

## Hampton's Resourcing Privacy Policy

### Introduction

Hampton's Resourcing Limited (Hampton's) are committed to complying with the General Data Protection Regulation (**GDPR**) and Data Protection Act 1998. This Privacy Policy explains what we do with your personal data whether we are supporting you in seeking a role, continuing a relationship with you once we have found you a role, providing you with a service, receiving a service from you, using your data to ask for your assistance in relation to one of our **Candidates** or you are visiting our website.

This policy advises how we collect, use and process your personal data and how, in doing so, we comply with our legal obligations. We are committed to continuously protecting and safeguarding your privacy rights.

This policy applies to the personal data of our **Website Users, Candidates, Clients, Suppliers** and any other individuals whom we may contact in order to find out more about our **Candidates** or whom they indicate is an emergency contact.

Please be advised that we may amend or update this policy as and when required. If you would like a copy of the most recent policy, please do not hesitate to contact us for a copy.

If you are dissatisfied with any aspect of this policy, you may have legal rights and, where relevant, we have included these within this policy.

### The Hampton's Resourcing Privacy Policy

The information we collect from you helps us to accomplish our contractual duties to all our customers. In some cases, the data is required by statute or other laws (for example, a **Candidates** NI Number and religious affiliation). Other data is required just to ensure our services run smoothly.

Depending on the type of data in question (i.e. those not required by law) and the grounds in which we may be processing it, should you decline to provide us with any data we have requested, we may not be able to fulfil our contractual requirements or, in extreme cases, continue our services to you.

### Our Legal Bases for Processing Your Data

#### *What Kind of Personal Data Do We Collect?*

##### **Candidate Data**

To allow us to inform you of relevant employment opportunities that are tailored to you, we may need to collect all, or some, of the data listed below in addition to any personal data we are required to process by law. We tailor our employment opportunities in accordance to your circumstances and interests. We will only request data that will help us to help you, such as your;

- Name
- Age and date of birth
- Gender
- Marital status
- Photograph

- Contact details
- Education details
- Employment history
- Emergency contact details
- Referee details
- Immigration status (whether you require a work permit)
- Nationality / citizenship / place of birth
- A copy of your driving licence and/or passport
- Financial information (to process payments and/or where necessary to carry out financial checks)
- National insurance number (and any other tax related information)
- Diversity information (including racial or ethnic origin, religious or similar beliefs and physical/mental health including disability-related information)
- Details of any criminal convictions (if this is required for a role you are interested in applying for)
- Details about your current remuneration, pensions and benefit arrangements
- Information on your interests and needs regarding future employment (collected both directly and inferred – i.e. from jobs viewed on our website)
- Any extra information you choose to tell us
- Any extra information that your referees choose to tell us about you
- Any extra information that our **Clients** may tell us about you or that we find from other third-party sources such as job sites
- IP Address
- Dates, times and the frequency in which you access our website services; and
- CCTV footage if you attend our premises

Please be advised that the above list of categories of personal data we may collect is not exhaustive.

### **Client Data**

If you are a customer of Hampton's, we may need to collect information about you, or individuals within your organisation whilst providing our services such as;

- Finding **Candidates** who are the right fit for your organisation
- Providing you with a managed service provider (**MSP**) programme
- Providing you with Recruitment Process Outsourcing (**RPO**) services
- Providing you with content published by Hampton's which is expected to be relevant and/or useful to you

The list of data required is limited as we generally only require your contact details or the details of individual contacts within your organisation. This may include their;

- Name
- Email address
- Telephone number
- Any other information they choose to tell us

These details will enable us to ensure that our relationships run smoothly. If we require any additional personal data for any reason, we will advise you of this.

