

Privacy Policy

Company Name: Escape Recruitment Services Ltd. Company number **SC209162**.

Company Contact Details: Compliance@escaperecruitment.com, 01506 461445

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Escape Recruitment Services Ltd is a recruitment business, acting as both an employment business and an employment agency. At Escape our vision is to grow by putting customers at the heart of everything we do. For us, our customers are our candidates, our clients, our suppliers and our colleagues.

A key part of delivering our recruitment, payroll and assessment services for our two biggest customer groups, our candidates (job seekers) and our clients (employers/hirers) involves processing personal data. We must also process personal data (including sensitive personal data) so that it can provide these services – in doing so, Escape (referred to as The Company in this document) acts as a data controller and this Privacy Notice explains what we do with your personal data, whether you are a:

- **Candidate** we are in the process of helping to find a job.
- **Candidate** we are continuing our relationship with once we have found you a position.
- **Client** who we provide a service to.
- **Supplier** we are receiving a service from.
- **Visitor** to our websites.

It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights. In accordance with the data protection legislation (including but not limited to the General Data Protection Regulation (GDPR (Regulation (EEA) 2016/679) (the "GDPR"))).

This Privacy Notice applies to the personal data of our website users, candidates, clients, suppliers, and any referees and/or emergency contacts for both candidates and staff. To be clear, if you are a member of Escape Staff, you should refer to the Escape Staff Privacy Policy.

It is important to point out that this privacy notice is subject to review and we may update and/or amend where appropriate. You can stay up to date by visiting this page as we will post any changes here; however we will wherever possible notify you of any changes.

Types of personal data

Candidate Data

In order to provide the best employment opportunities for you either in a permanent post or as a temporary worker, we need to process personal data about you for example:

- Your name
- Contact details
- Education details
- Employment history
- Emergency contacts/ next of kin
- Referee contacts
- Age (where it relates to national minimum wage)
- Financial information (where we need to carry out financial background checks, bank details etc.)
- National Insurance Number
- Photograph
- Any other relevant information you choose to share with us.

Additionally we may process the following sensitive data:

- Place of Birth/ Ethnic Origin/ Immigration status (for right to work).
- Information related to your health and/or diversity information in accordance with The Equality Act 2010.
- Details of any criminal convictions in accordance with Disclosure Scotland and The Rehabilitation of Offenders Act 1974 (Exclusions and Exceptions) (Scotland) Amendment Order 2018.

Please note the above lists are not exhaustive and we may collect other data.

Client Data

If you are an Escape Recruitment client, we need to process information about you, or individuals at your company (contact name, telephone number, email address etc.) in the course of providing you services e.g.:

- Finding Candidates who are the right fit for you or your company,
- Assistance with assessments or payroll services,
- To assist your engagement with a Managed Service Provider programme or Recruitment Process Outsourcing programme,
- Notifying you of any updates e.g. Employment Law Updates, relevant industry reports and updates, UK job market reports, salary bench marking etc.

Supplier Data

A small amount of personal information is required from our Suppliers e.g. contact details of relevant individuals at the organisation, to be able to communicate with you. We also need other information such as your bank details so that we can pay for the services you provide.

Referees/ Next of Kin

To enable us to provide Candidates with suitable employment opportunities and to prepare for every eventuality, for them and our staff, we require basic information on referees or next of kin. We only ask for contact details, so that we can get in touch with you either for a reference or because you've been listed as next of kin/ emergency contact for one of our Candidates or Staff.

Website Users

We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website. This has also helped us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, and the times that our website is most popular.

Legal Basis

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of; providing you with services if you are a candidate, client or web user, engaging with you as a supplier providing us with a service or where you are a referee/ next of kin for a candidate /member of staff. The legal bases we rely upon to offer these services to you are:

- Legitimate interest when processing is necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the individual which require protection of personal data.
- Legal obligation when Processing is necessary for compliance with a legal obligation that the controller is subject to.
- Contractual obligation when Processing is necessary for the performance of a contract with the individual or in order to take steps at the request of the individual to enter into a contract.
- Consent when processing special sensitive data of the individual for one or more specific purposes.

