

Privacy Policy

Last update: 23rd January 2024

The purpose of this privacy notice is to tell you what personal information **32Recruit Group Ltd (known as 32Recruit)** collects from you, how and when it may be collected and how we use it in order for you to access and use our recruitment services.

Personal information refers to any information that can identify you as a living individual, such as name, address, email address, National Insurance number, telephone number, bank details etc. We will refer to this as “personal information” within this notice.

When this notice mentions “us”, “we” or “our” it refers to **32Recruit** who is responsible for your personal information under this agreement.

1. Information we collect

Recruitment businesses obtain personal data through a variety of sources. You may have applied for a role you had seen advertised by us, you may have registered with us directly via our website, or you may have uploaded your details to a job board or social networking site for job seeking purposes.

There are three main categories of information that we collect from you as detailed below.

1.1 Information you give to us

1.1.1 Information that is necessary to use our Recruitment Services

We ask for and collect the following information when you register as a candidate with **32Recruit**. This information is necessary for the adequate performance of a contract between you and us, and to allow us to comply with our legal obligations. Without it we will be unable to provide you with our recruitment services.

This information includes (without limitation);

- **General registration details** – when you register with **32Recruit** we require personal information such as your name, address, contact details etc. in order to be able to provide work seeking services to you
- **Work history** – in order to assess your suitability as a candidate for the vacancies we are working on with our clients we will need to receive information regarding your employment to date. This may include your CV, education, relevant qualifications and courses undertaken, your reference details and other information you feel is useful to tell us about yourself in regards to your job search
- **Pre-employment vetting** – As a recruitment business we are bound by the terms of the Conduct of Employment Agencies and Employment Businesses Regulations 2003, which requires us by law to collect and verify information regarding; individuals’ identity, suitability for a job vacancy and their right to work in the location the respective role is based.

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- **Enhanced vetting checks** – For certain positions we are working on we may need process other enhanced information about you which could include (but is not limited to) information about your physical and mental health and your criminal record to date. This is known as “sensitive personal information” and whilst we will keep all of your personal information secure, we will protect this to a higher level. These requirements are set and stipulated by the industries or organisations we are working with, or by the government.

1.1.2 Information you choose to give to us

On top of the information we require you to give to us to use our recruitment services; you may choose to give us additional information about you that enables us to tailor the services we provide to you. This additional information will be processed based on your consent.

- **Additional profile information** – this may include extra information regarding your skillset, your career highlights and achievements to date and your future ambitions including the type of employment you are seeking, the locations you wish to consider for this and the opportunities you would like to hear about from us.
- **Other information** – You may provide us with some other information when completing a form, responding to our surveys, or where you select and manage your marketing preferences.

1.1.3 Information that is necessary to on-board you for a work assignment

If you are seeking or are offered and accept a temporary work assignment through us then we will require further information from you in order for you to enter into this contract and to ensure you are paid accordingly. This can include, but is not exhaustive of; your bank account details, your National Insurance number or limited company information, your emergency contact details, equalities and diversity monitoring data and potentially some personal medical history which is necessary to fulfil our legal obligations to you and our clients.

1.2 Information we automatically collect from your use of our website

When you visit our website or social media platforms a small file is downloaded to your computer called a ‘cookie’. Cookies, alongside other tools, help us to improve our websites performance and to enhance your experience.

We use cookies to help us:

- Make our website work as you'd expect
- Remember your settings during and between visits
- Improve the speed/security of the site
- Monitor user traffic patterns
- Understand how our visitors use our website
- Optimise our onsite communication

What all of this means is that you get the best possible user experience and relevant information based on your needs.

What we don't do

We don't use cookies to gather any personal information that could be used to identify you or to advertise products & services to you on other websites.

What is a cookie?

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website, which enables the website to tailor its offerings to your preferences when you visit it.

