

# 0.3

## Contractors

We collect and process your personal data in order to find you a suitable role as well as details of placements offered.

Where you undertake work as a Contractor we also process additional information as required for the performance of contracts as well as our legal obligations with HMRC.

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## What information do we collect?

We may collect any of the following:

1. Full name
2. Contact information including address, phone number and email
3. Work history and education/qualifications (CV)
4. Job preferences including role; industry; geographical areas and salary
5. A log of our communications with you by email and telephone
6. Any other information that is held within your CV that is relevant to our purpose.
7. Full details of placements
8. References, where applicable
9. Outcome of criminal record checks and security clearances, where applicable
10. Passport, work permits and Visas
11. Date of Birth
12. National Insurance Number
13. IP Address (during the contract signing process)

Where you work under your own Limited Company we will also collect:

1. Limited Company name and number and proof of registration
2. VAT Number and proof of registration
3. Details of Public Liability Insurance
4. Company Bank Detail

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## How do we collect your information?

We may collect your data directly from you when you apply to one of our job adverts or if you send us a CV directly. We will provide a link to this Privacy Policy on any job adverts we place and in response to receiving your CV.

We use a variety of methods to source the right caliber of candidate such as LinkedIn and job boards/cv libraries.

When we collect your data in this way we will inform you that we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your data. We will do this within one month from the date of collection.

Once you have accepted a placement we will collect further personal data as detailed above. This may come directly from you or your agent/representative i.e. your accountant.

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## How do we use your information?

We use your information:

1. to match your skill set and experience with job vacancies in order to find the position that most closely matches your requirements;
2. to share your data with our clients for consideration for their vacancies (we always ask for your permission before we do this);
3. in order to make a successful placement with our Clients;
4. to keep you informed of appropriate opportunities as they arise and to keep in touch with you as your career progresses;
5. to establish that you have the Right to Work in the UK;
6. to undertake relevant security and criminal record checks as required by our clients and as permitted by law;
7. to put in place contractual arrangements and documentation once a placement has been accepted;
8. to set you up on our timesheet system to enable you to submit timesheets and expenses;
9. to pay you;
10. to comply with any legal and regulatory requirement.

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## Our basis for processing your data

As a recruitment consultancy we introduce Candidates to Clients for permanent employment or contractor opportunities. The exchange of personal data of our Candidates and Client contacts is a fundamental and essential part of this process.

In order to support our Candidates' career aspirations and our Clients' resourcing needs we require a database of Candidate and Client personal data containing historical information as well as current resourcing requirements.

What makes us unique is our candidate community, our ability to build and maintain relationships while offering career advice, information and inspiration around relevant fields of interest.

This is our legitimate interest for processing your data.

We may also rely on the following bases, depending on our relationship status:

- **Consent** – we always obtain your consent before sharing your data with our Clients, which you can opt out of at any time however should your application be in process this would mean withdrawing you from consideration.
- **Contract** – if we have a contractual relationship through placing you as a contractor within our Clients' business this will change our basis for processing your data.
- **Legal Obligation** – if you are placed in a contract role we will have certain legal obligations, for example with HMRC which will impact our basis for processing your data.

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## Who we share your data with

In order to provide you with our services and meet our compliance obligations, both contractually and legally we will need to share your data with certain third parties who process your data on our behalf.

1. 1. Various third party providers including: our candidate management platform, email provider, cloud storage provider, email security provider and client recruitment platforms;
  - a. When you accept a Contract placement with us this list will expand to include our timesheet system, our accountant, financial and banking systems;
2. Prospective employers or engagers;
3. Other recruitment companies or intermediaries involved in managing the supply of personnel;
4. A professional association or registration body or regulatory or law enforcement agencies if Saragossa is required by law to do so.
  - a. For example, upon accepting and performing against a Contractor contract we are obliged to inform HMRC of certain personal data on a quarterly basis via HMRC Intermediary Reporting.

There will be occasions where your personal data is shared with third parties operating outside the EU and EEA.

