



Data Protection Policy

Introduction

We recognise our responsibility to treat your personal information with care and to comply with all relevant legislation, in particular the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR) – the “legislation”. This notice covers our requirement to provide you with information on how and why we use your personal data and of your rights under the legislation.

Data Protection

The Company is an employer which provides commercial services to its clients. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

1. Collection and use of personal data

i. Purpose of processing and 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 work-finding services. The legal bases we rely upon to offer these services to you are:

- Consent
- Legitimate interest
- Legal obligation
- Contractual obligation



ii. Legitimate interest/legal obligations

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

- For the purposes of confirming identity to clients of individuals providing services on our behalf for health and safety and regulations.
- Compliance with tax laws in respect of employer obligations and payroll.
- Compliance with employment law in respect of employer obligations.
- Compliance with immigration laws.

iii. Recipient/s of data

The Company will process your personal data and/or sensitive personal data with the following recipients:

- The 'Client' – Company providing work placements
- HMRC
- Home office
- Any other body or organisation as required to facilitate work placement
- Our pensions provider
- Any other Government Dept with the authority to receive such data as empowered by UK law.
- Select third parties only where specifically relevant (Constant Contact, CashPlus, Kingsbridge)

iv. Statutory/contractual requirement

Your personal data is required by law and/or a contractual requirement (e.g. our client may require this personal data), and/or a requirement necessary to enter into a contract. We are required to provide details of your name and qualifications to our clients for health and safety and security purposes and failure on us to provide such information may result in you being refused access to site.

Your personal data is required by law by us as an employer and we are required to hold payroll information for a period of 6 years to ensure compliance with tax legislation and HMRC. This information includes your name, national insurance number and pay details.



Additional personal data is required by us as an employer to ensure your right to work in the UK and that you are receiving your employee entitlement. Such information includes copies of your passport, official documents confirming address and right to work, sick pay records, holiday pay and pensions information.

If you have not opted out, Your personal data is required by us to be provided to our pensions provider in order to ensure you are receiving the correct pensions contributions.

2. Data retention

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 must also keep payroll records of any directly employed PAYE workers, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

Where the Company has obtained your consent to process your personal data (specifically; full name, address, date of birth, phone number, email, NI number, professional qualifications, right to work information), we will do so in line with our retention policy (a copy of which is available on request). Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal data.

3. Your rights

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

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- 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;
- 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 personal data you have the right to withdraw that consent at any time by contacting.

4. Complaints or Queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact our head office by email.

The data controller for our practice is Ian Richardson, he can be contacted by email or post. If you have any concerns about data protection, in relation to this engagement, please contact our data controller. Email address is dataprotection@numbermill.co.uk our postal address is below.

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.