

# Privacy and Cookie Policy

ECR Global's Privacy Policy outlines the ways in which we collect and process personal data, and covers the personal data of candidates, clients, website users, suppliers and third-party contacts we may speak to in order to find out more about candidates. Your privacy is important to us and we are fully committed to protecting and safeguarding your data privacy rights.

ECR Global Ltd (company no.3799835), of Brosnan House, Byng Drive, Potters Bar, Herts EN6 1UR is the data controller (“we”, “us”, “our” or “**ECR Global**”) and is responsible for your personal data. ECR Global are a registered data controller with the Information Commissioner's Office (registration no. ZA 312479).

ECR Global's data protection manager can be contacted at [info@ecrglobal.com](mailto:info@ecrglobal.com). Should you have any concerns, we would appreciate the chance to deal with them in the first instance. However, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

## What types of personal data do ECR Global collect?

- For candidates, our aim is to provide you with a highly tailored and personal recruitment service and in order to match your profile to relevant employment opportunities, there is certain personal information that we need to collect. ECR Global will only ever request, use, store, transfer and process personal information that will assist us with the recruitment service we are providing, and this could include but isn't limited to your name, address, email address, telephone number, bank account, payment card details, employment history, salary, skills and attributes, education details, qualifications, National Insurance Number and your login data including your username and password.
- **Special Category:** In addition, clients may require us to carry out financial or criminal background checks on our candidates, verify their identity using their passports or provide them with diversity information, so there may be additional personal data we need to collect to facilitate these procedures. Diversity information (including details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political orientation, political opinions, trade union membership, information about your health and genetic and biometric data) will only be collected and processed with your explicit consent.
- For business clients, there is certain personal data we need to collect, use, store, transfer and process about your organisation and individuals who work there in order to provide an agreed service (e.g. finding suitable candidates for a vacancy). ECR Global will only collect and process personal information that will help us to assist you with the agreed service, and this could include but isn't limited to name, job titles, email addresses and phone numbers of individuals within the organisation.
- For suppliers, there are certain details that we need to collect, use, store, transfer and process such as contact details of individuals who work within the organisation and bank details so that we can pay you.
- ECR Global may also collect, use, store, transfer a limited amount of personal data about the visitors of our website. This could include but isn't limited to your IP address, your log in data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the services you use to access the website and information relating to how you engage with the website (e.g. time spent on the website, number of visits, pages visited etc.).
- We may collect information about individuals from a candidate or member of staff for referencing or emergency contact purposes including name, address and contact number.
- We may also collect, use, store and transfer information relating to opinions and market insights for future research and insight services.

## How do ECR Global collect personal data?

- For candidates, ECR Global will generally collect personal information directly from you in order to help us find suitable employment opportunities. There are numerous ways in which this could occur, including the submission of a CV, when you apply for a position directly via the ECR Global website or during a phone call or email communication with a ECR Global consultant. Additional information about candidates may be provided by clients when in conversation. We may also obtain information about you from third-party sources, such as LinkedIn, job sites including jobserve.com and other data providers. In this instance, we will notify you that personal information has been collected and how we intend to use it. From time-to-time, we may be required to collect personal information from third-parties for verification or vetting purposes.
- For clients, we would generally collect personal information about your organisation and individuals within that organisation as the result of a direct communication, where either the client has contacted ECR Global via phone or email or where ECR Global has contacted the client by phone or email. Additional information about clients may be provided by candidates when in conversation with ECR Global.
- For suppliers, we will generally collect personal information from you when we enter into an agreement of work or service.
- From your current employer, particularly if you are employed by an umbrella/payroll company or personal service company. **Please note: In these circumstances, when you are engaged through such a company, we will be relying on your employer to ensure they have established a legal basis for processing your data with you. Our basis for the ongoing processing of your data will become subject to a contract between us and that company.**

