

Candidate Privacy Notice:

Introduction

This Privacy Policy sets out the foundation on which all personal data that CPL Specialist Talent Ltd trading as CPL Specialist Talent collect from you, or that you provide to us (via several sources such as our own website, any other group affiliate websites, job boards, direct emails, and events) will be processed by us.

Read this policy carefully to understand CPL Specialist Talent 's practices relating to your personal data and how we will treat it.

If you do not accept that we process your data in the manner detailed in this Policy, please do not submit any personal data to us or please contact us to have your data removed (see contact details below)

The Controller of your Data

CPL Specialist Talent is registered with the UK Information Commissioners Office and is a subsidiary of CPL Resources Plc.

The Cpl Group is registered as a data controller in the Republic of Ireland for the purposes of the General Data Protection Regulation (EU) 2016/679 of the European Parliament on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data. The Cpl Group will deal with the office of the Data Protection Commissioner in Ireland as the Lead Supervisory Authority for regulating all data protection matters within the Group. At CPL Specialist Talent and the Cpl Group, we promise that all the data you send to us is processed fairly and lawfully, and with due skill and care. We will also commit to you that the data you submit is solely used in accordance with the purposes as set out in this policy.

Collection and Use of your Personal Information

CPL Specialist Talent collects and uses your personal information to perform the recruitment functions/services you have requested. We will collect Personal Data. Personal Data will generally consist of your name, contact details and other information contained in your CV. CPL Specialist Talent will confirm your consent for us to hold your personal information before it is stored and processed.

The Personal Data that we collect and process will vary depending on whether you are a CPL Specialist Talent Candidate, CPL Specialist Talent Employee, Third Party Supplier Candidate or Client Contact. Each of these is outlined below.

(i) CPL Specialist Talent Candidate

The Personal Data will be requested, stored, processed, used and disclosed by CPL Specialist Talent to:

- Evaluate data about you against vacancies which we may have that we determine may be suitable for you. In line with the nature of recruitment services, we will keep your data on our database with your consent.
- Send your information to our clients to put you forward as a candidate for vacancies or to assess your eligibility for vacancies that we may have with your permission. When your information is sent to a client, we will notify you when this has been done, to which client it has been shared and for what specific purpose so that you know where else your data has been submitted and stored.
- Permit you to submit your CV to apply online for jobs.
- Communicate with you about relevant job opportunities and provide career guidance and support.
- Where we have a bona fide requirement by law to disclose it to third parties in relation to the detection of crime, the collection of taxes or duties, in order to comply with any applicable law and court orders.
- Third-parties where we or our client have engaged them to deliver services that have been requested. These may include references, qualifications, criminal reference checking services and/or psychometric evaluation or skill tests. These will be advised to you as part of the process and you have the option to decline.

(ii) CPL Specialist Talent Employee

For people being employed and contracted by CPL Specialist Talent, additional Personal Data to Candidate Data is also required to facilitate employment, compliance and payment services, such as bank account details, national identification numbers, tax clearance and visa details. This data will only be held for as long as it is required to provide such employment services and will be deleted once your employment has finished and data is not required for any other legal purposes.

(iii) CPL Specialist Talent Contractor

For people being contracted by CPL Specialist Talent, additional Personal Data to Candidate Data is also required to facilitate employment, compliance and payment services, such as bank account details, national identification numbers, tax clearance and visa details. This data will only be held for as long as it is required to provide such employment services and will be deleted once your employment has finished and data is not required for any other legal purposes.

(iv) Third Party Supplier Candidate

In the fulfilment of some of our Client service contracts, we act as a Master Supplier for recruitment services which requires us to process candidate CVs and worker details from other recruitment providers on behalf of our client. In this case the data processed is specifically for this client's application/ placement and is not available or used for the purpose in section (i) of finding career opportunities for CPL Specialist Talent Candidates. If such a third-party candidate is unsuccessful with their application, then the candidate details are removed from the system. Similarly, once the placement is completed, this personal data is removed from our systems

(v) Client Contact

To enable CPL Specialist Talent to provide recruitment services to your employer, we will process and store client contacts details, which would include name, work contact details, job title and job activity history. Once added to our contact database, you will receive notification of this and you will at all times have the ability to be deleted and/or to opt out from electronic communication

This Personal Data list is not exhaustive and we may seek to process, use or disclose your information for any other purpose which has not been listed above always with your explicit consent.

Who do we share your personal data with?

We may share your personal data to a third party in the event of a sale, merger, liquidation, receivership or transfer of all the assets of our company in circumstances where the third party agrees to observe the terms of this Privacy Policy. When this is done, CPL Specialist Talent will notify you of such circumstances and we adhere to the following principles:

- The transfer is based on a legal obligation, the performance of a contract, or explicit consent.
- Where data is transferred to another party, we ensure appropriate technical and organisational safeguards are used to protect your personal data.
- Where we engage a third party to provide a service to us, we ensure the provider has taken appropriate technical and organisational measures to process, store, and safeguard your personal data.

