal Data isn't just protected by the quality, commitment and high standards of Theorise, it's also protected by law. The law states that we can only process your Personal Data when there is a genuine reason to do so and it must be one of the following:

- To fulfil any contract that we have with you
- We have a legal obligation
- Where you have consented to the processing
- When it is in our legitimate interest
- When it is in the public interest
- When it is in your vital interests

### Legitimate Interests

When we have a business or commercial reason to process your Personal Data this is referred to as a legitimate interest. Your Personal Data is still protected, and we must not process it in a way that would be unfair to you or your interests.

If we do use legitimate interests as a reason to process your Personal Data we will tell you that we are doing so, what our legitimate interests are and provide you with a method to raise any questions or objections you may have. However, compelling grounds for processing such information may over-ride your right to object.

### How long we keep your Personal Data

Whenever your data is kept by Theorise we will ensure that it is appropriately protected and only used for acceptable purposes.

We will keep your data for the period that you are registered with Theorise or working through Theorise or one of our clients.

If you no longer wish to be registered with Theorise, we will keep your data for the minimum length of time required to comply with the purposes set out in this policy and relevant legal or regulatory obligations. Your Personal Data may be kept longer if we cannot delete it for technical reasons.

### Why and How we process your Personal Data

#### Legal Basis for Processing – Initial Contact i.e. registration

Source of personal data	Forms to provide	Legitimate interests	Performance of a contract	Consent	Legal obligation
Face to face / walk-in / telephone	<ul style="list-style-type: none"> <li>Registration form</li> <li>DP5A – Privacy Statement</li> <li>Infographic 'Jobseekers – know your data protection rights'</li> </ul>	Yes, as agency provides work-finding services to individuals seeking work.	Only if clear that we can assist and provide terms at time of registration.	Yes, provided a) your consent is valid and b) we are aware that it can be withdrawn.	N/A
Candidate uploads CV or applies via job board					
Referral (e.g. by a friend)	<ul style="list-style-type: none"> <li>Registration forms</li> </ul>	Yes, as agency provides work-	N/A	Only if we have a positive	N/A

	<ul style="list-style-type: none"> <li>DP5B – Privacy Statement</li> <li>Infographic 'Jobseekers – know your data protection rights'</li> </ul>	finding services to individuals seeking work.		indication that you have consented to us contacting you.	
Agency finds individual via job board	<ul style="list-style-type: none"> <li>DP5B – Privacy Statement</li> </ul>	Yes, as provided the role is relevant.	N/A	Yes, as provided as per the T's & C's of the job board that the individual is happy to be contacted.	N/A
Agency finds individual via LinkedIn	<ul style="list-style-type: none"> <li>DP5B – Privacy Statement</li> </ul>	N/A	N/A	Yes, as provided via 'Career interests' that they are happy to be contacted.	N/A
Additional Documents				Form – DP6 Consent	

**Legal Basis for Processing – Ongoing Contact i.e. assigned to role, offered positions.**

Source of personal data	Performance of a contract	Consent	Legal obligation	Vital interests
Face to face / walk-in / telephone	Yes, as we will require to keep in touch with you in regard to the ongoing aspects of your assignments or future assignments and sharing your agreed data with clients.	Yes, if you have agreed to register with us for work opportunities you will be required to consent to be contacted. Any removal of consent will result in your removal from our database.	Yes, as required ongoing to process payroll and also needed for HMRC and DWP purposes.	N/A
Candidate uploads CV or applies via job board				
Referral (e.g. by a friend)	Yes, if you agree to registration or to be contacted by us. We will require to keep in touch with you in regard to the ongoing aspects of your assignments or future assignments and sharing your agreed data with clients.	Yes, if you agree to registration or to be contacted by us.	Yes, as required ongoing to process payroll and also needed for HMRC and DWP purposes if working for us or client.	N/A
Agency finds individual via job board	Yes, if you agree to registration or to be contacted by us. We will require to keep in touch with you in regard to the ongoing aspects of	Yes, if you agree to registration or to be contacted by us.	Yes, as required ongoing to process payroll and also needed for HMRC and DWP purposes if working for us or client.	N/A

	your assignments or future assignments and sharing your agreed data with clients.			
<b>Agency finds individual via LinkedIn</b>	Yes, if you agree to registration or to be contacted by us. We will require to keep in touch with you in regard to the ongoing aspects of your assignments or future assignments and sharing your agreed data with clients.	Yes, if you agree to registration or to be contacted by us.	Yes, as required ongoing to process payroll and also needed for HMRC and DWP purposes if working for us or client.	N/A
<b>Additional Documents</b>			Form – DP6 Consent	

If you choose not to provide your Personal Data it may prevent us from meeting legal obligations, fulfilling a contract, or performing services required to run your account. Not providing your Personal Data may mean we are unable to provide you with any work-finding services.