### **Supplier Data**

If you are a supplier of Hampton's, we may need to collect information about you, or individuals within your organisation to allow us to ensure a smooth relationship. This list is limited as we generally only require your contact details or the details of individual contacts within your organisation. This may include their;

- Name
- Email address
- Telephone number
- Any other information they choose to tell us
- Bank details (to allow us to pay you)

### Website Users

We collect limited data from our **Website Users**. However, the data we do collect, allows us to improve your experience when using our website as well as enabling us to manage the services. This data includes;

- How you use our website (e.g. the language you choose to view it in)
- The times our website is most popular
- The frequency of your visits
- Browser type
- Your location when viewing our website

If you contact us via the website, we will collect any information that you supply to us for example your name and contact details.

### Other Contacts (Including Referees and Emergency Contacts)

It is important to us to ensure that we provide our **Candidates** with suitable employment opportunities safely and securely. We only request from them limited contact details, so that we can contact referees and emergency contacts.

To allow us to confirm employment details with a referee, our **Candidates** are asked to supply us with your name and contact details.

Should a **Candidate** have given us your name and contact details as an emergency contact, it is so that we can contact you in the event of an accident or emergency.

### *How Do We Collect Your Personal Data?*

#### Candidate Data

There are three main ways in which we collect your personal data;

1. Directly from yourself  
Hampton's needs to know certain information in order to provide you with the best service. It will allow us to tailor our searches and provide you with suitable opportunities. We may request this information in a variety of ways including;
  - Entering your details on our website
  - Entering your details on a Hampton's micro-site
  - Via an application form as part of our registration process
  - Receiving your CV at a recruitment event, job fayre or in our office
  - Providing your details to a consultant (i.e. via social media or via email)
  - Applying for jobs via a job board
  - Entering a competition via a social media channel
2. From **Third Parties**  
We may also receive your data from a **Third Party** source in the following situations;
  - Your referee disclosing personal information about you
  - Our **Clients** may share personal information about you to us
  - Obtaining your details from searching for potential **Candidates** from **Third Party** sources (i.e. social media platforms or job boards)

- If you like the company or any of our consultant's social media pages (i.e. Twitter or LinkedIn) we may receive your personal information
  - If you were referred to us via an **RPO** or **MSP** supplier, they may share your personal information with us.
3. Data that is collected automatically  
Should you visit our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or from you providing it to us.

## Client Data

There are three main ways in which we collect **Client** personal data;

1. Directly from yourself  
We are dedicated to ensuring that you have the best **Candidates** for your roles and we will receive data directly from you in two ways;
  - Where you have contacted us via phone or email
  - Where we have contacted you by phone, email or through one of our consultant's business development activities
2. From **Third Parties**  
Where appropriate and in accordance with local laws, we may require further information about you or your colleagues from other sources;
  - From **Third Party** market research and analysing online and offline media (this may be outsourced or carried out internally)
  - From delegate lists at recruitment events
  - From other limited sources and **Third Parties** (i.e. should a **Candidate** supply your details as a reference)
3. Data that is collected automatically  
Should you visit our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or from you providing it to us.

## Website Users

Your data is collected automatically via Cookies when you visit our website according to the cookie settings you have in your browser. We will also collect data from you when you contact us via the website.

Further information on the types of Cookies used can be found further down in this document.

## *How Do We Use Your Personal Data?*

### Candidate Data

We generally use your data in four ways;

1. Recruitment Activities  
The main reason for collating your personal details is to ensure that we find you suitable employment. The more information we have about you, the more bespoke we can make our searches. The below list advises on the various ways we may use and/or process your data for this activity (this list is not exhaustive);
  - Collecting your data from you directly and via **Third Party** sources (i.e. social media and job boards)

- Storing your data (and ensuring they are up-to-date) on our database to allow us to contact you about recruitment
- Providing you with our services and to facilitate the recruitment process
- Assessing your data against vacancies we think may be suitable for you
- Sending information about you to **Clients** in order to put you forward for a role and assess your eligibility
- To enable you to submit your CV, apply online or to subscribe to alerts about roles we think may interest you
- Allowing you to participate in online training (when applicable)
- Allowing you to participate in interactive features (when applicable)
- Carrying out our obligations arising from contracts between us and yourself
- Facilitating our payroll and invoicing processes between us and **Third Parties** (i.e. umbrella companies and our accountancy firm)
- Carrying out surveys
- Verifying details in which you have provided using **Third Party** resources (i.e. psychometric evaluations), or to request information such as references, qualifications etc. to the extent it is appropriate in accordance to local laws
- Complying with legal obligations in connection with the detection of crime or the collection of taxes or duties
- Processing your data to enable us to send you targeted, relevant marketing materials or other communications we believe to be of interest to you
- Carrying out our obligations arising from contracts between us and any **Third Parties** in relation to your recruitment

