



ENGINEERING RECRUITMENT

PRIVACY POLICY

NLBR Limited is a recruitment business which provides work seeking services to clients and candidates. In order to provide these services, we must process personal data which includes sensitive personal data and in doing so, we act as a data controller.

The entities covered by this agreement are:

NLBR Ltd

You may provide your personal details to us directly, such as on a job application, registration form, via our website, or we may collect your details from another source such as a job board or LinkedIn. We must have a legal basis for processing your personal data. For the purposes of providing you with work seeking services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms included within the following.

Legal basis for processing your data

Legitimate Interests

NLBR Ltd believe that we have a legitimate interest in processing your data for the purposes of providing work seeking services to both our clients and candidates. We endeavour to build long-term working relationships with clients and candidates, subsequently providing a personalised service and we believe it is in everybody's interests for us to process your personal data.

Candidates

- We believe that if you have posted your CV onto a job board or networking site (such as LinkedIn), it is reasonable to expect that you are happy for us to collect and use your data to offer or provide you with work seeking services. This can include forwarding your details to prospective employers with prior consent or matching your details against our open vacancies. In the case of forwarding your details to prospective employers they may want to verify certain aspects such as references and qualifications. We need to be able to do this to function as a profit-making organisation.
- We must comply with various legal, regulatory and tax obligations and we have a legitimate business interest in doing so. Subsequently we may, on

occasion, share your data with the appropriate authorities to meet these obligations.

- To ensure we can provide services to you we will need to use your data for internal processes such as payroll or invoicing.
- We want to introduce people to suitable job opportunities and help people find jobs. As a result, we believe that contacting you to discuss job opportunities is reasonable, although you will never be subject to mail merging activities as we pride ourselves on working in a more professional and personalised manner.

We will process your data to send you appropriate content.

Clients

So that we can provide you and your organisation with the best possible service, we will store details of the organisation and its contacts. We will also store notes of conversations, emails, meetings and previous recruitment activity. We consider this to be within our legitimate interest in providing recruitment services to you.

Consent

In particular cases, such as processing sensitive data, we will need to obtain your consent. In these cases:

- You have to give your consent freely
- You have to know what you are consenting to
- You should be able to control your consent
- We will keep a record of your consent
- You have the right to withdraw your consent

Establishing, exercising or defending legal claims

On occasion, we may need to process your data when it is necessary for our organisation if we are exercising or defending a legal claim, or whenever the courts are acting in their judicial capacity.

Collection of personal data

Candidates

As a result of providing you with work seeking services we may collect some or all of the following types of personal data. We do this to enable us to provide the best possible service so that we can help you to find your next job or keep you updated with suitable opportunities. As part of GDPR requirements we will maintain records of our data processing activities. We will document the type of personal data we've collected, it's origin and who it's been shared with. The following list is not exhaustive and is in addition to any data that we are required by law to process:

- Name
- Contact details
- Sex/gender
- Date of birth
- Education
- Employment history
- Immigration status
- Nationality
- Copy of passport / ID card / other form of identification
- Tax information such as social security numbers
- Details of criminal convictions where applicable to the role
- Current salary and package
- Any further information that you tell us included in future employment preferences
- Dates that you make contact with our organisation

Clients

To ensure that the relationship between our organisations runs as smoothly as possible, we will collect data. This will usually be restricted to name, telephone number/s and email address of individual contacts.

How we collect your personal data

Candidates

We collect personal data from you via the following methods:

1 Personal data that you give us

In order to provide work seeking services, we need to know certain information about you. This enables us to make better matches and to identify the most appropriate job opportunities for you. The ways in which you can provide us with this information includes:

- Registering on our website
- Sending us a copy of your CV electronically or by post
- Applying for a role via a job board

2 Personal data that we receive from third parties

We may receive personal data about you from third parties and these can include:

- Our clients may share information about you
- Your referees may share information about you

- We may obtain data about you from websites such as job boards and LinkedIn
- Through social media channels

Clients

We collect personal data from you via the following methods:

1 Personal data that you give to us

In order to send you the most appropriate candidates and help us provide the best service to you, we receive data as follows:

- You contact us by phone or email
- We contact you by phone or email, either during the normal course of business or as a result of our business development efforts

2 Personal data we receive from other sources

We may seek and obtain additional information about you as part of our business development and due diligence processes.

- From offline and online media
- Delegate lists from meetings, events and conferences

How we use your personal data

Candidates

The purposes in which we use your data are as follows:

1 Work Seeking Services

NLBR Ltd provide work seeking services to candidates. We endeavour to connect you with relevant opportunities as and when they arise. As a result, we may use your data in the following ways if we deem it necessary to do so for our legitimate interests. The ways in which we might use and process your data are as follows, although this list is not exhaustive:

- With your consent we will submit your data to prospective employers to apply for jobs
- Assessing your data against open vacancies to determine your suitability
- To provide you with work seeking services

- Storing your details on our database so that we can contact you in relation to future vacancies
- Storing your details on our database so that we can contact you in order to build long-term relationships through regular contact
- To provide you with job alerts and other work seeking related communications
- To enable us to meet our obligations of any contracts between you and us
- To enable us to meet our obligations of any contracts between us and third parties with regard to your recruitment
- Facilitating of payroll and invoicing processes
- Verifying details that you have provided (e.g. references, qualifications and criminal convictions)
- Complying with our legal obligations

2 Marketing Activities

If you have contacted us previously such as registering on our website, submitting a CV, applying for a job or contacting us via email or through a networking site such as LinkedIn, we may send you recruitment related services as we believe that this will be beneficial to you, particularly if you are actively looking for a new job and we provide details of vacancies which are similar to the criteria you've provided to us. On occasion, we may also ask that you participate in salary surveys and job related questionnaires to provide us with data which will enable us to advise you better in your job search. For other marketing we will need your consent.

