

# Macon Resources Ltd

*Labour Supply Specialists*

## Macon Resources Ltd Private Policy

### Information we hold

We collect names, contact details and other relevant information directly from your CV. We may also obtain data about candidates from third parties to enhance and personalise the experience and make sure we're finding the jobs most suitable to the individual. When we receive the individual's details and CV electronically, this may be through a direct application on one of our website or an application that has been made through a third-party job board.

We will likely obtain further personal information about individuals during the relationship. This may be obtained from the individuals directly or from third parties such as organisations to whom we have provided the individuals CV and who have engaged with you as part of a job application.

### How we use individual's Personal Information

We hold use and disclose personal data for legitimate business purposes including:

- To provide services to individuals
- To maintain our business relationship, whether you are using our website, a client or a candidate
- To enable individuals to submit CV's for job applications, to apply for specific jobs
- To match details of individuals with job vacancies to assist in finding the correct position most suitable and to send personal information (including sensitive personal information) to clients to apply for the jobs
- To retain individual details and to notify about future jobs opportunities other than the specific role for which the individual was in contact with us for
- To answer any queries there may be
- To fulfil contractual obligations with our clients
- To provide further services available by sharing individual's information with other companies with our Group of trusted companies and trusted third parties.
- To release personal information to regulatory or law enforcement agencies if required or permitted to do so

We may process, in accordance with local regulations, certain sensitive personal data (special category) where individuals include it in the information that is submitted to us, for example information about health, religion, ethnic origin or health that is in the individual CV sent to us.

### Who we share Individual Personal Information with

In some situations, we will share individual's personal information with other parties. Details of these parties are shown below.

We will share individual personal information with other companies for the following purposes:

- To provide the recruitment services
- Business development
- For systems development and testing
- To develop and market our services

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- To improve customer service and make our service of most value to you
- To tailor our website and or the websites of our companies to make them relevant to the individual

### Clients

We disclose individual personal information to clients who have vacancies for jobs which individuals are interested.

### Trusted Third Parties

We will share individual personal information where necessary, individual sensitive personal information with trusted third parties where we have retained the to provide services that individuals or our clients requested, such as:

- Employment reference checking
- Qualification checking
- Criminal reference checking (if required)
- Verification of details you have provided from third party sources; and/or
- Psychometric evaluation or skills tests

We will also share your personal information with the third parties who perform functions on our behalf and provide services to us such as:

- Professional advisors
- Data analytical providers
- IT consultants carry out testing and development work on our business technology systems
- Research and mailing houses
- Function co-ordinators

We require minimum standards of confidentiality and data protection from such third parties. To the extent that any personal information is provided to third parties.

### Regulatory and Law Enforcement Agencies

As noted previously if we receive a request from a regulatory body or law enforcement agency and if permitted under GDPR laws, we may disclose certain information to such bodies or agencies.

### New Business Owners

If we or our business merges with or is acquired by another business or company, we will share the individual's personal information with new owners of business or company and their advisors. In such case of this event the individual will be sent notice informing.

How long will we keep individual's personal data for?

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We will store individual's personal data only for as long as necessary. Further we conduct regular data-cleansing and updating exercises to make sure the information we have is relevant and accurate. The length of time we will hold personal information for will depend on the service we perform for you and for how long you require it. We support candidates with assignments which can be over many years and potentially throughout their career. The purpose of retaining candidate data is an ongoing purpose that is constantly updated and added to.

Our standard terms of business state that our clients should retain candidate data such as CVs and personal information for the purposes of the specific role applied or, as the controllers of the data they should inform the individual if they plan on retaining it on file to notify for any future roles or any other purposes.

### The individual's rights on Information we hold

Individuals have certain rights in relation to personal information we hold about them. We will require evidence on you identify before we are able to act on your request. Details of these rights and how they are exercised are below.

#### Right to object:

- This right enables individuals to object us processing personal data where we do so for one of the following four reasons: (a) our legitimate interests; (b) to enable to perform a task in the public interest or exercise official authority; (c) to send direct marketing materials; an (d) for scientific, historical, research or statistical purposes.
- The "legitimate interests" and "direct marketing" categories above are the ones mostly likely to apply to our candidates, website users, clients or suppliers. If the individual objection relates to us processing the data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing activity in question unless:
  - We can show that we have compelling legitimate grounds for processing which overrides individuals interests; or
  - We are processing the data for the establishment, exercise or defence of a legal claim.
- If an objection relates to direct marketing, we will act on the objection by ceasing this activity

#### Right to withdraw consent:

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

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### Data Subject Access Requests (DSAR):

- Individuals may ask us to confirm what information we hold at any time and can request us to modify, update or delete such information. We may ask individuals to verify their identity and for more information about the request. If we provide access to the information we hold about the individuals we will not charge them for this information unless the requests are “manifestly unfounded or excessive”. For further copies of this information from us, we may have to charge a reasonable administrative cost where legally permissible. Where we are legally permitted to so, we may refuse the request. If we refuse the request, we will always explain the reasons in doing so.
- Please note that in certain jurisdictions in which we operate, we comply with additional local law requirements regarding data subject access requests and may refuse your request in accordance with such laws.

