

PUBLIC USE
talentED Recruiters Limited
External Privacy Notice

Last Updated: 1st September 2023

Document Control

OWNER	The Data Protection Manager
APPROVER	The Executive Committee
CLASSIFICATION	Public Use
DATE OF ISSUE	01.09.2023
ISSUE	v1.0
REASON FOR ISSUE/UPDATE	Final Version
LAST REVIEW/UPDATE	September 2023
NEXT REVIEW	September 2024
DISTRIBUTION	Internal / External

VERSION	AUTHOR	SUMMARY OF CHANGES	DATE
0.1	Evalian Limited	First Issue (Draft)	17.08.2023
1.0	Evalian Limited	Final Version	01.09.2023

Document Release:

This document remains the property of talentED Recruiters Limited. Release to regulatory authorities is permitted as required. Release to other organisations or individuals may only be authorised by Company Directors.

Who we are and what we do

We are talentED Recruiters Limited (“talentED”, “us”, “we”, “our”). We are a private limited company registered in England and Wales under registration number 05659158 and we have our registered office at The Cedars, Church Road, Ashford, Kent, England, TN23 1RQ.

We are registered with the UK supervisory authority, Information Commissioner’s Office (“ICO”) in relation to our processing of Personal Data under registration number ZA810496.

Unless we notify you otherwise, we are the controller of the Personal Data we process about you. This means that we decide what Personal Data to collect and how to process it.

As one of the HR GO plc group companies, we place great importance on ensuring the quality, confidentiality, integrity, and availability of the data we hold, and in meeting our data protection obligations where we process personal data.

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the ‘How to contact us’ section.

Who this privacy notice applies to

This privacy notice applies to you if:

- You visit our website
- You enquire about our products and/or services
- You are an existing client
- You contact us by email, telephone or by using our online contact form
- You sign up to receive newsletters and/or other promotional communications from us

For candidates that are either registering with us or applying for vacancies through our website, please read our candidate privacy notice.

Candidates expressing an interest in working for talentED directly will receive a separate privacy notice.

What Personal Data is

“Personal Data” means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

‘Special Category Personal Data’ is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone’s sex life or sexual orientation. Personal Data’ means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

Personal Data we collect

The type of Personal Data we collect about you will depend on our relationship with you. For the type of Personal Data we collect, see the table below in the section entitled 'Purposes for which we use personal data and the legal bases.'

How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone, text or email and/or via the contact form on our website.

However, we may also collect your Personal Data from third parties such as:

- reputable companies who provide lead generation contact lists;
- others to whom you have provided consent;
- publicly available sources such as social media platforms;
- sub-contractors in technical, payment and delivery services;
- advertising networks;
- analytics providers; and
- search information providers

Purposes for which we use personal data and the legal bases

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:

Purpose	Lawful Basis for Processing
Responding to correspondence from you.	It is in our legitimate interest to respond to enquiries made via our website contact forms, by email, through our social channels or any other means.
Sending you information on events or product information which may be of interest.	<p>If you are an existing client or have expressed an interest in our products or services, we will rely on legitimate interests to contact you for marketing purposes.</p> <p>You may object to the processing for this purpose by emailing dataprotection.jv@hrgo.co.uk. If we have captured your consent for the purposes of marketing, that consent may be withdrawn at any time by emailing dataprotection.jv@hrgo.co.uk or using the unsubscribe option.</p>
Provision of our products and/or services.	Processing is necessary for the performance of the contract between us.

Purpose	Lawful Basis for Processing
To maintain a record of contact for current client engagement.	It is our legitimate interest to maintain a record of the contact we have with you within our client database.
Business management, forecasting and statistical purposes.	It is our legitimate interest to identify areas for managing current business relationships, develop new products and services, and for managing our business.
Improving our websites and the overall website visitor and user experience	It is our legitimate interest to allow analytics and search engine providers to help improve and optimise our websites.
Improving our websites and the overall website visitor and user experience.	We use cookies on our websites with your consent.

Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

Sharing your Personal Data

We may also disclose your information to third parties in connection with other purposes set out in this privacy notice. These third parties may include:

- business partners, suppliers and sub-contractors who may process information on our behalf
- advertisers, social media platforms, and advertising networks
- analytics and search engine providers
- IT service providers

This site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our site, we encourage you to read the privacy policy of every website you visit.

Where we are under a legal or regulatory duty to do so, we may disclose your details to the police, regulatory bodies or legal advisors, and/or, where we consider necessary to protect the rights, property or safety of talentED, its personnel, users or others.

International Transfers

Your Personal Data may be processed outside of the UK. This is because the organisations we use to provide our service to you are based outside the UK.

