

PRIVACY NOTICE

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1 General

Cpl Specialist Talent Limited ('Cpl Specialist Talent') is committed to protecting all personal and special categories of data held on you.

Cpl Specialist Talent is part of the Cpl Group of companies and for data protection purposes, is the controller and responsible for your personal data.

As such, Cpl Specialist Talent wants you, the 'data subject', to understand how Cpl Specialist Talent collects, uses, stores and shares your personal data. Cpl Specialist Talent also wants you understand what rights you can invoke to help you to protect your privacy. In this regard, it is important that you read this Privacy Notice and understand how Cpl Specialist Talent uses your personal data. Please note that Cpl Specialist Talent reserves the right to update this Privacy Notice as required. The most recent version of this document can be found on Cpl Specialist Talent's website through the following link: <https://www.cplspecialist.co.uk/privacy-policy/>

1.1 Cpl Specialist Talent Information

Cpl Specialist Talent is recruitment company with a focus on job placement in the science, technology, engineering, mathematics and health sectors across the UK. Cpl Specialist Talent provides recruitment services and matches people with the right jobs every day.

Cpl Specialist Talent is committed to protecting the rights and privacy of individuals in accordance with both European Union and United Kingdom data protection legislation. Cpl Specialist Talent shall lawfully and fairly process personal data about candidates, employees, clients, and other stakeholders to achieve its mission and functions.

If you wish to locate further information on Cpl Specialist Talent, you can find this on the Cpl Specialist Talent website through the following link: <https://www.cplspecialist.co.uk/>

1.2 Legislation

All personal data processed by Cpl Specialist Talent is done so in accordance with the Data Protection Act 2018 and the General Data Protection Regulation 2018 (GDPR).

1.3 Queries and Complaints

If you are unhappy with the way Cpl Specialist Talent handles your personal data and wish to complain, or if you simply want further information about the way your personal data will be used, please contact Cpl Specialist Talent at the below:

Data Protection Officer
Cpl Specialist Talent Limited
Northside House
69 Tweedy Road
Bromley
United Kingdom
Telephone: +44 0203 923 8877

Email: dataprivacy@cpl.com

You have the right to lodge a complaint with the Data Protection Commission. To contact the Data Protection Commission, please use the following details:

Data Protection Commission

21 Fitzwilliam Square South

Dublin 2

D02 RD28

Ireland

Telephone: +353 (0)761 104 800

Telephone: +353 (0)57 868 4800

Email: info@dataprotection.ie

1.4 Breaches

Cpl Specialist Talent will take all appropriate technical and organisational steps to safeguard your personal data. In the unlikely event of a data breach, Cpl Specialist Talent will contact you in line with Cpl Specialist Talent's legal obligations.

2 How Does Cpl Specialist Talent Collect Information?

Cpl Specialist Talent collects personal data to enable the provision of services to support the Cpl Specialist Talent purpose. The following non-exhaustive methods of data collection are an indication of ways in which Cpl Specialist Talent may obtain your information:

- Obtain personal data directly from you;
- Personal data that Cpl Specialist Talent receives from other sources; and
- When entering Cpl Specialist Talent's premises, you will be recorded on CCTV surveillance and the Visitor Sign In tablet/book for security purposes.

It is important that the personal data you provide Cpl Specialist Talent is up to date and accurate. As outlined in Section 7.4 of this notice, if personal data Cpl Specialist Talent hold on you is inaccurate or incomplete, please contact Cpl Specialist Talent to update the information.

3 What Does Cpl Specialist Talent Use Information For?

3.1 Process, Purpose, and Lawful Basis

Cpl Specialist Talent uses personal data collected to fulfil Cpl Specialist Talent's obligations to provide recruitment services and to enable the provision of services to support the Cpl Specialist Talent purpose.

Cpl Specialist Talent uses personal data for any of the following purposes:

Process	Purpose	Lawful Basis
Pre-Recruitment	To register a prospective data subject's interest in recruitment for employment.	<p>Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>The processing is necessary for the exercise of rights and obligations under employment law.</p>
Background Checks	To verify if the data subject is qualified and eligible for certain positions within Cpl Specialist Talent.	Processing is necessary for compliance with a legal obligation to which Cpl Specialist Talent is subject.
Recruitment and Selection	To complete the recruitment process and assess data subject suitability.	<p>Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Processing relates to Cpl Specialist Talent's obligations in employment and for assessing data subject's work capacity.</p>
Pension	To administer a data subject's pension entitlement and to comply with pension rules.	<p>To comply with various pension laws.</p> <p>Processing is necessary for the performance of a contract to which the data subject is party.</p>
Payroll	To enable Cpl Specialist Talent to effect payment to the data subject.	Processing is necessary for the performance of a contract to which the data subject is party.
Personnel File	To comply with employment and revenue laws and to ensure that terms and conditions of employment are adhered to.	<p>Processing is necessary for the performance of a contract to which the data subject is party.</p> <p>To comply with various employment and revenue laws.</p>