## 2. Marketing Activities

We may send you information that we think you may find interesting or to ask you for your help in connecting other **Candidates** with jobs. We may use your data for the purposes listed below where appropriate and in accordance with local laws and requirements (this list is not exhaustive) to:

- Enable us to develop and market products and services
- Market our recruitment services (e.g. permanent and temporary)
- Send you details of reports, offers, promotions, networking and **Client** events and general information about the industry sectors
- Display promotional excerpts from your details on our website as a success story (only where we have obtained your consent to do so)

We need your consent to carry out some aspects of these activities which are not covered by our **Legitimate Interests** (in particular, the collection of data via Cookies, and the delivery of marketing to you through digital channels). Depending on the situation, we will ask for this via an opt-in or opt-out option. Opt-in is a type of consent in which applies where you have previously engaged with us (i.e. via an application). We will take your consent as given unless or until, you opt-out. Please be advised that should you opt-out, you may miss out on us being able to find you a new position. For other types of e-marketing, we are required to obtain your explicit consent.

If you are not happy about our approach to marketing, you have the right to withdraw your consent at any time. Please be advised, that even if you have opted out from our marketing communications, it is possible that your details can be recaptured through public sources in an unconnected marketing campaign. We will try to ensure that this doesn't happen.

Our marketing is based on what we think will be relevant to our **Candidates** and **Clients** but understand this may not be right for everyone. If you do not wish us to use

your data to show you adverts, please turn off the 'Advertising Cookies' option. If you continue to see advertisements about Hampton's, it will not have been targeted at you personally, but rather at an anonymous audience.

3. Equal Opportunities Monitoring

We strive to ensure that our recruitment process is aligned with our approach to equal opportunities. Some of the data we may collect about you comes under the umbrella of 'diversity information' in appropriate circumstances and in accordance with local law (this information could be about your ethnic background, gender, disability, age, sexual orientation, religion or other beliefs and/or social economic background).

We will use this information on an anonymised basis to monitor our compliance with our equal opportunities policy. We may also disclose this data (suitably anonymised where relevant) to **Clients** where we are contractually required to, or where the **Client** requests such information to comply with their own employment processes.

This type of data is called 'sensitive' personal information and slightly stricter data protection rules apply to it. Therefore, we must obtain your explicit consent before we can use it.

We may also collect other sensitive data such as health-related information, religious affiliation or details of any criminal conviction if it is appropriate in accordance with local laws and is required for a role that you are interested in applying for.

If you are not happy with this, you have the right to withdraw your consent at any time. The details of how to do this are further down within this document.

4. To establish, exercise or defend **Legal Claims**.

In more unusual circumstances, we may use your personal data to help us establish, exercise or defend **Legal Claims**.

Where appropriate, we will always seek your consent to carry out some or all of the above activities.

### **Client Data**

The main reason for using information about **Clients** is to ensure that our relationship runs smoothly by ensuring our contractual arrangements are properly implemented. This may involve:

- Identifying **Candidates** who we think will be suitable for your organisation
- Providing you with an **MSP** programme (or assisting another organisation to do so)
- Providing you with **RPO** services (or assisting another organisation to do so)

The more information we have, the better the service we can provide.

We also use **Client** data for:

1. Recruitment Activities

Our main focus is recruitment through providing you with **Candidates**, **RPO** Services and **MSP** programmes. There are various ways in which we use your data to facilitate this including;

- Storing your details and updating them periodically on our database so that we can contact you in relation to recruitment activities



- Keeping records of our conversations and meetings, so that we can provide targeted services to you
- Undertaking customer satisfaction surveys
- Processing your data for the purposes of targeting appropriate marketing campaigns

We may use this data for these purposes if we deem this to be necessary for our **Legitimate Interests**.