International Data Transfer:

The information that you have provided to us may be made available to personnel working in CPL Specialist Talent, our affiliate companies, our clients, and the third parties as set out above. Your personal data is stored and processed by CPL Specialist Talent in United Kingdom and it is shared with a service provider based outside the European Economic Area (EEA) to deliver administration services. CPL Specialist Talent assures an adequate level of data protection through the implementation of the appropriate standard contractual clauses between CPL Specialist Talent and the provider based outside of the EEA.

We may share your personal data with organisations (our clients) who are looking to recruit an individual for a role you have expressed an interest in. In some cases, these organisations may store your data in a location outside the European Economic Area. In such specific cases, we will take the appropriate steps to guarantee that your privacy rights continue to be protected through data transfer agreements which incorporate the appropriate standard contractual clauses (SCCs) adopted by the European Commission for the transfer of personal data in the EEA to data controllers and processors in jurisdictions without adequate data protection laws”.

How long do we retain your personal data?

Annually CPL Specialist Talent will write to all Candidates to remind them we are holding their personal data, provide a copy of our most up to date privacy notice and advise Candidates how they can be removed from our database.

If we do not have a specific request to withdraw consent, once a year we will review our Recruitment database and identify candidates where we have not provided any work finding services within the last 3 years and then delete these candidates' personal information from our database.

If we do not have a specific request to withdraw consent, once a year we will review our Recruitment database and identify candidates where we have not provided any work finding services within the last 2 years and then delete these candidates' sensitive data from our compliance database.

Data breaches and how to make a notification

We take appropriate technical and organisational steps to safeguard your personal data and will notify the Data Protection Commission of data breaches where a risk is identified, not later than 72 hours from awareness.

When the personal data breach is likely to result in a high risk to your rights and freedoms, Cpl will communicate to you in clear and plain language the personal data breach without undue delay.

What are your rights?

Unless any restrictions apply, you have the following rights in relation to your personal data to exercise:

- Right of confirmation

You have the right to obtain from Cpl the confirmation as to whether or not personal data which concerns you is being processed.

- Right of access

You have the right to obtain from Cpl information about your personal data processes at any time and a copy of such information.

- Right to rectification

You have the right to obtain from Cpl the rectification of inaccurate personal data held on you.

- Right to erasure (Right to be forgotten)

You have the right to request from Cpl the erasure of personal data held on you.

- Right of restriction of processing

You have the right to request from Cpl restriction of processing of personal data held on you. The accuracy of the personal data is contested by the stakeholder, for a period enabling the controller to verify the accuracy of the personal data.

- Right to data portability

You have the right to receive the personal data held on you, which was provided to Cpl, in a structured, commonly used and machine-readable format.

- Right to object

You have the right to object, on grounds relating to your particular situation, at any time, to processing of personal data held on you.

- Right to withdraw the consent

You have the right to withdraw the consent at any time in some 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

You may execute any of the above rights by contacting us by email to GDPR@righealthcare.co.uk.

Security of your Personal Information

We are committed to the protection of Personal Information submitted to us. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. We use a variety of security technologies and procedures to help protect your personal information from unauthorised access, use, or disclosure. While CPL Specialist Talent takes all due care in ensuring the privacy and integrity of the information that you provide, we recognise that no data transmission over the Internet can be guaranteed to be 100% secure. The possibility exists that this information could be unlawfully observed by a third party while in transit over the Internet. CPL Specialist Talent accepts no liability should this occur.

Cookies

Cookies is a text file that is stored on your computer's hard drive relating to your viewing history of a website. If you return to that website, it can present tailored selections to you created upon the stored information about your last visit. You can normally adjust the settings of your browser to avoid the acceptance of cookies. Cookies will not harm your system.

We use site tracking software to monitor traffic patterns and site usage to help us develop the design and layout of the websites.

Security: These cookies allow us to securely access to your account

Preference: These cookies are used to store your preferences like language choice and display of job search results

Analytics: In order to monitor how our sites are performing, we collect data about page visits. This information is completely anonymous — we cannot determine who it came from. When we use this data, we look at numbers of visitors overall rather than individual visits.

Analytics information is used in reports and to improve our site. For example, we have used analytics data to add, remove or change features of the site based on how popular they are with users. We track, for example

- Page views
- Popular times
- Length of visit
- Where visitors came from
- Technical data about devices or browsers used to access the site

We use Google to provide our analytics data. You can read more about how Google Analytics treats your data at: [Google: Safeguarding your data](#). You can also read [Google's full privacy policy](#).

Site features: We track which jobs you look at so we can show you similar roles.

Session: As you move through the site, various pieces of information need to be stored in order for the site to function properly. For example, if you perform a search for jobs, the search terms you use will be remembered so that you can change them later. If you log in, we will remember which account you logged in with.

Changes to this Privacy Policy

Where a change is made to this Privacy Policy it will be set out on our websites to ensure that you are aware of what information we collect and how we will use it. If we plan to use Personal Data in a way that is inconsistent from that stated in this Privacy Policy, we will inform in advance you by email, and it will be your decision as to whether or not you are happy that we continue store and process your information.

Data Protection Officer Contact Details

The Data Protection Officer for the business and contact details are as follows;

DPO: Odette Armitage, Operations Director

Email address: Odette.armitage@cpl.com

Phone: 07584147660

This privacy policy is effective from 14.05.2018