### Right to Erasure:

- Individuals have the right to request that we erase the personal data in certain circumstances. Normally, the information must meet one of the following criteria:
  - The data is no longer necessary for the purpose for which we originally collected and/or processed them
  - Where previously given, individuals have withdrawn their consent to us processing that data and there is no other valid reason for us to continue processing
  - 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 demonstrate overriding legitimate grounds for processing.
- Please note that in certain jurisdictions in which we operate, we comply with additional local law requirements regarding data subject right to erasure and may refuse the request in accordance with local laws.
- 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 public interest
  - For archival, research or statistical purposes or
  - To exercise or defend a legal claim
- When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data

### Right to Restrict Processing

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In certain circumstances, individuals have the right to object to our processing of personal information by contacting us using any methods in the Contact Section below. For example, if we are processing information based on our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests. The individual also has the right to object to use individual information for direct marketing purposes.

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

- Where the individual disputes the accuracy of the personal data that we are processing. In this case, our processing of the personal data will be restricted for the period during which the accuracy of the data is verified.
- Where the individual objects to our processing of the personal data for our legitimate interests. Here the individual can request that the data be restricted while we verify our grounds for processing personal data
- Where our processing of the data is unlawful, but the individual would prefer us to restrict processing of it rather than erasing it
- Where we have no further needs to process the individual's personal data, but they require the data to establish, exercise or defend legal claims

If we have shared the individual's personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify before lifting any restriction on processing the individual's personal data.

### Right of Data Portability

In certain instances, the individual has a right to receive any personal information that we hold on them in a structured, commonly used and machine-readable format.

We can be requested to transmit that information to the individual or directly to a third-party organisation.

The above right exists only in respect of personal information that:

- The individual has provided to us previously
- Is processed by us using automated means

While we are happy for such requested to be made, we are not able to guarantee technical compatibility with a third-party organisation system. We are also unable to comply with requests that relate to personal information of others without their consent.

Individuals can exercise any of the above rights by contacting us using any of the methods in the Contact section below.

Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

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Right to lodge a complaint with a supervisory authority

The individual has the right to lodge a complaint with their local supervisory authority.

- If the individuals would like to exercise any of these rights or withdraw their consent to the processing of their personal data (where consent is our legal basis for processing the personal data), details of how to contact us can be found below. Please note we may keep a record of communications to help us resolve any issues which are raised.
- It is important that the personal information we hold is accurate and current. Please keep us informed if any information changes during the period or which we would hold the individuals data.

### The legal Basis for Processing individuals Personal Information

Under GDPR, the main grounds that we rely upon to process personal information of clients and candidates are the following:

1. Necessary for entering into, or performing, a contract - to perform obligations that we undertake in providing a service to the individual or to take steps at the request of the individual to enter into a contract with us, it will be necessary for us to process the personal data.
2. Necessary for compliance with legal obligation – We are subject to certain legal requirements which may require us to process your personal data. We may also be obliged by law to disclose the individual's personal data to a regulatory body or law enforcement agency
3. Necessary for legitimate interests – either we or a third party, will need to process the individual's personal data for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by the individual's rights and freedoms, including the right to have the personal data protected. Our legitimate interests include responding to requests and enquires from you or a third party, optimising our website and customer experience, informing individuals about our products and services and ensuring that our operations are conducted in an appropriate and efficient manner.
4. Consent – in some circumstances, we may ask the individual's consent to process the personal data.

### How do we safeguard individual Personal Data?

- We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach. If the individual suspects any misuse or loss of or unauthorised access to their personal information, please do let us know immediately.

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## Changes to our Privacy Policy

This privacy policy can be changed at any time by Macon Resources Ltd. If we change our privacy policy in the future we will advise the individual of material changes or updates to our privacy policy by email, where the individual has provided us with the email address.

## Contact

If the individual has any enquiries or if they would like to contact us about our processing of the individual personal information, including to exercise the individual's rights as outlined above, please contact us either by email or letter to the following address:

Email: [Info@maconresources.co.uk](mailto:Info@maconresources.co.uk)

Post: Macon Resources Ltd  
9-10 St Andrews Square  
Edinburgh  
EH2 2AF