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<b>Document Name:</b>	Privacy notice
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MHCL is a recruitment business which provides work-finding services to its clients and work-seekers. MHCL must process personal data (including sensitive personal data) so that it can provide these services – in doing so, MHCL acts as a data controller.

You may give your personal details to MHCL directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. MHCL must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

## **1. Collection and use of personal data**

### **a. Purpose of processing and legal basis**

MHCL will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities and developing and managing our services and relationship with you and our clients.

In some cases, we may be required to use your data for investigating, reporting and detecting crime and to comply with laws that apply to us. We may also use your information during internal audits to demonstrate our compliance with certain industry standards.

The legal bases we rely upon to offer these services to you are:

- Your consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have

## **b. Legitimate interest**

This is where MHCL has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where MHCL has relied on a legitimate interest to process your personal data our legitimate interests are as follows:

- Managing our database and keeping your work-seeker records up to date
- Contacting you as an individual to seek your consent where MHCL need it
- Providing work-finding services to you as an individual, including sending your information to our clients where you have demonstrated an interest in doing that particular type of work but not expressly consented to you passing on their cv
- Contacting you as an individual with information about similar products or services that you have used from MHCL recently

## **c. Recipient/s of data**

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

- Clients that we introductions to (within the Energy Industry or associated industries)
- Your former or prospective new employers that we can obtain or provide references to
- Other recruitment agencies in the supply chain, where applicable
- Our insurers
- Our legal advisers
- Our IT and CRM providers
- Any public information sources and third-party organisations that we may use to carry out suitability checks on work-seekers e.g. Companies House, the Disclosure and Barring Service (DBS)
- Government, law enforcement agencies and other regulators e.g. the Police, Home Office, HMRC, Employment Agencies Standards Inspectorate (EASI), Local Authority Designated Officers (LADOs), GLAA

## **d. Statutory/contractual requirement**

Where your personal data is required by law and/or a contractual requirement (e.g. our client may require this personal data), and/or a requirement necessary to enter into a contract. You are obliged to provide the personal data and if you do not the consequences of failure to provide the data are:

- We may not be able to introduce or supply you as a work seeker to a client

## **2. Data retention**

MHCL will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time.

The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

Where MHCL has obtained your consent to process your personal data we will do so in line with our retention policy. Upon expiry of that period MHCL will seek further consent from you. Where consent is not granted MHCL will cease to process your personal data.

### 3. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data MHCL processes on you
- The right of access to the personal data MHCL processes on you
- The right to rectification of your personal data
- The right to erasure of your personal data in certain circumstances
- The right to restrict processing of your personal data
- The right to data portability in certain circumstances
- The right to object to the processing of your personal data that was based on a public or legitimate interest
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time

Where you have consented to MHCL processing your personal data you have the right to withdraw that consent at any time by contacting MHCL contacts listed above.

There may be circumstances where MHCL will still need to process your data for legal or official reasons. We will inform you if this is the case. Where this is the case, we will restrict the data to only what is necessary for meeting those specific reasons.

If you believe that any of your data that MHCL processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

**You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.**

### 4. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact the names listed above.

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.