If you are not happy about this, in certain circumstances, you have the right to object.

## 2. Marketing Activities

We will not, as a matter of course and subject to any applicable local laws and requirements, seek your consent when sending marketing materials such as our company newsletter to a corporate postal or email address.

If you are not happy about this, you have the right to opt out of receiving marketing materials from us.

## 3. To help us establish, exercise or defend **Legal Claims**

In more unusual circumstances, we may use your personal data to help us establish, exercise or defend **Legal Claims**.

## Supplier Data

We use your data to ensure that the contractual arrangements between us are correctly implemented and to comply with legal requirements. We will use your information:

- To store (and update when necessary) your details on our database, so that we can contact you in relation to our contracts
- To offer services to you or obtain services from you
- To help us target appropriate marketing campaigns
- In more unusual circumstances, we may use your personal data to help us establish, exercise or defend **Legal Claims**.

We may use your data for these purposes if it is deemed to be necessary for our **Legitimate Interests**. We will not as a matter of course, seek your consent when sending marketing messages to corporate postal or email addresses.

If you are not happy about this, you have the right to opt out of receiving marketing materials from us.

## Website Users

We use your data to help us improve your experience when using our website (e.g. by analysing your recent job search criteria to help us present jobs or **Candidates** to you).

## Other Contacts

We will only use the information provided to us by our **Candidates** for the following purposes:

- If our **Candidates** put your details down as an emergency contact, we will contact you in the case of an accident or emergency affecting them  
Or
- If you were put down as a referee, we will contact you in order to take up a reference. This is an important part of our **Candidate** safeguarding process and could be the difference between the individual getting a job or not.

We may use your data for these purposes if we deem this to be necessary for our **Legitimate Interests**.

If you are not happy about this, you have the right to opt out of receiving marketing materials from us.

### *Who Do We Share Your Personal Data With?*

We may share your data with various parties in various ways for various reasons in accordance with local laws and requirements with the following categories of people;

- Any of our group companies
- Individuals and organisations who hold information related to your reference or application to work with Hampton's, such as past or prospective employers, educators and examining bodies and employment/recruitment agencies
- Tax, audit or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (e.g. due to a request by a tax authority or in connection with any anticipated litigation)
- **Third Party** service providers who perform a function on our behalf including;
  - External consultants
  - Business associates
  - Professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems.
- **Third Party** outsourced IT and document storage providers, where we have an appropriate processing agreement (or similar protections) in place
- Marketing technology platforms and **Suppliers**
- In the case of our **Candidates** and our **Candidate's** prospective members of Staff Referees; **Third Parties** who we have retained to provide services such as a reference, qualification and criminal convictions check to the extent that these checks are appropriate and in accordance with local laws
- Should Hampton's merge or be acquired by another business or company in the future (or is in meaningful discussions about such possibilities) we may share your personal data with the (prospective) new owners of the business or company.

### **Candidate Data**

Primarily, we will share some of your data with prospective employers to increase your chances of securing the role. Unless you specify otherwise, we may also share your information with any of our group companies and associate **Third Parties** such as our services providers where we feel this will help us to provide you with the best possible service. In addition to the above listed we will share your data with;

- Potential employers and other recruitment agencies/organisations to increase your chances of finding you employment
- **Third Party** partners, job boards and job aggregators where we consider this will improve the chances of finding you employment
- **MSP Suppliers** as part of our **Clients** 'MSP Programmes'

### **Client Data**

We will share your data primarily to ensure that we provide you with a suitable pool of **Candidates**, to provide you with an **MSP** programme (or assist another organisation to do so) and/or to provide you with **RPO** services (or assist another organisation to do so). Unless you specify otherwise, we may share your information with any of our group companies and associated **Third Parties**, such as our service providers, to help us meet these aims.