We have taken appropriate steps to ensure that the Personal Data processed outside the UK has an essentially equivalent level of protection to that guaranteed in the UK. We do this by ensuring that:

- Your Personal Data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation) or
- We enter into an International Data Transfer Agreement (“IDTA”) with the receiving organization and adopt supplementary measures, where necessary. (A copy of the IDTA can be found here [international-data-transfer-agreement.pdf \(ico.org.uk\)](https://ico.org.uk/international-data-transfer-agreement.pdf))

How long we keep your data

We will retain your personal data for the duration of our relationship and/or as long as is necessary to provide you with our services. Personal data will also be retained for a reasonable period thereafter to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your personal data will be securely deleted or anonymised, for example by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis and business planning.

How we protect your data

We implement appropriate technical and organisational measures to protect data against unauthorised or unlawful processing and against accidental loss, destruction or damage.

In addition to the technical and organisational measures we have put in place, there are simple things you can do to in order to further protect your personal information, such as:

- Never share One Time Passcodes (OTPs).
- Never enter your details after clicking on a link in an email or text message.
- Always send confidential information by encrypted email to reduce risk of interception.
- If you’re logged into any online service do not leave your computer unattended.
- Close down your internet browser once you’ve logged off.
- Never download software or let anyone log on to your computer or devices remotely, during or after a cold call.
- You can easily identify secure websites by looking at the address in the top of your browser which will begin `https://` rather than `http://`.

Your data protection rights

talentED would like to make sure you are fully aware of your rights. We will always ensure, no matter where you are located in the world, that we adhere to and fully respect your data protection rights.

You have the following rights if you are located in the UK or EU:

Rights	Description
Right to be informed	Individuals have the right to be informed about the collection and use of their personal data.
Right of access	Individuals have the right to receive a copy of their personal data, and other supplementary information.

Rights	Description
Right to rectification	Individuals have the right to have inaccurate personal data rectified or completed if it is incomplete.
Right to erasure (the 'right to be forgotten')	Individuals have the right to request their personal information to be erased, in certain circumstances.
Right to restrict processing	Individuals have the right to request the restriction or suppression of their personal data, in certain circumstances, in particular: <ul style="list-style-type: none"> • if your data is not accurate; • if your data has been used unlawfully but you do not want us to delete it; • if your data is no longer needed, but you want us to keep it for use in legal claims; or • if you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request.
Right to data portability	Individuals have the right to obtain and reuse their personal data, in a machine-readable format, for their own purposes across different services, in certain circumstances.
Right to object	Individuals have the right to object to the processing of their personal data, in certain circumstances. Where we are using your personal data because it is in our legitimate interests to do so, you can object to us using it this way. Where we are using your personal data for direct marketing, including profiling for direct marketing purposes, you have an absolute right to ask us to stop doing so.
Rights with respect to automated decision-making and profiling	Individuals have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

In addition to the above, an individual also has the following rights:

Rights	Description
Right to withdraw consent (if applicable)	Where we are using your personal data based on your consent, you can withdraw your consent at any time.
Right to lodge a complaint with a supervisory authority	You have the right to raise a complaint about how we handle your personal information with the Information Commissioner's Office by calling 0303 123 1113 or visiting https://ico.org.uk/make-a-complaint/ .

Exercising your data protection rights

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Children's Privacy

We do not market our products or services to children, and we do not knowingly collect Personal Data of children without parental consent, unless permitted by law. If we learn that a child has provided us with their Personal Data without parental consent, we will securely and permanently delete it, in accordance with applicable law.

If you are a parent or guardian and you are aware that your child has provided us with their Personal Data without your consent, please contact us.

How to contact us

If you would like to exercise or discuss your statutory data protection rights, or if you have any concerns or questions about how we handle personal data, please email dataprotection.jv@hrgo.co.uk or contact us using the details below:

talentED Recruiters Limited
c/o HR GO plc
The Cedars
Church Road
Ashford
Kent
TN23 1RQ

Our telephone number is (0)1233 722400.

Please send your communication clearly indicating 'F.A.O Data Protection Officer' and your message will be passed directly to the DPO for attention.

How To Complain

In the first instance, please contact us so we can resolve your issue informally. This is the quickest way to get your issue resolved.

You also have the right to lodge a complaint with the relevant supervisory authority if you are concerned about the way in which we are handling your Personal Data. The supervisory authority in the UK is the Information Commissioner's Office who can be contacted online at <https://ico.org.uk/make-a-complaint/> or by telephone on 0303 123 1113.

Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time. We will notify of the changes where required by applicable law to do so. Last modified: 1st September 2023.