Our Cookies:

Google

Name	Purpose	Expiry
_ga	Used to distinguish users.	2 years
_gid	Used to distinguish users.	24 hours
_gat	Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named <code>_dc_gtm_<property-id></code> .	1 minute
AMP_TOKEN	Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service.	30 seconds to 1 year
gac<property-id>	Contains campaign related information for the user. If you have linked your Google Analytics and AdWords accounts, AdWords website conversion tags will read this cookie unless you opt-out.	90 days
IP Anonymization	Anonymizing Google Analytics means altering the IP address of visitors to a website before sending the tracking data to Google. This means you are anonymous and no one can track you.	N/A
User and Event Data Retention	This data is associated with cookies, user identifiers or advertising identifiers.	14 months

Necessary cookies

Name	Purpose	Expiry
Resolution	Used to ensure the correct version of the site is displayed to your device.	N/A
Session	Used to track your user session on our website.	N/A

Managing cookies

You can set your cookies when you initially visit our website and can manage your settings on subsequent visits, via the cog icon in the bottom left of your screen.

If you choose to decline cookies, some parts of the 32Recruit website may not work as intended or may not work at all.

1.3 Information we collect from third parties

We may also receive information about you from third parties. These may include your referees to verify the information you have given us regarding your work history and performance, our clients may share personal information about you with us, we may find information about you on social media e.g. LinkedIn or other jobsites, another agency or organisation may pass your details to us, you may be referred to us through another agency as a supplier to a contract, or we may receive other information from government organisations when performing background checks where required.

2. Client Data

This section applies where you are an individual working for an employer that we provide recruitment services to.

- **Providing recruitment services** – If you are a **32Recruit** customer we need to collect and process information about you, or individuals at your organisation, in order to provide you with our recruitment services. These include (without limitation); finding a suitable pool of candidates for your vacancies, providing you with a Managed Service Provider (“MSP”) programme directly or through another organisation, providing you with Recruitment Process Outsourcing (“RPO”) services directly or through another organisation, to provide you with market relevant information, or to source potential opportunities from you as part of our recruitment services.
- **The information we collect** – The information we collect about our clients is very minimal and is generally only to ensure our relationship and the services we provide run smoothly, or to comply with our legal requirements. These include (but are not limited to) retaining records of our dealings where appropriate to ensure compliance with our contractual obligations, to address any query regarding legal claims, to assess suitability to contact you regarding potential opportunities and/or our services, and to ensure compliance with this privacy notice.

3. How we use the data we collect

We use, store and process information including personal information, about you to provide and improve our recruitment services to you and our clients and to comply with our legal requirements.

3.1 Providing our recruitment services

- **Submission of details to clients** – If you apply for a role we are advertising, or you request to be put forward for suitable positions that match the preferences that you have provided us with; we will share some of your personal information with our clients in relation to these vacancies. These can include your name, work history and any relevant qualifications in relation these vacancies.

- **Providing reports to clients, managing pay and work performance** – To allow us to measure our performance we are required to provide reports periodically to our clients. This information can include your personal information to include your name, pay rate and total hours worked and also to demonstrate our adherence with our legal requirements.

3.2 Improving our services

- **Staff training** – We regularly monitor and review the performance of our staff to ensure we are providing a quality service to our customers; that this service is compliant with our obligations and is in line with best practice. We therefore review your records on our database and any feedback you provide us with in order feed into the training we provide.
- **Marketing** – Where you have given us permission to do so we will send you promotional messages, marketing, advertising and other information we may think is of interest to you. This can include information regarding our referral programmes, competitions, events and surveys to help improve our website and to gain feedback on proposed business development

4. Sharing and disclosure

In order to successfully provide our recruitment services, it is sometimes necessary to involve some of our partner organisations to assist us in doing so. We have carefully selected these partners and have taken steps to ensure that your personal information is protected and stored securely. The instances where it is necessary to share your information with these partners are described here;

4.1 Sharing with service providers

- Parties that process data on our behalf – In order to help us operate as a business, in providing our recruitment services, we sometimes need to outsource some of our functions to external providers. These third parties have only limited access to your information, may use your information only to perform these tasks on our behalf, and are obligated to us not to disclose or use your information for other purposes. These include (without limitation) IT support, cloud platforms to host and store our data, training providers and platforms, legal and professional advisers, background screening providers, insurers and auditors.
- Managed Service Providers (“MSPs”) or Recruitment Process Outsourcing services (“RPOs”) – Some of the organisations we work with outsource their recruitment function to other organisations called MSPs or RPOs. In order for us to submit you to a vacancy at the organisation we need to work through these third parties who will process your data and application on their behalf. We will always have agreements in place to ensure your data is fully protected and your same rights apply regardless.

