



# ASSOCIATE PRIVACY POLICY

---

**DATA CONTROLLER: HUNTWOOD CTC LIMITED  
("HUNTWOOD")**

**DATA PROTECTION OFFICER: CAROL HAWKER**

As part of our relationship with you, Huntswood collects and processes personal data. Huntswood is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

## **What is the purpose of this document?**

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

Huntswood is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to prospective, current and former associates, and any substitute sent in accordance with the contract. This notice applies to the individual associate providing services under a contract with Huntswood, whether these services are provided directly or via a limited company.

This notice does not form part of any contract to provide services.

We may update this notice at any time. If this notice is updated, a further copy will be made available to you as an existing associate or can be requested, if you are a former associate.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

This notice describes and explains how we use associates' personal data. It is not related to current, former or prospective customer data. That is addressed separately under Huntswood's external privacy notice.

## What are the data protection principles?

We will comply with data protection laws. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## What information does Huntswood collect?

Huntswood collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- and
- information about your entitlement to work in the UK.

There are "special categories" of more sensitive personal data which require a higher level of protection. We may also collect, store and use the following "special categories" of more sensitive personal information:

- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- Information about your race or ethnicity, religious beliefs, trade union membership, sexual orientation and political opinions

Huntswood may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

Huntswood may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks, this may vary depending on the client's specific needs. Huntswood will seek information from third parties only once an offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, and on other IT systems (including email).

Where we receive information about you from other sources, we will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out below (depending on the types of information we receive).

### **Why does Huntswood process personal data?**

Huntswood needs to process data during the course of our engagement. For example, it needs to process your data in order to pay you in accordance with your contract.

In some cases, Huntswood needs to process data to ensure that it is complying with its legal obligations. For example, if it is required to check a successful applicant's eligibility to work in the UK before entering into a contract with you.

Huntswood has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process, as well as throughout the period of engagement. Processing data from job applicants allows Huntswood to manage the recruitment process, assess and confirm a candidate's suitability for engagement. Huntswood may also need to process data from associates to respond to and defend against legal claims.

Huntswood may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. Huntswood processes such information to carry out its obligations and exercise specific rights in relation to employment.

For some roles, Huntswood is obliged to seek information about criminal convictions and offences. Where Huntswood seeks this information, it does so because it is necessary for it to carry out its obligations in relation to client requirements. In certain circumstances we will be entitled to do this to comply with a legal obligation. In all other circumstances, we will need to ensure that the applicant has provided their consent for Huntswood to process criminal records information about them. In these circumstances, Huntswood will provide a separate consent form so the individual can provide their consent.

### **Where is the data stored?**

Data will be stored in computerised and paper-based systems, including your recruitment file, Finance and other IT systems (including the organisation's email system).

Electronic versions of the information you provide are stored on the Itris system which is stored on Huntswood's servers.

## In what situations will we use your personal information?

Set out below, we have listed the situations in which we use your personal data, and, against each situation, we have listed the purpose for which we use your data (in italics). Where the lawful basis for processing your personal data is pursuant to our legitimate interest, we have set out the basis for this in the Appendix.

- For the purposes of recruitment - *to comply with a contract and where it is in our legitimate interests to do so.*
- To check your eligibility to work in the UK - *to comply with a legal obligation.*
- For the purposes of internal and external communications – *necessary for our legitimate interests.*
- To manage your conduct, performance, capability and personal development and to ensure your compliance with our internal policies and procedures - *necessary for our legitimate interests and to comply with our legal obligations.*
- To make decisions about your engagement including pay and bonuses - *necessary for our legitimate interests.*
- In order to administer your contract and provide and process contractual rights and benefits - *to perform your contract.*
- To deal with any complaints or disputes in which you are involved - *necessary for our legitimate interests.*
- For the purposes of business management and planning, including accounting and auditing - *necessary for our legitimate interests.*
- In order to facilitate payments to you - *to perform our contract with you and to comply with our legal obligations.*
- To transfer to third party service providers - *where it is in our legitimate interests to do so or where it is necessary in order for us to provide you with a benefit or comply with your contract of employment. In some cases we may ask for your consent to the transfer.*

Huntswood will also process sensitive personal data in the following ways, again against each situation we have listed the purpose for which we use your data (in italics).

- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, and to monitor and manage sickness absence—*to comply with our legal obligations.*
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting – *where this is needed in the public interest*

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

## What happens if there is a change of purpose?

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Who has access to data?**

Your information may be shared internally for the purposes of administering the contract. This includes members of the recruitment team and IT staff if access to the data is necessary for the performance of their roles.

Huntswood will, at your request, share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks, where this is appropriate.

We may have to share your data with third parties, including third-party service providers, Huntswood's clients and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

### **Which third party service providers process my personal information?**

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. The following third-party service providers process personal information about you for the following purposes:

- The following organisations are provided with your name, and (in most cases) your address and date of birth for the purposes of undertaking background checks during the recruitment process:
  - CIFAS, Epicor, Equifax, Gorkana, Credit Safe, the Insolvency Register, MRZ Checker, Home Office Biometric Check, and the FCA Register;
- Adobe EchoSign for issuing contractual documentation for signature;
- HubSpot to manage Huntswood's email system;
- Itris for the purpose of storing recruitment files electronically;
- Knight Frank for the purpose of providing car parking facilities; and
- Third party payment providers for the purposes of processing monies owed to you under the contract.;
- Cognito for the purpose of authentication using social media accounts - google, facebook and Amazon to log into the Timesheet Portal and Webform.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for

their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Does Huntswood transfer my data outside of the EEA?**

Most of your data will be stored and processed within the EEA. Occasionally, it may be necessary to transfer your data outside of the EEA. Huntswood currently envisages that it may transfer your data to the US in the following circumstances:

- To Gorkana for the purposes of undertaking background checks; and
- To HubSpot for the purposes of managing our email system.

