



Company Name:	Ashberry Recruitment Ltd
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Ashberry Recruitment Ltd is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, Ashberry Recruitment Ltd acts as a data controller.

You may give your personal details to Ashberry Recruitment Ltd 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. Ashberry Recruitment Ltd 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 this privacy statement. At all times we will comply with current data protection laws.

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1. Collection and use of personal data

a. Purpose of processing and legal basis

Ashberry Recruitment Ltd 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, arranging payments to you and developing and managing our services and relationship with you and our clients.

If you have opted-in we may also send you marketing information and news via email/text. You can opt-out from receiving these at any time by emailing us to “unsubscribe” when you receive these communications from us.

In some cases we may be required to use 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.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

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

b. Legitimate interest

This is where Ashberry Recruitment Ltd 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 we have relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Providing work-finding services to you and our clients;
- Providing recruitment services and to meet our obligations towards the party whom you represent, or other Clients or suppliers;
- To contact you regarding potential opportunities/and or our service;
- Assessing your suitability for roles;
- Managing our database and keeping your records up to date;
- Establishing compliance with contractual obligations with clients or suppliers;
- Contacting you to seek your consent where we need it;
- Establish and maintain a personalised service to you whether via our website or otherwise;
- Giving you information about similar products or services that you have used from us recently

c. Statutory/contractual requirement

Ashberry Recruitment Ltd has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements.) Our clients may also require this personal data, and/or we may need your data to enter into a contract with you. If you do not give us personal data we need to collect we may not be able to continue to provide work-finding services to you.

d. Recipient/s of data

Ashberry Recruitment Ltd will process your personal data and/or sensitive personal data with the following recipients:

- Clients that we introduce you to within our specialist sectors
- Former or prospective employers that we obtain references from or to
- Other recruitment agencies in the supply chain e.g.: Master/Neutral Vendors for work-finding and auditing purposes
- Government and law enforcement agencies and other regulators such as HMRC, OFSTED, CQC, Local Authority Designated Officers (LADO)
- Public Information Services and third party organisations that we use to carry suitability checks on work-seekers such as: the Disclosure and Barring Service (DBS), Health Care Professional Council (HCPC), DVLA
- Payroll intermediaries who may introduce you
- Parties who process data on our behalf such as IT support, CRM, Recruitment and online timesheet software providers
- Legal and professional Advisors
- Insurers

2. Third Party Data

Where you have not provided your personal data directly to Ashberry this paragraph applies in order to describe what data we hold and process and where we obtained your data from.

Categories of data: The Company has collected the following personal data on you:

Personal data:

- Name & contact details
- In some cases your CV to include employment history, educational history, qualifications & skills
- In some cases your contact details of referees, if provided in CV
- In some cases personal information relating to hobbies & interests, if provided in CV

Source of the personal data: Ashberry Recruitment Ltd sourced your personal data by one of the following means:

- Job board
- Social media platforms, for example: LinkedIn
- From a former employer
- Referral made by a friend/colleague

This information did not come from a publicly accessible source.

3. Data retention

Ashberry Recruitment Ltd 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, for example: 1 year from the date we last provided work-finding services to you (Regulation 29 of the Conduct of Employment Agencies and Employment Businesses Regulations 2003); or 2 years from the end of your last period of engagement or employment for the purposes of providing evidence that right to work checks were carried out under The Immigration (Restrictions of Employment) Order 2007.

We must also keep your payroll records, holiday pay, sick pay and pension's auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation. In most circumstances your data will not be retained in excess of 6 years from the date of your last period of engagement or employment.

However, where we have a legal or contractual obligation to do so, we may retain data for longer than a 6-year period.

4. Your rights

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

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company 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 Ashberry Recruitment Ltd processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by contacting: Lucie Pollard, Compliance and Data Protection Officer at dataprotection@ashberryrecruitment.com.

There may be circumstances where Ashberry Recruitment Ltd will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.

If you believe that any of your data that Ashberry Recruitment Ltd 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.

5. Cookies

We may obtain data about you from cookies. These are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies also enable us to deliver more personalised content.

The table below explains the cookies we use and why.

Cookie Type	Name	Purpose
Analytics	_ga	Used to distinguish users
Analytics	_gid	Used to distinguish users
Analytics	_gat	Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named _dc_gtm_<property-id>
Analytics	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
Analytics	_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.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, please refer to our Cookie Policy on our website.

6. Log Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

7. Links to external websites

Ashberry Recruitment's website may contain links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Ashberry Recruitment Ltds website.

8. Sale of business

If the Company's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

9. Data Security

The Company takes every precaution to protect our users' information. We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored.

Only employees who need the information to perform a specific job (for example, consultants, our finance staff or a marketing assistant) are granted access to your information.

Ashberry Recruitment Ltd uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/ the Internet is not entirely secure and for this reason Ashberry Recruitment Ltd cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/the Internet.

If you share a device with others we recommend that you do not select the "remember my details" function when that option is offered.

If you have any questions about the security at our website, you can email: Lucie Pollard, Compliance and Data Protection Officer at dataprotection@ashberryrecruitment.com

10. International Transfer

We endeavour to keep all of your personal information in the European Economic Area (EEA). The EEA includes all EU Member States plus Norway, Iceland and Liechtenstein.

In limited, and necessary, circumstances your information may be transferred or processed outside of the EEA. Where this does happen, we will put special protections in place. We will only move data to countries or organisations where the EU Commission has deemed their data protection measures to be adequate.

11. Changes to this privacy statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates.

12. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Lucie Pollard, Compliance and Data Protection Officer at dataprotection@ashberryrecruitment.com

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.