### **Supplier Data**

Unless you specify otherwise, we may share your information with any of our group companies and associated **Third Parties** such as our service providers and organisation to whom we provide these services.

### **Website Users**

Unless you specify otherwise, we may share your information with providers of web analytics services, marketing automation platforms and social media services to make sure any advertising you receive is targeted to you.

### **Other Contacts**

Unless you specify otherwise, we may share your information with any of our group companies and associated **Third Parties** such as our service providers and organisation to whom we provide these services.

### *How Do We Safeguard Your Personal Data?*

We are dedicated to protecting your personal data and have put in place appropriate measures to prevent any unauthorised access to, and misuse of, your personal data. We have in place a range of appropriate technical and organisational measures to deal with any suspected data breaches.

If you suspect any misuse or loss of unauthorised access to your personal information, please let us know immediately.

### *How Long Do We Keep Your Personal Data For?*

The length of time in which we store your personal data is dependent on the services we provide to you and for how long. As we often support candidates in finding roles over a number of years, the purpose in which we retain data is usually an on-going process. We conduct regular data audits to ensure that your data is accurate and relevant.

For those **Candidates** whose services are provided via a third-party provider or other entity, 'meaningful Contact' with you means meaningful Contact with the company or entity which supplies your services.

Where we refer to 'meaningful contact', we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our online services. If you are a **Candidate**, we will consider there to be meaningful contact with you if you submit your updated CV on to our website. We will also consider it meaningful contact if you communicate with us about potential roles, either by verbal or written communication or click through from any of our marketing communications. Your receipt, opening or reading of an email from us, will not count as meaningful contact – this will only occur in cases where you click through or reply directly.

### *How Can You Access, Amend or Retract the Personal Data You Have Provided to Us?*

The **GDPR's** main objective is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This therefore means, that you have various rights in respect of your data. These are described as follows;

#### *Right to Object*

This right enables you to object to us processing your personal data where we do so for one of the following four reasons;

1. Our **Legitimate Interests**

2. To enable us to perform a task in the public interest or exercise official authority
3. To send you direct marketing materials
4. For scientific, historical, research or statistical purposes

The **Legitimate Interests** and direct marketing categories above are the ones most likely to apply to our **Candidates, Clients, Suppliers** and **Website Users**. If your objection relates to us processing your personal data because we deem it necessary for your **Legitimate Interests**, we must act upon your objection by ceasing the activity in question unless:

- We can prove that we have compelling legitimate grounds for processing which overrides your interests  
Or
- We are processing your data for the establishment, exercise or defence of a legal claim

If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

#### *Right to Withdraw Consent*

Where we have obtained your consent to process your personal data for certain activities (e.g. for our marketing arrangements or automatic profiling), you may withdraw this consent at any time and we will cease to carry out that particular activity that you previously consented to unless we consider there to be an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

If you would like to discuss these rights further, please contact us. We will strive to respond to your request without delay and in any event, within one month (subject to any extensions to which we are lawfully entitled). Please note, that we may keep a record of your communication to help us resolve any issues you raise.

#### *Data Subject Access Requests (DSAR)*

You may ask us to confirm what information we hold about you at any time and request us to update, modify or delete such information. We may ask you to confirm your identity and request more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is 'manifestly unfounded or excessive'.

If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. If we refuse your request, we will always tell you the reason for doing so.

We comply with all local law requirements regarding data subject access requests and may refuse your request in accordance with such laws.

#### *Right to Erasure*

You have the right to request that we erase your personal data in certain circumstances which usually must meet one of the following criteria:

- The data is no longer relevant for the purpose for which we originally collected and/or processed them
- Where previously given, you have withdrawn your consent to us processing your data and there is no valid reason for us to continue to process this information
- The data has been processed unlawfully (i.e. in a manner which does not comply with **GDPR**)
- It is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller

- If we process the data because we believe it necessary to do so for our **Legitimate Interests**, you object to the processing and we are unable to provide an overriding legitimate ground for continued processing

We would only be entitled to refuse to comply with your request for one of the following reasons:

