

## Star Privacy Notice

Star rec2rec Ltd (Star) will be what is known as the 'Controller' of the personal data you provide to us. Star's registration number is 07956750 and our registered address is 20-22 Wenlock Road, London, N1 7GU. Star is committed to protecting and respecting your privacy. This notice sets out the basis on which any personal data we collect from you, or that you provide us, will be processed by us.

### What does this Policy cover?

- The types of personal data that we collect about you
- Explains how and why we collect and use your personal data
- Explains how long we keep your personal data for
- Explains when, why and with who we will share your personal data
- Sets out the legal basis we have for using your personal data
- Explains the effect of refusing to provide the personal data requested
- Explains how we may contact you and how you can contact us.

**Who we are and what we do:** we are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Business Regulations 2013.

### Where do we collect personal data about you from?

The following are the different sources where we may collect personal data about you, which allow us to undertake our business:

- Prospective and placed candidates
  - By a reference or word of mouth. For example, you may be recommended by a friend, a former employer, a former colleague or even a present employer.
- Prospective and live client contacts
- Supplier contacts to support our services
- Employees, consultants, temporary workers
- Through publicly available sources. We use the following public sources: LinkedIn, Facebook, Instagram, Twitter, Job boards, Corporate websites

### Types of Data We Collect - What personal data do we collect about you?

In order to provide the best possible employment opportunities that are tailored to our candidates, we need to process certain information. We only ask for details that will genuinely help us to help candidates find a new role, such as name, contact details, education details, employment history and immigration status (and other relevant information you may choose to share).

We may also collect sensitive personal data about you, such as details of criminal convictions and ethnic origin. We only collect sensitive personal data from you, and further process this data, where you have given your consent.

If you are a Star client, we need to collect and use information about you, or individuals at your organisation that we have dealings with, in the course of providing you with our recruitment services. This can include finding candidates to fill your roles or notifying you of content published by Star which may be relevant to you. Star will also store information relating to previous dealings with us, including job applications, email and telephone communications, job interviews and placements.

We will likely obtain further personal information about you during our relationship with you. This information may be obtained from you directly or from third parties, such as organisations to whom we have provided your CV and who have engaged with you as part of a job application.

### **Where we obtain your information.**

- Online Profiles through publicly available sources. We use LinkedIn, Facebook, Twitter, Instagram and Corporate Websites
- By Reference or word of mouth. For example, you may be recommended by a friend, a former employer, a former colleague or even a present employer.
- When you correspond with us by phone, email or otherwise
- When you register with our website or apply for jobs via our website
- When you apply for one of our jobs via a job board
- When you register your CV on a job board and it matches the skills we're looking for

When we obtain your information from external sources such as LinkedIn, Other Social Media Profiles, Corporate websites and Job Boards we will inform you, by sending you this privacy notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from, and for what purpose we intend to retain and process your personal data.

There are two main ways in which we collect client data:

- Directly from you
- From third parties such as candidates, online job boards, LinkedIn, other social media / networking sites and networking.

### **How and why we use your personal data?**

We use your personal data to provide a service to you and fulfil contractual obligations with our clients, we match your skills, experience and education with a potential employer.

We will initially collect basic information on you such as contact details, job role and experience and then pass this on to the client in search of personnel. If you are chosen by the client and go through to the next stage, we will then be collecting more information from you at the interview (or equivalent) stage and onwards in that manner.

We respond to your enquiries and maintain a relationship with you to enable you to submit your CV for general applications, to apply for specific jobs or notify you about future job opportunities. We share career advice, news, industry updates and referral opportunities. You will be given an option to opt-out of such emails, with an option to unsubscribe with each communication.

You can update your CV / details at any time, by e-mailing [katherine@starrec2rec.com](mailto:katherine@starrec2rec.com) with your new information / contact details. Your old information / contact details will be deleted / archived on our CRM system.

### **How long do we keep your personal data for?**

We will delete personal data from our systems if we have not had any meaningful contact with you for six years. After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

We will consider there to be meaningful contact with you if you submit your updated CV onto our website, apply for jobs with us or we receive an updated CV from a job board.

We will also consider it meaningful contact if you communicate with us about potential roles, either by verbal or written communication or engage with us on any of our social media platforms, professional networking sites and marketing communications.

Under new data protection regulations (GDPR), we are required to keep the data we hold accurate and, where necessary, up to date. We conduct regular data-cleansing and updating exercises with our candidates to ensure that your data is up to date and accurate.

Whilst we will endeavour to permanently erase your personal data once it reaches the end of its retention period or where we receive a valid request from you to do so, your data may still exist within an archive system. This cannot be readily accessed by any of our operational systems, processes or staff.

### **Who do we share your personal data with?**

We do not share your data with any third parties for marketing purposes or third-party business.

If you are a Candidate - we share your personal data with the client who has a position to fill, to determine with the client whether you are a good fit for the available position. We will only share your personal data and introduce you to a client with your express consent.

### **What legal basis do we have for using your information?**

For prospective candidates, referees and clients, our processing is necessary for our legitimate interests in that we need the information to be able to assess suitability for potential roles, to find potential candidates and to contact clients and referees.

We think it's reasonable to expect that, if you are looking for employment or have posted your professional CV information on a job board or professional networking site, you are happy for us to collect and otherwise use your personal data to provide our recruitment services to you, share that information with prospective employers (with your consent) and assess your skills against our live vacancies.

During the job offer process, your potential employer may also want to confirm your references, qualifications, health information and criminal record, to the extent that this is appropriate and in accordance with the law. We will always ask for your consent before undertaking such processing.

What happens if you do not provide us with the information we request or ask that we stop processing your information?

If you do not provide the personal data necessary or withdraw your consent for the processing of your personal data, we may not be able to match you with available job opportunities.

We want to provide you with tailored job alerts to help you on your job hunt. We therefore think it's reasonable for us to process your data to make sure that we send you the most appropriate jobs / job updates.

## **Data Storage and Processing**

All of the personal data we hold about you will be processed by our staff in the United Kingdom, and accessed by our cloud-based CRM system, RDB Pro Net. We take all reasonable steps to ensure that your personal data is processed securely and prevent unauthorised access to, and misuse of your personal data.

## **Who do we share your data with?**

As required under GDPR, we will only share your information to prospective employers with your express consent.

## **Data Subject Access Requests**

You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. If you wish to access your data at any time, there will be no administration charge (unless the request is excessive) and the request should be fulfilled within 30 days. To make such a request, please email [katherine@starrec2rec.com](mailto:katherine@starrec2rec.com)

## **The right to restrict processing**

You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.

## **Marketing Consent**

From time to time we would like to send you details of networking and client events and general information about the recruitment industry sectors which we think might be of interest to you. If you would not like to receive such information, please email [katherine@starrec2rec.com](mailto:katherine@starrec2rec.com) to opt out of marketing consent.

## **Changes to our privacy notice**

Any changes we make to our privacy notice in the future will be updated on our website and where appropriate, notified to you by email.

## **How will we contact you?**

We may contact you by phone, email or social media. If you prefer a contact means over another, please just let us know.

## **Contact**

Questions, comments or requests regarding this privacy notice are welcomed and should be addressed to [katherine@starrec2rec.com](mailto:katherine@starrec2rec.com)