

Planning Recruitment Limited Privacy Policy

Planning Recruitment is a recruitment business which provides recruitment services to its clients and candidates. We must process personal data (including sensitive personal data) so that we can provide these services – in doing so; we act as a data controller.

You may give your personal details to us directly, such as on a job application, registration form, via our website, or we may collect them from a third-party source such as a job board.

We must have a legal basis for processing your personal data. For the purposes of providing you with recruitment services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms below.

Scope of this Policy

Legitimate Interests

We believe that we have a legitimate interest in processing your data for the purposes of providing recruitment services to both our clients and candidates. We believe that this helps us provide you with a more personalised service and that it is in everybody's interest for us to do so.

Candidates

- We believe that it is reasonable to expect that if you are looking for employment, emailed us your CV or have posted your CV onto a job board or networking site, you are happy for us to collect and use your data to offer or provide you with work seeking services. This can include forwarding your details to prospective employers or matching your details against our open vacancies. Prospective employers might want to verify certain aspects such as references and qualifications. We need to be able to do this to function as a profit-making organisation.
- We must comply with various legal, regulatory and tax obligations and we have a legitimate business interest in doing so. Therefore, we may share your data with the appropriate authorities to meet these obligations.
- To ensure we can provide services to you we will need to use your data for internal processes such as payroll or invoicing.
- We want to help you find a job. We believe that sending you job recommendations and relevant market intelligence will facilitate this. We will process your data to send you appropriate content.

Clients

To ensure that we can provide you and your organisation with the best possible service we store details of the organisation and its contacts as well as notes of conversations, emails, meetings and previous jobs and recruitment activity. We believe that this falls within our legitimate interest in providing recruitment services to you.

Candidate Data Collected

In providing you with recruitment services we may collect some or all of the following types of personal data. The reason we do this is to enable us to provide the best service we can to help you find your next job. The following list is not exhaustive and is in addition to any data that we are required by law to process:

- Name;
- Gender;
- Job title;
- Profession;
- Education Details
- Right to work in the UK / Nationality
- Employment History
- Referee Details
- Contact information such as email addresses and telephone numbers;
- Demographic information such as post code, preferences and interests;
- Details of any Criminal Convictions (If required by role)
- Extra information you choose to tell us
- IP address (automatically collected);
- Web browser type and version (automatically collected);
- Operating system (automatically collected);
- A list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected);

How we collect your personal data

- Directly – any personal data you supply to us
- Indirectly – Data obtained via CV search engines, referrals & social media
- Personal data we collect automatically via our website.

Our Use of your personal data

Any personal Data you consent to us storing will be held for a 2-year period.

- Unless we are obliged or permitted by law to do so, your Data will not be disclosed to third parties.
- All personal Data is stored securely in accordance with the principles of the General Data Protection Regulations 2018.
- Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our service Specifically, Data may be used by us for the following reasons:
 1. Recruitment Activities
 2. Internal record keeping;
 3. Improvement of our services;
 4. Transmission by email of promotional materials that may be of interest to you;
- Contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Website.
- To help us establish, exercise or defend legal claims.

Candidate Consent to store data

You have the right to consent freely and understanding what you are consenting to. You will be in control of your data and have the right to withdraw it at any time.

We will keep a record of your consent in the following process:-

- All data will be stored for 2 years upon consent.
- All data stored requires consent. All work seekers will be contacted via email or text to select one of the following 3 options: -
 1. Full permission - I consent to Planning Recruitment supplying my personal information to potential employers, and making that information available for searches for potential employers.
 2. Prompt me for Permission – I consent to Planning Recruitment storing my personal information (including my name, contact details and CV information) in the cloud and using that information for the purpose of telling me about potential future employment opportunities.
 3. Permission Denied – Right to be forgotten - All data will be removed;
- Please note by emailing us directly or indirectly through a jobs portal, applying for a position with your CV - you are giving us consent to store your information.

Client Data

The client data we collect is very limited to contact details of the company and individuals in your organisation who will directly deal with recruitment activities. (Name, telephone and email addresses).

Use of client data;

- We use client data for recruitment & marketing activities
- Keeping records of conversations and meetings so that we can provide a tailored service to you.
- Processing data for targeted marketing campaigns.
- You have the right to withdraw consent at any time by contacting our data controller.

People whose data we receive from candidates such as referees.