Legitimate interest

Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Processing personal data is key to delivering our recruitment services for our two main customer groups; our candidates (job seekers) and our clients (employers/hirers),
- Our business will benefit from successfully introducing candidates on a permanent, temporary or contract basis to our clients,
- Our clients who are looking to employ a new member of staff will benefit from being provided with information on relevant and suitable candidates in the marketplace currently looking for work,
- The benefits are both crucial to our own business, as processing is vital to achieve our purpose and to provide a service to our client's organisation,
- The candidate's themselves, whose data is being processed, will also benefit from having the opportunity to be considered for and introduced for roles they wish to be considered for.

Legal & Contractual Obligation

Your personal data is required by law and/or a contractual requirement 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; that you would be unable to take up either permanent employment or you would be unable to be engaged as a temporary worker.

Consent

Where the company has requested your consent either in writing or verbally to process your sensitive personal data which may be required/ provided. Additionally consent will be requested for the purposes of direct marketing.

How we collect personal data

Candidate Data

Below are the main ways in which we collect your personal data:

- Directly from you,
- From third parties e.g. job boards,
- Social Media,
- Referrals.

Data you give us

In order for us to provide you with a service and to enable us to provide job opportunities there are several ways you can share your information with us:

- Leaving a hard copy CV at Escapes Office(s), job fair, or recruitment event,
- Posting or Emailing your CV directly to the company/ consultant ,
- Via interview with a consultant,
- Signing up to our website, applying for vacancies on our website, comments or chat on the website,
- Applying through job boards where we advertise vacancies.

Data we receive from other sources

We also receive personal data from other sources depending on the circumstances, these may include the following:

- Job boards and job site databases,
- LinkedIn,
- Social Media,
- Refer a Friend,
- Referees,
- Clients.

Client Data

Below are the main ways in which we collect your personal data:

- Directly from you,
- From third parties,
- Market research,
- Social Media,
- Referrals,
- Directories or events.

Data you give us

In order for us to provide you with a service we will receive data from you in the following ways:

- Where you contact us directly either by phone, email, web message or chat,
- Where we contact you either by phone, email, through consultants, via social media, or other business development activities.

Data we receive from other sources

We may also collect your data from other sources depending on circumstance:

- Third party marketing research, analysis online and offline media,
- Delegate lists at relevant events,
- Referrals,
- Other limited sources and third parties e.g. candidates

Supplier Data

We collect your personal data during the course of our work with you.

Referees/ Next of Kin

We collect your contact details only where a Candidate or a member of our Staff puts you down as their next of kin or where they give them to us in order for you to serve as a referee.

Web users

We will collect your data automatically using cookies when you visit our website, in line with your cookie settings.

To find out more about the cookies we use, please see our [cookie policy](#).

Using your personal data

Candidate Data

The reason for using your personal details is to help you gain permanent or temporary employment and give advice on the job market. The more information we have about you, your skills and ambitions, the more effective our services will be. We may also use your personal data for things like marketing, etc. Where appropriate, we will seek your consent to undertake these activities.

Client Data

The reasons for using information about clients is to ensure that we maintain our professional relationship and to ensure all contractual arrangements/ obligations are fulfilled.

Supplier Data

The reasons for using your personal data are to ensure the contractual arrangements can be fulfilled and to comply with any legal requirements.

Referees/ Next of Kin

We use referee personal data to assist our candidates to find employment. We use the details of next of kin for staff and some candidates in the event of an accident or emergency.

Web users

We use your data to help improve your experience of using our website. If you are a candidate or a client we may use your data from the website to improve our communications or service to you.

Sharing your personal data

Candidate Data

To deliver our work-finding services for you, we share your personal data with third parties for a number of reasons. Primarily this is when we share the data with prospective employers to maximise the chances of securing you with a job. Additionally we work with third party outsourced IT consultants and specialist technical providers; who provide technical support and development on our business technology systems and access to specialist communication tools. Also we may be required to share information with Tax and/or audit authorities where legally we are required to do so.