If you do not wish to receive any marketing communications from us, you can withdraw your consent by emailing us at nathan@nlbreruitment.co.uk

3 Sensitive Personal Data

On occasion, we may need to collect sensitive personal data such as medical information and criminal convictions if we are required to do so for a specific role. We will only do this with your explicit consent and you may withdraw your consent at any time.

4 To help establish, exercise or defend a legal claim

In order to establish, exercise or defend a legal claim we may need to process your data.

Clients

We use your data for the following purposes:

1 Recruitment Services

As an organisation, our primary function is to provide you with recruitment services including presenting you with candidates, providing market intelligence (eg. salary surveys) and the provision of recruitment process outsourcing services. So that we are able to provide these services, we will process your data in the following ways:

- Storing your data on our database so that we can contact you in relation to recruitment activities
- Recording notes of conversations and meetings
- For targeted marketing campaigns
- Customer satisfaction surveys

2 Marketing Activities

As a matter of course we shall not seek your consent when sending marketing materials such as our salary surveys to corporate email addresses. If you wish to opt out of receiving marketing information you can email us at nathan@nlbreruitment.co.uk

3 To help establish, exercise or defend a legal claim

Occasionally we may need to use your data to establish, exercise or defend a legal claim.

Who we share your personal data with

During the course of conducting our daily business, we share your data with a variety of other parties in a number of ways, for various reasons.

They are as follows:

Candidates

- Our clients and other recruitment businesses in the performance of finding suitable employment for you
- Third party IT companies with whom we are contracted to and have appropriate data processing agreements

- Third party services providers who perform work on our behalf (e.g. auditors, lawyers, IT providers etc.)
- Tax and local authorities to enable us to comply with laws and regulations
- Job boards and job aggregators, where it helps us find you work
- Managed Service Providers where our clients have outsourced their recruitment process

Clients

- Third party IT companies with whom we are contracted to and have appropriate processing agreements
- Third party services providers who perform work on our behalf (e.g. auditors, lawyers, IT providers etc.)
- Tax and local authorities to enable us to comply with laws and regulations

How we safeguard your personal data

We take safeguarding your personal data seriously and it is as important to us as an organisation, as it is to you. To ensure that your data is safe and protected from misuse, loss or unauthorised access we have implemented a number of technical safeguards and operational processes. We also have processes in place if we are required to deal with any suspected data breach.

If at any stage you suspect that your data has been misused, or has been compromised please contact us immediately at nathan@nlbreruitment.co.uk and it will be recorded in our risk register.

Retention Policy

NLBR Ltd will not retain your data longer than we need it. In some cases we are required to hold your data to comply with tax, legal or regulatory issues. Subject to this, we will delete your data if we haven't had any relevant contact from you (or for clients, the company you work for or with) for a three year period.

If you supply your services via a third party, then the relevant contact shall be with that third party. If that third party informs us that they no longer have a relationship with you, we will hold your data for a period of three years from that point forward.

In the context of this policy, relevant contact means the following:

- Communicating with us via email, telephone or mail (be it email or via a networking site such as LinkedIn)
- Submitting your CV or applying for a role
- Registering and logging onto our websites
- Completing any surveys

- Clicking through from any of our marketing communications

Your rights

You are entitled to the following data protection rights:

- The right to be informed about the personal data that we process on you;
- The right of access to the personal data that we process 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
- The right to withdraw consent at any time.

Where you have consented to us processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by contacting us at nathan@nlbreruitment.co.uk

We will remove all personal data from our systems with the exception of data which we need to retain for legal, regulatory and tax obligations. We will notify you once your data has been removed via email.

Overseas Transfers

As an organisation, we operate on an international scale and are therefore an international business. We provide work seeking services to candidates and clients around the world and therefore, in order for us to give you the best service possible we will sometimes need to transfer your data internationally.

This could be:

- To overseas clients
- Our clients may transfer your data internally
- To data storage facilities
- To our suppliers where appropriate

We only transfer the information you provide to us to countries outside the European Economic Area in order to provide you with work seeking services. As an organisation we will take steps to ensure sufficient protections are in place to ensure the security of your information to the best of our abilities. The European Economic Area includes the EU member states, as well as Norway, Iceland and Liechtenstein.

Complaints or queries

Please contact us at nathan@nlbreruitment.co.uk if you wish to complain about this privacy notice or any of the procedures set out within it.

You also have the right to raise concerns with the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>,
If your personal data shall be processed outside of the UK, you have the right to contact any other relevant supervisory authority if you believe that your data protections rights have not been adhered to.

Our contact details

By post:

Partnership House,
84 Lodge Road,
Southampton,
Hampshire,
SO14 6RG

By email:

nathan@nlbreruitment.co.uk

If you have any questions or queries regarding this notice, please don't hesitate to get in touch.