The transfer of this data will be protected by the inclusion of Standard Contractual Clauses in the agreement between Huntswood and these service providers. Standard Contractual clauses are contractual clauses that have been approved by the European Commission as providing an adequate level of protection for your data

### **Automated decision making**

Huntswood does not use automated decision making in relation to you.

### **What do we do with information about criminal convictions?**

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our legal obligations or where you have provided your explicit consent.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We will only collect information about criminal convictions if it is appropriate given the nature of the role. Information will normally be collected as part of the recruitment process. We will use information about criminal convictions in the following ways:

- To ensure those associates who are in positions of trust or who have access to sensitive or financial information belonging to Huntswood or its clients, do not have criminal convictions; and
- To prevent criminal activity, to protect third parties and to comply with obligations that we owe to third parties or any other legal obligations that we may have.

### **Processing of personal data by Huntswood's clients**

Huntswood will transfer your personal data to its clients for the purpose of putting forward project proposals. If this proposal is accepted, we will provide further personal data for the purpose of contracting with the client. Huntswood has a legitimate interest in providing this information.

Huntswood will not provide any sensitive personal data to its clients unless it is under a legal obligation to do so for the purpose of making reasonable adjustments or in circumstances where we have received your prior explicit consent.

### **How does Huntswood protect data?**

Huntswood takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. Huntswood are ISO27001 (Information Security) accredited, adherence to the Information Security controls is monitored internally throughout the year, and by external annual audit.

Where Huntswood engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us by you; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **For how long does Huntswood keep data?**

If your application is unsuccessful, Huntswood may keep your personal data on file in case there are future opportunities for which you may be suited. Your details will be kept for a period of ten years. When the ten years is due to expire, Huntswood will ask for your consent to keep your data for this purpose for a further ten years. You are entitled to request that your data is deleted at any time, please see below for further details.

If your application is successful, personal data gathered during the recruitment process will be transferred to Huntswood's data base for record keeping requirements and used for the duration of the relationship.

At the end of the relationship, we will continue to hold your data for a period of 10 years. During this time, we may contact you with opportunities which may be of interest to you.

### **When might you share my personal information with other entities in the group?**

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

### **What about other third parties?**



We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

### **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require Huntswood to change incorrect or incomplete data;
- require Huntswood to delete (where possible your data will be deleted, however sometimes Huntswood must maintain some records for legal reasons) or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where Huntswood is relying on its legitimate interests as the legal ground for processing;
- request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it; and
- request the transfer of your personal information to another party.

If you would like to exercise any of these rights, please contact [dpo@huntswood.com](mailto:dpo@huntswood.com)

If you believe that Huntswood has not complied with your data protection rights, you can complain to the Information Commissioner.

### **No fee usually required**

You will not have to pay a fee to access your personal information (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.

### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Huntswood's DPO. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **What if you do not provide personal data?**



You are under no statutory or contractual obligation to provide data to Huntswood during the recruitment process. However, if you do not provide the information, Huntswood may not be able to process your application properly or at all.

### **Automated decision-making**

Decisions relating to our contract will not be based solely on automated decision-making.

### **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

<b>Purpose</b>	<b>Purpose (sub-category)</b>	<b>Category of data</b>	<b>Explanation</b>
To retain on file and to administer your contract	For the purposes of internal and external communications	Assignment information and location  Email addresses  Names  Job title  Job role	To encourage communication and to identify associates and restrict access to buildings
	To manage the performance of the contract and to ensure compliance with policies and procedures	SLA monitoring  Role and responsibilities  Assignment information	To ensure that client expectations and contractual SLA's are met, and to monitor quality and value.
	To deal with any complaints or disputes in which you are involved with Huntswood clients	Site attendance records  Contractual and SLA performance details  Training and development information	To ensure compliance with assignment requirements, good governance and best practice
To transfer to third party providers	To the following providers for the purposes of carrying out background checks: <ul style="list-style-type: none"> <li>• CIFAS, Epicor, Equifax, Gorkana, Credit Safe, Insolvency Register, MRZ Checker, Home Office Biometric</li> </ul>	Name and (in some cases) address and date of birth	In order to assess suitability for proposed assignment.

	Check, and FCA Register.		
	Itris for the purpose of storing recruitment files electronically	All data held on your file	To ensure accurate records of associates are kept in a centralised and secure location.
	Knight Frank for the purposes of providing car parking facilities	Name	Necessary for the purposes of ensuring building security and managing allocation of car parking spaces.
	Adobe EchoSign for administering signatures	Email address and copies of contractual documentation	For the purpose of securely issuing contractual documentation for signature.
	HubSpot for the purpose of managing the Huntswood email system	Name and email address	Necessary to provide a cost effective and efficient hosted email server.
	Cognito for the purpose of authentication using social media accounts - google, facebook and Amazon to log into the Timesheet Portal and Webform	Log in details - No password data is stored by Huntswood	For the purpose of using the Timesheet Portal