## How might ECR Global use your personal data?

- For candidates, we will commonly use the personal information we've collected to provide you with a highly tailored and personal recruitment service. The more relevant the information we're able to collect, the better equipped we are to present you with appropriate and desirable employment opportunities. Your personal information will be stored and updated within our secure database, and may be used:
  - To match your details against job vacancies in order to assess your suitability for the role.
  - To apply for jobs on your behalf, where we will discreetly send your details to a client.
  - To allow you to submit a CV or apply for specific jobs on our website.
  - To enable us to carry out any obligations relating to contracts between yourself and a third party, such as your employer.
  - To facilitate our payroll or invoicing processes.
  - To market and develop other ECR Global product or services.
  - For customer insights and research purposes.
  - To obtain references
- For clients, we will use the personal information gathered about your organisation and individuals within that organisation to assist us with the delivery of an agreed service. This will most commonly be the sourcing of suitable candidates for a job vacancy, but could also include a bespoke service such as ECR Global's Technical Advisor Workshop or an on-site scoping meeting.
- For suppliers, we will generally use the personal information collected to ensure we can easily contact you if necessary and pay you for an agreed service.
- For website users, the data collected may be used to analyse the performance of the ECR Global website and improve its functionality.

- For individuals that we receive data for from candidates or staff for referencing or emergency contact purposes, we will only use your personal information to contact you as and when required (e.g. for a referee when we need a reference for a candidate or staff member, or for emergency contacts in the case of an accident or emergency).
- For all of the abovementioned individuals, including candidates, clients, suppliers, website users and referees, most commonly we will also use your personal information in the following circumstances:
  - Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
  - Where we need to comply with a legal or regulatory obligation.

## Who do ECR Global share your data with?

- For candidates, we will need to share certain personal information with other parties in order to help find you employment opportunities. Most typically this will include discreetly sharing relevant details with a client/potential employer in relation to a specific vacancy or on a more speculative basis. We may also be required to share your personal information with third-party service providers who perform functions on our behalf (e.g. in the instance of a financial or criminal background check, our accountants, payroll service providers and HM Revenue & Customs, regulators and other authorities acting as processors in the United Kingdom).
- For clients, we will need to share some of the personal information about your organisation with suitable candidates in order to assist you with your resourcing requirements.
- For candidate and clients, we may share your personal information with marketing technology platforms and suppliers or IT storage providers.
- For suppliers, we may need to share your details with other services providers or organisations to whom we provide services.
- For website users, we will share your personal information with web analytic services, to help us analyse and improve the functionality of the website.
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If ECR Global Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

## How will ECR Global keep your personal data secure?

- Keeping your personal data secure is extremely important to us at ECR Global, and we have put measures in place to prevent the misuse of your data and unauthorised access to it.
- ECR Global holds personal data relating to our candidates, clients and suppliers in a variety of places, including within our CRM system, saved on the computers of ECR Global employees, within Microsoft applications, in emails, and within paper files.
- Processes are in place to protect your personal data, including:
  - Computer passwords
  - The encryption of data and restricted access of specific data within our CRM system to authorised staff only
  - A restricted printing policy within our working environment
  - Staff training to increase awareness on the importance of data privacy and company processes
  - Virus checking
  - Regular auditing of data and data integrity checks

## Where do ECR Global store your data?

- In nearly all instances, your personal information will be stored securely and backed up within the UK, however in some rare instances the data we collect may be transferred to, processed and stored at a destination outside of the European Economic Area (EEA) (e.g. if

you apply for a specific job outside of the EEA). If this were to occur, we would gain your explicit consent beforehand.

## How long do ECR Global keep your personal data for?

- ECR Global will keep your personal data no longer than necessary and will remove personal data when it is no longer required. We will usually keep data for the following durations:
  - Permanent candidate data (Placed) – Up to 10 years from commencement of employment
  - Permanent candidate data (Not Placed) – Up to 10 years from collection of data
  - Contractor data (Placed) – Up to 10 years from the end of an assignment
  - Contractor data (Not Placed) – Up to 10 years from collection of data