- To exercise the right of freedom of expression and information
- To comply with legal obligations or for the performance of a public interest task or exercise of official authority
- For public health reasons in the public interest
- For archival, research or statistical purposes
- To exercise or defend a legal claim

#### *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:

- You consent
- 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
- One of the circumstances listed below is resolved

The circumstances in which you are entitled to request that we restrict the processing of your personal data are:

- Where you dispute that the personal data is not accurate. In this instance, our processing of data will be restricted for the period during which the accuracy of the data is verified
- Where you object to us processing your data for our **Legitimate Interests**. In this instance, you can request that the data be restricted whilst we verify our grounds for processing your personal data
- Where our processing of data is unlawful, but you would prefer us to restrict our processing rather than erasing it
- Where we have no further need to process your data, but we require the data to establish, exercise or defend **Legal Claims**

Where 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 notify you before lifting any restriction on processing your personal data.

#### *Right to Rectification*

You have the right to request that we rectify any inaccurate or incomplete personal data. If we have shared this data with **Third Parties**, we will notify them about the rectification unless this is impossible or required disproportionate effort. Where appropriate, we will also notify you as to which **Third Parties** we have disclosed the inaccurate or incomplete data to. Where we think that it is reasonable for us to not 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. This means that you are able to transfer your account 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

(e.g. CSV file) that is password protected so that you can transfer the data. This right of portability applies to:

- Personal data that we process automatically
- Personal data provided by you
- Personal data that we have processed based on your consent or to fill a contract

#### *Right to Lodge a Complaint with a Supervisory Authority*

You have the right to lodge a complaint with your local supervisory authority.

If, at any time, you would like to exercise any of these rights or withdraw your consent to the processing of your data (where consent is our legal basis for processing your personal data), details of how to contact us can be found further down in this document. Please note, that we may keep a record of your communications to help us resolve any issues you raise.

It is extremely important that the information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

#### *Who Is Responsible for Processing Your Personal Data on the Hampton's Website?*

Hampton's controls the processing of personal data on its websites and microsites.

#### *How Do We Store and Transfer Your Data Internationally?*

To allow us to provide the best service, your data may be transferred:

- Between and within Hampton's entities
- To **Third Parties** (such as advisers or other **Suppliers** to the business)
- To overseas **Clients**
- To **Clients** within your country who may transfer your data international
- To a cloud-based storage provider
- To other **Third Parties** as referred to previously

We strive to ensure that your data is stored and transferred securely. Therefore, we will only transfer your data outside of the **European Economic Area (EEA)** where it is compliant with data protection legislation and the means of transfer provides adequate safeguards, for example:

- By way of a data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in the jurisdictions without adequate data protection laws
- By signing up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the USA or any relevant agreement in respect of other jurisdictions
- Transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that countries level of data protection via its legislation
- Where it is necessary for the conclusion or performance of a contract between ourselves and a **Third Party** and the transfers are in your interests for the purpose of the contract (e.g. if we need to transfer data outside the EEA to meet our obligations under that contract if you are a **Client** of ours)
- Where you have consented to the data transfer

To ensure that your personal data receives an adequate level of protection, we have implemented appropriate procedures with the **Third Parties** we share your personal data with to ensure your data is treated by those **Third Parties** in a way that is consistent with and which respects the law on data protection.

### *Our Legal Bases for Processing Your Data*

#### **Legitimate Interests**

Article 6 (1) (F) of the **GDPR** law, is relevant to Hampton's. It advises, that we are able to process your data where it "is necessary for the purposes of the **Legitimate Interests** pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

Below outline's the activities carried out to process your data which we believe does not prejudice individuals but allows Hampton's to offer a better service.

You have the right to object to us processing your data on this basis. You can find more information on this above, in the 'Right to Withdraw Consent' section.

#### **Candidate Data**

We believe that if individuals are seeking employment or have posted your CV and information on a job board or networking site, it is reasonable for us to collect your data and use this to offer (or provide) our services to you. This includes sharing your information with prospective employers and to compare your skills against vacancies. Once we have found you a roll, ourselves, or your prospective employer, may want to check any information you have provided us with, such as references, qualifications or criminal record checks in accordance with local laws.