		To protect the vital interests of the data subject in the event of an accident or emergency.
Entitlement to Work	To enable Cpl Specialist Talent to achieve compliance with its obligations pursuant to any local legislation governing the entitlement to work.	Processing is necessary for compliance with a legal obligation to which Cpl Specialist Talent is subject.
Time and Attendance Records	To enable the data subject to avail of their rights and entitlement pursuant to the Working Time Regulations 1998.	The processing is necessary for the performance of contract to which the data subject is party.
Statutory Entitlement	To enable Cpl Specialist Talent to achieve compliance with: <ul style="list-style-type: none"> • Its obligation to the data subject; • Record keeping obligations pursuant to a variety of employment law statutes. 	The processing is necessary for compliance with legal obligation to which Cpl Specialist Talent is subject.
Training Records	To ensure that Cpl Specialist Talent is in a position to assess the data subject's training needs and to capture proof of training.	The processing is necessary for the performance of contract to which the data subject is party.
Performance Details	To manage the data subject's performance in accordance with relevant Cpl Specialist Talent policies.	The processing is necessary for the performance of contract to which the data subject is party.
Grievance and Disciplinary	To ensure the data subject's complaints are fairly investigated in accordance with Cpl Specialist Talent policies.	To comply with Cpl Specialist Talent legal obligation to apply fair procedures to any data subject's investigation. The processing is necessary for the performance of contract to which the data subject is party.
Medical Information	To manage the data subject's absences, to manage sick pay in accordance with the contract of employment, and to manage the fitness to work of data subjects.	Processing is necessary to assess, subject to data subject safeguards, the working capacity of the data subject. To carry out obligations and exercise rights under employment law.
Making or Receiving Payments	To make or receive any payments in the discharge of normal business functions,	Processing is necessary for compliance with various

	dispute settlement, or to carry out any other payment requirements.	employment and revenue laws. The processing is necessary for the performance of contract to which the data subject is party.
Customer Feedback	To obtain the data subject's feedback by survey on the Cpl Specialist Talent recruitment processes, client services and for research purposes.	Processing is based on request of consent which will be taken from the data subject.
Candidate Images and Videos	To obtain the data subject's photos which are used externally (e.g. Cpl Specialist Talent's website, on social media or even in marketing) for campaigns.	Processing is based on request of consent which will be taken from the data subject.
Attracting Talent	To provide support and assistance on recruitment services to data subjects via third party sources, such as LinkedIn and other job sites, from which Cpl Specialist Talent obtain personal data.	Processing is based on legitimate interest.
Supporting Talent	To support data subjects in their career guidance and communicate with them directly with useful information, advice, and support materials through email, messaging, or mobile/web notification.	Processing is based on legitimate interests and contractual obligations.
Regulatory Compliance	To comply with financial regulations and any other relevant laws and regulations.	Processing is necessary for compliance with a legal obligation to which Cpl Specialist Talent is subject. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
Third Party Data Sharing	To allow Cpl Specialist Talent to conduct and carry out functions with third party service providers that enable Cpl Specialist Talent	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the

	to deliver Cpl Specialist Talent's services.	request of the data subject prior to entering into a contract.
Back-ups	To store personal data and make back-ups of that data in case of emergencies and for disaster recovery purposes.	Processing is necessary for compliance with a legal obligation to which the Cpl Specialist Talent is subject.
Evidence Submissions	To gather information for dispute resolution services and legal proceedings.	Processing is necessary for compliance with a legal obligation to which the Cpl Specialist Talent is subject.
Transfer of Information for Parties Legal Proceedings	To allow parties to commence legal proceedings.	Processing is necessary for compliance with a legal obligation to which the Cpl Specialist Talent is subject.
CCTV systems	For the security, health, and safety of individuals on Cpl Specialist Talent's premises.	Processing is based on legitimate interest and is necessary for compliance with a legal obligation to which Cpl Specialist Talent is subject.
Accidents and Incidents	To enable Cpl Specialist Talent to comply with record keeping obligation pursuant to the Health and Safety at Work Act 1974.	Processing is necessary for compliance with a legal obligation to which Cpl Specialist Talent is subject.