## How can you access your data?

- In accordance with the General Data Protection Regulation (Regulation (EU) 2016/679), you have the **right to be informed** about the collection and use of your personal data. If you would like to get in touch with us about the data that we hold for you, please contact us and we will respond to your request promptly and in any event within one month of receiving your request (unless the type of personal data request is exempt from the right of subject access).
- You have the **right to access** your personal data and supplementary information. This can include confirmation that your data is processed, access to your personal data, and other supplementary information. If you would like to access your data, please contact us and we will respond to your request promptly and in any event within one month of receipt. Any access request will usually be free of charge. We will endeavour to provide information in a format requested, but we may charge you a reasonable fee for additional copies.
- You have the **right to rectify** our personal data if you believe any of it to be incorrect or incomplete. Please contact us if you believe this to be the case and we will respond to your request promptly and in any event within one month of receipt.
- You have the **right to erasure** if you would like us to delete the personal data we have for you including if we no longer need it for the purpose we collected it, or you withdraw your consent. Please let us know verbally or in writing if you would like us to erase any of the personal data we hold for you and we will respond to your request promptly and in any event within one month of receipt. Following such a request we will erase your personal data without undue delay unless continued retention is necessary and permitted by law. If we made the personal data public, we will take reasonable steps to inform other data controllers processing your personal data about your erasure request.
- You have the **right to restrict processing** of your personal data in certain circumstances. In this instance we would only be able to store your data but wouldn't be able to carry out any further processing activities. This right could apply if you dispute the accuracy of the data we are processing about you, where you object to the processing of your data for our legitimate interests, where our processing of your data is unlawful but you would prefer that we ceased to process it rather than erase it, or where we have no further need to process your personal data but you require the data in order to assist with legal claims. Please contact us if you would like to exercise your right to restrict processing and we will respond to your request promptly and in any event within one month of receipt.
- You have the **right to withdraw consent**, whereby you may withdraw a previously given consent and we will cease to carry out that activity any longer unless we consider there is a legitimate reason for us to continue processing your data for this purpose. Please contact us if you would like to withdraw your consent and will respond to your request promptly and in any event within one month of receipt. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- You have the **right of data portability**, should you wish to transfer the data that we have for to another data controller. In this instance we will provide you with the personal data required in a commonly read format that is password encrypted. Please contact us to discuss this requirement and we will respond to your request promptly and in any event within one month of receipt.
- You have the **right to object** to us processing your personal data where we do so based on our legitimate interests or the performance of a task in the public interest or exercise of official authority, in the case of direct marketing (including profiling), or for the purpose of research and statistics. If your objection relates to the processing of personal data where we do so based on our legitimate interests or the performance of a task in the public interest or exercise of official authority and you feel it impacts your fundamental rights and freedoms, we will stop processing your personal data unless specific exemptions apply. If your objection relates to the processing of personal data for direct marketing purposes, we will stop processing your data for direct marketing purposes immediately. Please contact us if you would like to object to us processing your data for any of these purposes.

## What is ECR Global's legal basis for processing your data?

- In accordance with Article 6(1)(f) of the General Data Protection Regulation, which states that organisations can process data where it is necessary for the purposes of the legitimate interests pursued by the organisation or by a third-party, we believe that it is necessary for us to collect and process certain personal data in order to fulfil the functions and services that we offer, namely as a recruitment services provider.
- In short, whether you are a candidate or a client, we need certain details about you or your organisation in order to provide a highly tailored, efficient and personal service. Ultimately, we want to be able to find you new employment opportunities or help resolve your organisation's resourcing requirements, and there are certain personal details that we need in order to deliver these services.
- Business clients, we may collect and process certain personal data about your organisation and individuals within your organisation as follows:
- For individual referees of candidates, we may use personal data as follows:

## How do ECR Global use cookies?

A cookie is a file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a specific site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

ECR Global use traffic log cookies to identify which pages are being used. This helps us analyse data about traffic and improve our website in order to enhance it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie will not give us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer however this may prevent you from taking full advantage of the website.

## Changes to Privacy Policy

ECR Global's privacy policy may be altered or updated by ECR Global at any time. In the instance of a Privacy Policy update we will advise you of any changes on the ECR Global website.