We only use the information that our candidates provide us for the following purposes

Referees – We will contact you in order to obtain a reference. We may sometimes use your details for recruitment activities we think may interest you. In this event we will use your data with the same purpose as Client Data

Establishing, exercising or defending legal claims.

Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".

This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

Who we share your personal data with

We share your data with a variety of other parties during the course of conducting our business, in several ways, for a number of reasons.

They are as follows:

Candidates

- Our clients and other recruitment businesses in the performance of finding suitable employment for you
- Third party IT companies with whom we are contracted to and have appropriate data processing agreements
- Third party services providers who perform work on our behalf (e.g. lawyers, IT providers etc.)
- Tax and local authorities to enable us to comply with laws and regulations
- Job boards and job aggregators, where it helps us find you work

Clients

Third party IT companies with whom we are contracted to and have appropriate processing agreements

- Third party services providers who perform work on our behalf (e.g. auditors, lawyers, IT providers etc.)
- Tax and local authorities to enable us to comply with laws and regulations

Changes of Business Ownership and Control

We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Planning Recruitment Limited. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

In the event that any Data submitted by Users is to be transferred in such a manner, you will be contacted in advance and informed of the changes.

The consent will be transferred, but you will still retain the right to withdraw your consent.

Your Right to Withhold Information

You may access certain areas of the Website without providing any Data at all. However, to use all features and functions available on the Website you may be required to submit certain Data.

You may restrict your internet browser's use of Cookies.

Your Rights - Accessing your own Data

You have the right to ask for a copy of any of your personal Data held by us (where such data is held).

Data Subject Access Requests (DSAR).

- 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.
- We will request proof of identification to carry out the task
- An administration charge of £10 will be applicable.
- We would only be entitled to refuse to comply with your request for one of the following reasons:
 1. to exercise the right of freedom of expression and information;
 2. to comply with legal obligations or for the performance of a public interest task or exercise of official authority;
 3. for public health reasons in the public interest;
 4. for archival, research or statistical purposes; or

5. to exercise or defend a legal claim.
 6. When complying with a valid request for the erasure of data we will take all reasonably practicable steps to Delete the relevant data.
- Right to restrict processing: You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either:
 1. one of the circumstances listed below is resolved;
 2. you consent;
 3. further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.
 - The circumstances in which you are entitled to request that we restrict the processing of your personal data are:
 1. where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
 2. where you object to our processing of your personal data for our legitimate interests;
 3. where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it;
 4. where we have no further need to process your personal data, but you require the data to establish, exercise, or defend legal claims.
 - If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.
 - Right to rectification: You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

- Right of data portability: If you wish, you have the right to transfer your personal data between data controllers. In effect, this means that you can transfer your details to another online platform. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to another online platform. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.
- Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with your local supervisory authority.
- If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), please contact our Data Controller.

Safeguarding your information

Data security is of great importance to us and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected.

All data collected is stored in a cloud-based CRM System which has site-wide encryption and password protected. This includes measures to deal with any suspected data breach.

If you suspect any misuse or unauthorised access or loss of your personal information please contact our Data Controller.

Cookies

Our website stores a number of different cookies on the computer or device that you use to access our website. Cookies are small text files used by browsers to store small bits of information about a device or computer, such as preferred settings or preferred languages.

Cookies do not take up much space (unless you have thousands of them) and cannot contain viruses or other harmful code.

The ICO has categorised all cookies into 4 classes. Using our site may result in the following cookies being stored on your computer:

Category	How we use it	Name of Cookies used.
Category 1: strictly necessary cookies	Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.	CookieConsent
Category 2: Performance Cookies	Preference cookies enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in.	Userlang

Category 3: Functionality Cookies	Statistic Cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.	_ga _gid _gat cookiecomplianceFirstLoad
Category 4: Targeting Cookies or Advertising Cookies	Marketing Cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.	collect NID

Changes to this Policy

We reserve the right to change this Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the Policy on your first use of the Website following the alterations.

Contact details:

Please contact our Data Controller for any changes, withdrawal of consent or complaints in relation to this Privacy Policy.

Direct to Claire Colley – Data Controller

By post:

Data Controller

Planning Recruitment Limited,

Unit 8 Vicarage Farm Business Park,

Winchester Road

Fair Oak

SO50 7LG

By email:

GDPR@planningrecruitment.com

You also have the right to raise concerns with the 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.