We want to ensure that we provide you with relevant articles and job recommendations to help you with your search and therefore think it is reasonable to process your data to ensure we send you appropriate items.

Where provided, we also use your data to put you forward for our online training courses and interactive activities (such as psychometric tests) which may help with your job search.

In most cases, we will also use your data for internal administrative activities such as payroll and invoicing.

Finally, we have obligations that we must abide by under the law and it is therefore a **Legitimate Interest** of ours to meet you. We may need to share your data in connection with crime detection, tax collection or actual/anticipated litigation.

#### **Client Data**

We deem it reasonable to store personal data and the data of individual contacts within the organisation to ensure we provide various recruitment services to you. We may track conversations, meetings, roles you have provided us with and placements we have made with you.

#### **Supplier Data**

We believe it is our legitimate interest to store personal data of individuals within the organisation to allow us to facilitate the receipt of services. We will also store your financial details to allow us to process payments for your services.

## Other Contacts

If your details have been provided to us as an emergency contact, we will use your data to contact you in case of an accident or emergency.

If your details have been provided to us as a referee, we will use your data to contact you for a reference. We request a reference as part of our safeguarding procedures and deem this to be within our **Legitimate Interests**.

## Consent

Article 4 (11) of the **GDPR** advises that consent (also known as opt-in) is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her." This therefore means that:

- You must give us your consent freely, without us putting you under any pressure
- You must understand what you are consenting to
- You have control over which processing activities you consent to and which you don't
- You need to take positive and affirmative action in giving us your consent

We will keep records of your consent.

We will mainly rely on using an opt-in / opt-out system. We are able to provide marketing products/services which are related to recruitment as long as you have not actively selected to opt-out.

You have the right to withdraw your consent at any time.

### *Establishing, Exercising or Defending Legal Claims*

Article 9 (2) of the **GDPR**, allows us to process data where it "is necessary for the establishment, exercise or defence of **Legal Claims** or whenever courts are acting in their judicial capacity". Therefore, in some cases, we may be required to process personal data in connection with exercising or defending **Legal Claims**.

An example of this is 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.

## Cookies Policy

### *What Are Cookies and How Do We Use Them?*

A 'Cookie' is a piece of data that is stored on your computer's hard drive and is used by nearly all websites. These Cookies do not harm your system. Hampton's uses these cookies to track your activity and to ensure you gain a high level of experience when visiting our website.

We mainly use the cookies for two purposes:

1. To track your use of our website.  
It allows us to understand how you use our website and to track patterns to help us develop and improve the site and services in response to what you want and need
2. To help us advertise roles that we think you'll be interested in.



There are two types of cookies:

1. **Session Cookies:** Stored on your computer during your web session and automatically deleted when you close your browser. They usually store an anonymous ID session which allows you to browse a website but does not collect any information
2. **Persistent Cookies:** Stored as a file on your computer and remains there when you close the web browser. This cookie can be read by the user whom created it and when you visit the website again. This is the type of cookie Hampton's uses for Google Analytics and for personalisation

Cookies can be categorised as follows:

- **Strictly Necessary:** Essential to enable you to use the website effectively and cannot be turned off. Without these cookies, the services on the website cannot be provided. These cookies do not gather information that could be used for marketing or analytics.
- **Performance Cookies:** These enable us to monitor and improve the performance of our website (e.g. count visits, identify traffic sources etc.)
- **Functionality Cookies:** These allow our website to remember your preferences (i.e. language, username etc.) and provide enhanced features. They may also be used to provide services you have requested. The information collected is usually anonymised.
- **Personalisation Cookies:** Help us to advertise details of potential roles we think may interest you. These cookies are persistent for however long you are registered with us and mean that when you return, you may see advertising similar to what you have viewed previously.

If you would like to check or amend the type of cookies you accept, you can alter these within your browser settings.

If you do not want to receive cookies that are not required to perform the basic features on our site, you may choose to opt-out by amending your browser settings.