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 outside the EEA, or who will access the information from outside the

EEA, we will ensure that approved safeguards are in place, such as the approved Model Clauses or the EU/US Privacy Shield.

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## How long do we keep your information for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirement.

We maintain detailed policies and procedures regarding how and for how long we retain your personal data.

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## What are your rights?

You have certain, specific rights with respect to how we process your data. Saragossa is committed to ensuring that your rights are protected.

You may exercise your rights below by contacting us using the details at the end of this Privacy Policy.

The GDPR sets out the following rights applicable to data subjects:

1. **The Right to be Informed.** We have provided this Privacy Policy to provide you with concise, transparent, intelligible and easily accessible information about how we use your personal data.
2. **The Right of Access.** You may request access to a copy of your personal data by contacting us on the details below.
3. **The Right to Rectification.** You may ask us to rectify inaccurate information held about you. We will also get in touch with you periodically to ensure that we hold the correct details and most up to date version of your information i.e. your CV.
4. **The Right to Erasure.** You may ask us to delete your personal data. We may not be able to erase your personal data if there is an overriding contract/legal basis for retaining it, but we will let you know this reason in response to your request. Please note that in the event you wish to exercise these rights, we may be unable to process any applications (including those in-flight).
5. **The Right to Restrict Processing.** You may ask us to restrict the processing of your personal data, and we will comply when one of the following applies
  - a. you are contesting the accuracy of your personal data that we hold, while we verify the accuracy of your personal data;
  - b. the way we are processing the personal data is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
  - c. we no longer need the personal data for the purposes of the processing, but you need the personal data to establish, exercise or defend legal claims; or



- d. you have objected to processing in the public interest or in relation to our legitimate interest, pending the verification whether any legitimate grounds we may have override your right.

While you have restricted its processing, we will only store your personal data in question, and may process it only with your consent or to establish, exercise or defend legal claims or protect the rights of another natural or legal person or for reasons of important public interest. We will notify you before lifting the processing restriction.

- 6. **The Right to Data Portability.** You may ask us to provide you with the personal information that we hold about you in a structured, commonly used, machine-readable format, or ask us to send such information to another data controller, where:
  - a. the processing is based on consent or on a contract; and
  - b. the processing is carried out by automated means.

Where technically feasible, we will transmit your personal data directly to the other controller.

- 7. **The Right to Object.** You have the absolute right to object to the processing of your data in relation to direct marketing. You can also object to Saragossa processing your data in connection with our legitimate purpose.
- 8. **Rights with respect to Automated Decision-Making and Profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling. At present all of our decisions involve human decision-making.

9. **Right to lodge a complaint with your data protection supervisory authority.** In the event you believe that we are processing your personal data otherwise than in accordance with the provisions of the GDPR, you have the right to lodge a complaint with the data protection supervisory authority located in the EU jurisdiction where you reside. For the UK, the supervisory authority is the UK Information Commissioner's Office [ico.org.uk](https://ico.org.uk)

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## Children's Privacy

Saragossa does not knowingly collect information from children under the age of 16 and Saragossa does not target its Website or any of its services to children under the age of 16.

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## Security and Data Storage

At Saragossa we are committed to protecting the information you provide to us. To prevent unauthorised access or disclosure, to maintain data accuracy, and to ensure the appropriate use of the information, Saragossa has in place appropriate technological and operational procedures to safeguard the information we collect.

If you believe Saragossa has handled your personal data in a manner that does not comply with this Privacy Policy, please contact us using the details below.

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## Changes to this Privacy Policy

If there are updates to this Privacy Policy, we will post those changes and update the revision date in this document, so you will always know what information we collect, how we use it, and what choices you have. For material changes to this Privacy Policy, Saragossa will actively notify affected individuals.


*This policy was last amended on 23 May 2018.*


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## How you can contact us

If you have any comments or questions about our Privacy Policy or our use of your personal data or you wish to exercise any of your rights under this Privacy Policy please contact our Data Protection Officer:

 [dpo@saragossa.co.uk](mailto:dpo@saragossa.co.uk)

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