4.2 Sharing with other third parties

- From time to time we may be required by regulators or law enforcement agencies, to provide information to them in order to prevent or detect criminal offences or fraud, to prevent harm or as part of other investigations where there is a legal basis for doing so. Where appropriate, we will notify you of such legal requests, unless providing notice is prohibited by the legal process itself.

4.3 With your consent

- Individuals, hirers and other third parties – Where you have expressed an interest in relation to the current or prospective vacancies that we are working on, we will share your details with those involved in the recruitment process in relation to these.

Ensuring we have a full data transfer agreement in place, that incorporates the current standard contractual clauses as set out by the European Commission when transferring data from a data controller within the European Economic Area to data controllers and processors outside of the regulation's authority

Transferring your data to a country which has been approved by the European Commission in respect of their local data protection legislation

Where you have consented to it, or there is another legal basis for the transfer

5. How long do we store your information?

Our general approach is to only store your personal information for as long as we are required to do so, or for as long as the data we hold is relevant. We therefore apply the following information retention periods;

- We will retain your information for a period of two years from our last point of meaningful contact with you. Meaningful contact for us is where you have actively communicated, either verbally or in writing, with us in relation to our recruitment services. As a candidate this may include any communication where you express interest in the potential roles we are working on, or where you have provided us with an updated version of your CV in relation to these roles. As an agency, we see meaningful contact is general keeping in touch via conversation or writing.
- As a recruitment business we are required to hold records of the services we provide in order to comply with our legal obligations. These include (without limitation);

For 12 months from the date we last provided our recruitment services to you, under the Conduct of Employment Agencies and Employment Business Regulations, 2003.

For 6 years from the end of each tax year for the purpose of retaining payroll records under the Income Tax (Employment and Pensions) Act 2003.

6. Security & Confidentiality

We are continuously implementing and updating administrative, technical, and physical security measures to help protect your information against unauthorised access, loss, destruction, or alteration. All of our data is stored on secure databases for which we have robust security systems in place to limit the likelihood of 'hacking'. These include regular vulnerability, disaster recovery and penetration tests on our systems internally, and we are Cyber Essentials certified, which gives us a clear picture of our cyber security grading and any areas of risk to us and our customers. If you know or have reason to believe that your personal information has been lost, stolen, misappropriated, or otherwise compromised, please contact us following the instructions in the Contact Us section below.

7. Your rights

We take the protection of your personal information very seriously and it is important you understand the rights you retain in respect of your data, even after you have shared it with us;

- Rights in relations to automated decision making – We will not make any decisions based purely on automated processes to assess your suitability for the vacancies we are working on.
- Rights to make a Subject Access Request (SAR) – You have the right to request to see all the information we are holding on you at any time, there will be no charge for this service unless you have made more than one request for the same information.
- Right to data portability – Where this is possible, you have the right to request for us to transfer the information we are holding on you to another organisation. This can only be done with explicit direction from you and we will never pass your information to other organisations without us having received this.
- Rights to restrict processing – You have the right to restrict the processing of your data in certain circumstances.
- Right to withdraw consent – Where we have obtained your consent for us to process your information (for example for marketing purposes), you similarly will have the right to withdraw this consent at any time and we will cease to carry out the process for which we were holding this for, unless there is another reason which compels us to do so.
- Right to be forgotten – Similar to consent/withdrawing your consent, you have the right to request your data is removed from our systems. We may be required by law to hold some information on you if we have actively sought work for you, or if you have worked through us as a temporary worker. This information will be held in our secure systems and we will only hold it for as long as we are legally required to do so.
- Right to rectification – where the data we hold about you is factually incorrect or incomplete you have the right to request correction or completion and we will do this without undue delay.



- Right to lodge a complaint – Where you are unhappy as to the way we are handling your personal information you have the right to lodge a complaint with the Information Commissioner’s Office; www.ico.org.uk

8. Contact us

If you have any queries or concerns as to the way we process your personal information, then please contact us – info@32recruit.com