## How to Contact Us

### *Hampton's Resourcing*

You may wish to contact us for the following reasons:

- To access, amend or retract the personal data you have provided us with
- If you suspect any misuse, loss or unauthorised access to your personal data
- To withdraw your consent to the processing of your data (where consent is the legal basis on which we process your personal data)
- With any comments or suggestions regarding this Privacy Policy

You can contact us as follows:

Telephone: 01926 353 999

Email: [Directors@hamptonsresourcing.com](mailto:Directors@hamptonsresourcing.com)

Writing: Hampton's Resourcing, Unit 3 Jephson Court, Tancred Close, Leamington Spa, CV31 3RZ

Country in which our services are used (Jurisdiction):	UK
Entity responsible for processing data of <b>Website Users</b> :	Hampton's Resourcing Limited
Entity responsible for processing personal data:	Hampton's Resourcing Limited

### *Your Local Supervisory Authority*

You may wish to use your local supervisory authority whom in the UK is The Information Commissioner's Office (ICO).

You can contact them as follows:

Telephone: 03031 231113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Writing: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## Variations to The Privacy Policy

Where your personal data is processed in accordance with the fair processing conditions relating to our rights and obligations under employment and social security law, this relate our processing of your data as necessary for compliance and legal obligations. This ensures that we process statutory sick pay, comply with the statutory employment protections, comply with health and safety laws and ensure appropriate National insurance contributions are made where applicable.

## Descriptions

<b>Candidates</b>	Relates to applicants for roles advertised and promoted by Hampton's whether this is for a permanent, temporary, freelance or part-time role with our Clients. Candidates also relate to those whom have supplied a CV to us not in relation to a specific role. For the purpose of this Privacy Policy, those individuals (including contractors, freelance workers, employees of Suppliers or other Third Parties) put forward for roles with Hampton's as well as Clients part of an MSP offering or otherwise, will be treated as Candidates.
<b>Clients</b>	Relates to customers, Clients and others whom Hampton's provides services to in the course of its business.
<b>EEA</b>	EEA stands for the European Economic Area. The Member States of the European Union together with Norway, Iceland and Liechtenstein.
<b>GDPR</b>	GDPR stands for the General Data Protection Regulation, a European statutory instrument which is aiming to harmonise European data protection laws. This comes in to effect on the 25th May 2018. Any reference to it should be construed accordingly to include any national legalisation implementing it.
<b>MSP</b>	MSP stands for Managed Service Provider Programmes. A Client outsourcing service for the management of external Staff (including freelance workers, independent contractors and temporary employees) to an external recruitment provider (i.e. Hampton's).
<b>Other Contacts</b>	This may include emergency contacts and referees. We will only contact them in appropriate circumstances.
<b>RPO</b>	RPO stands for Recruitment Processing Outsourcing Services. This is the full or partial outsourcing of the recruitment process of permanent employees to a recruitment provider (i.e. Hampton's).
<b>Staff</b>	This includes employees and interims whom are engaged directly with Hampton's (or whom have accepted an offer to be engaged) as well as

other workers engaged in the business providing services to Hampton's (even when not classed as employees).

This also includes employees who are engaged to work on Clients' premises under the terms of RPO and MSP agreements. Staff does not include those hired by Hampton's for the purpose of being placed with Clients outside of RPO and MSP agreements. For these members of staff, they will be treated as Candidates and are covered by this Privacy

Policy. Independent contractors and consultants providing services to Hampton's will be treated as Suppliers for the purpose of this policy.

**Suppliers**

Relates to partnerships and companies (including sole traders) and atypical workers (including independent contractors and freelancers) who provide services to Hampton's. In some circumstances, Hampton's will sub-contract the services to Clients and third-party Suppliers whom perform services on behalf of Hampton's. Individual contractors, freelancers or employees of Suppliers will be treated as Candidates for data protection purposes. Suppliers are required to communicate with relevant parts of this policy (namely sections directed at Candidates) to their employees.

**Website Users**

An individual who accesses any Hampton's website or microsites.