Client Data

Where necessary we share your data to ensure delivery of our recruitment services to you. Additionally we work with third party outsourced IT consultants and specialist technical providers; who provide technical support and

development on our business technology systems and access to specialist communication tools. Also we may be required to share information with Tax and/or audit authorities where legally we are required to do so.

Supplier Data

We may share your information with any of our third parties such as service providers and organisations to whom we provide services, unless you state otherwise. We work with third party outsourced IT consultants/ providers who provide technical support and development work on our business technology systems. Additionally we may share information with Tax and/ or audit authorities where legally we are required to provide them with details.

Referees/ Next of Kin

As a referee or next of kin for a candidate we may share your information for example with relevant clients who request this data for the employment of a candidate. Additionally we work with third party outsourced IT consultants/ providers who provide technical support and development work on our business technology systems.

Web users

To deliver a relevant and targeted service, your information is shared with providers of web analytics services, marketing automation platforms and social media services. You can control this information via your cookie settings. Read more in our [cookie policy](#).

Retention period for data

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time. We will delete your data from our systems:

- two years from last touch if you're a candidate
- five years from last touch for clients
- where you are a referee or next of kin for either a candidate or member of staff you will be retained in line with their file.

When we refer to "last touch", this means since our last communication either verbally, written or where you have actively engaged with our services e.g. you have interviewed with one of our clients.

However we must also keep all 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.

Safeguards and Transferring of Data

Safe guards

It is important to us that we take appropriate measures to protect your information. The measures we have in place are designed to prevent unauthorised access to and misuse of your personal data. We have committed to taking all appropriate and reasonable steps to protect all personal data we hold. The safeguards are a combination of technical, organisational, physical and process driven measures which include a process to deal with any suspected breaches of data protection.

Overseas Transfers

The Company may have to transfer only the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. The two main reasons for this are; the organisations who are perspective employers may work in a global company and the hiring manager works out with the EEA additionally some of our software providers we may liaise with might be out with the EEA. However as far as possible we will use software providers who have services in the EEA. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

Automated decision-making & Profiling

Automated decision-making

Escape Recruitment may on some occasions use an automated decision-making tool when advertising through third party job boards as a sifting mechanism e.g. asking if you have a full driving licence when the job you are applying for requires it; therefore if you say no you are automatically sifted out. This is seen as a logical measure to ensure only relevant candidates details are considered for further progression through the recruitment process. Subsequently the consequences for the candidate would be that their details would not be processed by the company and they would not be successful in their application for the advertised job.

Profiling/ Assessments

As a candidate we might ask you to participate in assessment, complete tests or occupational personality profile questionnaires for certain job opportunities where prospective employers request it. If you are required to do so the company we use is CEB (SHL). They provide the online testing to us and we will send you a link to the test for completion. Your answers will be provided to and held by CEB and a copy sent to us and the prospective employers.

Data Subject Rights

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

- The right to be informed
- The right of access - to the personal data the company processes on you via a Subject Access Request (SAR). You will be asked to verify your identity or asked for more information about your request
- The right to rectification - of your personal data you can ask us to confirm what information we hold at any time and can request us to update or change such information
- The right to erasure - of your personal data in certain circumstances. We will respond to your request within 28 days (although we may be allowed to extend this period in certain cases) and will only

disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data

- The right to restrict processing - of your personal data. Where you would not like us to process your details but happy that we can keep them to ensure we do not contact you. That way, we will minimise the chances of you being contacted in the future where your data is collected in unconnected circumstances
- 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 and you do not agree with the processing, you have the right to object. We will respond to your request within 28 days (although we may be allowed to extend this period in certain cases)
- 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 the Company processing your sensitive personal data you have the right to withdraw that consent at any time by contacting:

Compliance@escaperecruitment.com

01506 461445

Complaints or queries

If you wish to complain about this Privacy Notice or any of the procedures set out in it please contact:

Compliance@escaperecruitment.com

01506 461445

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.