**Information Collected**

The information and data about you which we may collect, use and process includes the following:

- Information that you provide to us by filling in forms on the Website or any other information you submit to us via the Website, e-mail or face-to-face,
- Records of correspondence, whether via the Website, email, telephone, face-to-face or other means.
- Your responses to surveys or customer research that we carry out.
- Details of the work you have been assigned with our clients.
- Details of your visits to the Website including, but not limited to, traffic data, location data, weblogs and other communication data.

Where it is reasonable for us to do so and not detrimental to your rights and freedoms, we also collect Personal Data from publicly available sources such as internet searches, Companies House, and broadcast media.

**Telephone Calls**

Telephone calls to and from our Office may be recorded for training and security purposes.

### **Social Features of Our Products**

If you choose to participate in any of the social features that we provide with our products (such as blog posts) Theorise may store, record or otherwise process this data.

### **Use of Cookies**

To find out more about how we use cookies please see our cookie policy.

### **Personal Data we share with others**

We may share your Personal Data within Theorise and with these other organisations:

- Credit reference agencies
- Law enforcement agencies, regulators and other authorities
- Fraud prevention agencies
- Identity verification agencies
- Third parties you ask us (or permit us) to share your data with
- Third parties necessary to provide you services with Theorise including our clients, payroll company and our CRM system.

Where your Personal Data is transferred outside of the European Economic Area ("EEA"), we require that appropriate safeguards are in place.

We may also disclose personal information to other companies within associated or subsidiary companies and to business partners, or successors in title to our business.

### **Data Transfer Outside the EEA**

We will only transfer your Personal Data outside of the EEA where:

- You have given your explicit consent, or

- It is necessary for us to set up or fulfil a contract you have entered into with us; or
- To comply with a legal duty or obligation

If we do transfer your Personal Data outside of the EEA, within the group or to our business partners, we will take measures to ensure it is protected to the same standards as it would be within the EEA by relying on one of the following:

- The country that is receiving your Personal Data has been found by the European Commission to offer the same level of protection as the EEA. More information can be found [on the European Commission Justice website](#).
- We will use contracts that require the recipient to protect your Personal Data to the same standards as it would be within the EEA
- Where the transfer is to the USA and the recipient is registered with Privacy Shield. Privacy Shield is a framework that ensures Personal Data is protected to a level approved by the EU. Read more about Privacy Shield [on the European Commission Justice website](#).

In some instances we may be compelled by law to disclose your Personal Data to a third party and may have limited control over how it is protected by that party.

### **Your rights over your Personal Data**

We will assist you if you choose to exercise any of your rights over your Personal Data, including:

- Withdrawing your previously granted consent; however, this will not invalidate any previously consented processing
- Lodging a complaint with any relevant Data Protection Authority
- Access to your Personal Data that we hold or process
- Correction of any Personal Data that is incorrect or out of date
- Erasure of any Personal Data that we process
- Restrict processing of your Personal Data in certain circumstances
- Asking us to provide you or another company you nominate with certain aspects of your Personal Data, often referred to as 'the right to portability'
- The ability to object to any processing data where we are doing it for our legitimate interests
- The ability to contest a decision made entirely by automated processing, to express your point of view and to request that a human review the decision

For more information on these rights you can contact – [dany@theorise ltd.com](mailto:dany@theorise ltd.com)

### **Changes to our Privacy Statement**

We may update this policy from time to time, so please review it frequently.

If any material changes are made to this Privacy Policy we will use reasonable endeavours to inform you in advance by email, notice on the Website or other agreed communications channels. We will communicate the changes to you in advance, giving an appropriate amount of time for you to consider and understand the changes before they become effective.

We will not enforce material changes to the Privacy Policy without your express consent. If you decline to accept the changes to the Privacy Policy, or otherwise do not accept the changes within the time period, we may not be able to continue to provide our services.