4 Who Does Cpl Specialist Talent Share Information With?

Cpl Specialist Talent may share personal data with other parties in the course of Cpl Specialist Talent's duties. When this is done, Cpl Specialist Talent adheres 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, Cpl Specialist Talent ensures appropriate technical and organisational safeguards are used to protect your personal data.
- Where Cpl Specialist Talent engages a third party to provide a service to Cpl Specialist Talent, Cpl Specialist Talent ensures the provider has taken appropriate technical and organisational measures to process, store, and safeguard your personal data.
- Cpl Specialist Talent, as a Data Controller, will not sell your data to any third party and will take all appropriate steps to ensure the security of your data in dealings with third parties.

While the parties Cpl Specialist Talent engages may change occasionally, Cpl Specialist Talent believes it is important you are aware of the types of parties Cpl Specialist Talent shares data with. The categories and types of third parties outlined below is a non-exhaustive list but provides an indication of the parties Cpl Specialist Talent shares data with.

4.1 Other Third Bodies

Third parties for the purposes of internal and external audits, carrying out research, general practitioners, and or third parties who may improve Cpl Specialist Talent’s processes and services (such as consultants).

4.2 Government Departments, Bodies or Agencies

Cpl Specialist Talent is legally obligated to share personal data with state actors which is outlined in the Data Protection Act 2018.

Recipients of this data include Government departments such as HMRC, agencies, bodies, investigatory bodies and local authorities.

4.3 International Transfers

Where personal data is transferred outside the European Economic Area, Cpl Specialist Talent use safeguards known as Standard Contractual Clauses (SCCs).

5 What Type of Information is Collected?

To fulfil Cpl Specialist Talent’s mandate and perform tasks as outlined in this statement, Cpl Specialist Talent needs to collect various types of personal data.

While the type of personal data may change occasionally, Cpl Specialist Talent believes it is important you are aware of the types of data Cpl Specialist Talent gathers and uses. The following table is a non-exhaustive list and provides an indication of the categories and types of data Cpl Specialist Talent uses to perform Cpl Specialist Talent’s tasks.

Please note that information listed under one category may be used for the performance of a task or in relation to activities under another heading or as outlined under Section 3.

Category	Type of Data
Candidates	<ul style="list-style-type: none"> • Candidate Name, date of birth, gender, marital status, location, salary expectations, contact history, personal profile, compliance information, stored documents, cv, contact details, contracts details, pay details, tax information, bonus details, qualifications, disability details, images, identification documents, employment history including references interview feedback and interview notes, performance details such as probation forms, review forms, grievance & disciplinary

	<p>documents and training records, bank account details, pension, tax details.</p> <ul style="list-style-type: none"> • Special data revealing data such as ethnicity, sick leave details, occupational health assessment, medical information, incident reports, meeting notes and doctor notes, right to work documents such as passport and visa. • Criminal data such as Disclosure Barring Service documents.
Employees	<ul style="list-style-type: none"> • Contact details, contracts details, pay details, tax information, bonus details, qualifications, disability details, identification documents, employment history including references interview feedback and interview notes, performance details such as probation forms, review forms, grievance & disciplinary documents and training records, bank account details, pension, tax details • Special data revealing data such as ethnicity, sick leave details, occupational health assessment, medical information, incident reports, meeting notes and doctor notes, right to work documents such as passport and visa.
Other Stakeholders	<ul style="list-style-type: none"> • Contact details, bank details, invoices, tax details and bank statements, proof of address, company registration documents, client details.

6 How Long Does Cpl Specialist Talent Retain Information?

Cpl Specialist Talent have developed a record retention schedule for all the personal data Cpl Specialist Talent holds. Each retention period varies dependent on the nature and the purpose of the processing.

The main factors which determine retention periods are as follows:

1. How long it is required to perform the task;
2. Any legal requirements to hold onto the data;
3. Any pending legal actions.

If you would like to see a copy of the Retention Policy, please contact the DPO at dataprivacy@cpl.com

7 What Are Your Rights?

As a data subject, you will have the following rights as outlined in this section. **However, restrictions may apply in certain situations.**

7.1 Where do I send requests?

Please send all your requests to the contact details provided in Section 1, with as much detail as possible about your requirements to allow Cpl Specialist Talent to deal with your request efficiently. To answer your request, Cpl Specialist Talent may ask you to provide identification for verification purposes.

7.2 How long will a request take?

Upon receipt of a request, Cpl Specialist Talent will have 30 days to provide an answer with an extension of two further months if required. If Cpl Specialist Talent requires more time to deal with your request, Cpl Specialist Talent will notify you of the delay and the reasons behind it within 30 days of the receipt of the request. If Cpl Specialist Talent refuses your request, Cpl Specialist Talent will also notify you within 30 days of the receipt of the request accompanied by the reasons for the refusal.

Cpl Specialist Talent will not charge a fee for any requests, provided Cpl Specialist Talent does not consider them to be unjustified or excessive. If Cpl Specialist Talent does consider these to be unjustified or excessive, Cpl Specialist Talent may charge a reasonable fee (also applicable for multiple copies) or refuse the request.

You are entitled to contact the Data Protection Commission if Cpl Specialist Talent refuses your request.

7.3 Right of Access

You have a right to know what personal data Cpl Specialist Talent holds on you, why Cpl Specialist Talent holds the data, and how Cpl Specialist Talent is processing your personal data.

When submitting your request, please provide Cpl Specialist Talent with information to help verify your identity and as much detail as possible to help Cpl Specialist Talent understand the information you wish to access (i.e. date range, subject of the request) and email dataprivacy@cpl.com

Please note that an access request is free of charge, however, where Cpl Specialist Talent determines a request to be unjustified or excessive, Cpl Specialist Talent may charge you a reasonable fee.

7.4 Right to Rectification

You have a right to request that Cpl Specialist Talent's information held on you is up to date and accurate.

Where information is inaccurate or incomplete, Cpl Specialist Talent encourages you to contact Cpl Specialist Talent to have this information rectified. Upon receipt of request, Cpl Specialist Talent will ensure that the personal data is rectified and as up to date as is reasonably possible.

7.5 Right to be Forgotten

You have the right to seek the erasure of your personal data in the following circumstances:

- The personal data is no longer required for the purposes for which it was obtained;
- Where data is being processed on the basis of consent, you withdraw consent to the processing and no other lawful basis exists;
- The personal data is being unlawfully processed;
- You object to the processing of personal data and there are no overriding legitimate grounds for the processing;
- Your personal data requires deletion in line with legal requirements.

However, Cpl Specialist Talent will be unable to fulfil an erasure request if the processing of personal data is necessary for the following:

- Exercising the right of freedom of expression and information;
- Compliance with a legal obligation or for the performance of a task carried out in public interest;
- Reasons of public interest in the area of public health;
- Archiving or statistical purposes in the public interest;
- The establishment, exercise, or defence of legal claims;

Please note that where the legal basis for Cpl Specialist Talent's processing of personal data is on the basis of a legal obligation, some processing in relation to your data may not be subject to the right to erasure.

To determine your request for erasure, Cpl Specialist Talent will carry out an assessment of the justification for the retaining your personal data where a legal requirement applies and contact you if Cpl Specialist Talent are unable to fulfil your request.

Please be aware that in some circumstances Cpl Specialist Talent may need to retain some information to ensure all of your preferences are properly respected. For example, Cpl Specialist Talent cannot erase all information about you where you have also asked Cpl Specialist Talent not to send you marketing material. Otherwise, Cpl Specialist Talent would delete your preference not to receive marketing material.

7.6 Right to Restriction

You have the right to restrict the extent of personal data processed by Cpl Specialist Talent in circumstances where:

- You believe the personal data is not accurate (restriction period will exist until Cpl Specialist Talent updates your information);
- The processing of the personal data is unlawful, but you wish to restrict the processing of data rather than erase it;
- Where the personal data is no longer required by Cpl Specialist Talent, but you require retention of the information for the establishment, exercise, or defence of a legal claim;
- You have a pending objection to the processing of the personal data;

When processing is restricted, your personal data will only be processed: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of other people; or for reasons important to public interest.

Cpl Specialist Talent will contact you confirm where the request for restriction is fulfilled and will only lift the restriction after Cpl Specialist Talent have informed you that Cpl Specialist Talent are doing so.

7.7 Right to Data Portability

You have the right to the provision of all personal data held in relation to you in a structured, commonly used and machine-readable format where:

- Processing is completed on the basis a contract;
- Processing is completed based on consent by the you;
- Processing is carried out by automated means.

You may also request that Cpl Specialist Talent sends this personal data to another data controller where technically feasible.

7.8 Right to Object

You have the right to object to the processing of your personal data; however, the processing must have been undertaken on the basis of public interest or legitimate interest by Cpl Specialist Talent.



If you wish to object to the processing of data, please contact Cpl Specialist Talent with your request. Cpl Specialist Talent will then stop the processing of personal data unless it is required for legal proceedings.