

Privacy notice

This privacy policy advises what to expect in relation to personal information handled, collected and processed by Tudor International Executive Search and sets out how Tudor International uses and protects any information you provide.

Tudor International Executive Search Ltd. (“Tudor International”) hereto referred to as Tudor International which may also include reference to (“we”, “us”, “our”) is committed to ensuring that your privacy is protected. Should we ask you to provide certain information, by which you can be identified when using this website, you can be assured that it will only be used in accordance with this privacy statement.

Tudor International may change this policy from time to time. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 25 May 2018.

Tudor International, 35 Stamford New Rd, Altrincham, WA14 1EB is the Data Controller.

We acknowledge and agree that any personal data of yours that we handle will be processed in accordance with all applicable data protection laws in force from time to time. From 25 May 2018, the General Data Protection Regulations (“GDPR”) came into force.

Introduction

Tudor International is committed to protecting your data and respecting your privacy. This privacy notice sets out the basis on what personal data we collect relating to you and how it will be processed.

If you have any questions about this privacy notice or how Obscurant uses, holds or processes your information, please contact the data protection officer at info@tudor-international.com

Tudor International

Tudor International provides recruitment services (employment business/agency), including consulting and recruitment insourcing.

We collect and process personal data of the following types of people to allow us to carry out our business and provide services:

- Candidates – potential, current, previous relating to permanent, consulting or contract roles;
- Clients – potential, current, previous;
- Suppliers – providing services to us, or on our behalf including but not limited to personnel/recruitment services companies;
- Third parties – including managed service providers, recruitment agencies, recruitment businesses, vetting and validation services (including credit reference and criminal record agencies), government departments, previous employers;
- Employees;
- Employers/contractual engagers;
- Consultants/contractors, their personnel and directors.

The information we collect and process about you is in order to carry out our business and associated activities.

Your data

Information we collect/you provide

In the performance of our business and in communication with you via any method – including by not limited to phone, e-mail, text, social media, our website(s) etc we may collect data including your personal information. Such data may include:

- Your name;
- Your address;
- Your e-mail address;
- Your telephone number;
- CV/work history;
- Job preferences, including role, geographical areas and salary;
- Any other work-related information you provide, for example, education or training certificates;
- Passport;
- In some cases, permits and visas;
- Date of birth;
- National insurance number;
- Full details of job offers and placements;
- Outcome of criminal record checks and security clearance for certain roles;
- In certain cases, medical information
- References;
- Financial information (including, but not limited to, payroll details and terms, HMRC data, pension scheme details, court orders and statutory payments);
- A log of our communications with you by e-mail and telephone;
- Other information disclosed in discussion relating to entering into or potentially entering into a contract.

Website/social media interaction data

Upon visiting our website(s) or providing information or opinion via social media platforms we may automatically gather information covering the following:

- Registration, subscription and enquiries;
- Traffic, location, communication.

Other sources/third parties

As a necessity of performing our services, we will work with third parties – including managed service providers, recruitment agencies, recruitment businesses, vetting and validation services (including credit reference & criminal record agencies), government departments (DVLA, HMRC etc), previous employers/engagement organisations.

Should we require to perform pre-employment or pre-engagement screening in relation to you we will request consent prior to its commencement:

- Special categories of data;
- Medical information.

The basis for us processing this will depend on the circumstances but will usually be for one of the following reasons: it is necessary to protect health and safety or to prevent discrimination on the grounds of disability or where consent has been obtained, if required.

Criminal convictions

If a client asks us to attain a criminal conviction check as part of their pre-employment or pre-engagement screening process, we will contact you first to explain the process and gain your unequivocal consent to progress.

Diversity

If a client asks us to attain and report information related to ethnicity or diversity the scope of which may include ethnic background, age, gender, religion, disability, sexual orientation, and/or social-economic background we will request consent from you.

With the scope of this clause, covering potentially sensitive personal information, we will obtain your consent before we collect and/or process it, such consent is voluntary.

Should you wish to withdraw your consent of us using your personal information for these purposes, as is your right, this can be done by e-mail us at info@tudor-international.com

Holding your personal data and how we use it

Tudor International provides recruitment services (employment business/agency), including consulting and recruitment insourcing.

If you are a candidate or services business, we may use your data in the following ways:

- To match your skill sets with job vacancies and projects to assist in finding you the positions that most suit you;
- To put forward your details to our clients and prospective employers/engagers for you to be considered for vacancies and projects;
- To place you with our clients and prospective employers/engagers;
- To keep you informed of available opportunities as they arise;
- To keep you informed of the services offered by us;
- To inform clients of your contact details for interview or start work purposes;
- To carry out credit assessments and identity verification, right to work and background reference checks;
- To undertake relevant security and criminal record checks as required by our clients and prospective employers and as permitted by law;
- To deal with any medical and health and safety issues relating to certain positions;
- To put in place contractual arrangements and documentation once a role has been secured;
- To pay you if placed/engaged on assignment;
- To meet legal/regulatory obligations.

If you are a client or other third party, we may use your data in the following ways:

- To match candidate skill sets with job vacancies/projects to assist in filling your roles;
- To put forward candidate(s) details to you so they might be considered for vacancies/projects;
- To place those candidates with you and your organisation;
- To keep you informed of available candidates as they arise;
- To keep you informed of the services offered by us;
- To give your contact details to candidates for interview or start work details;
- To deal with any medical and health and safety issues relating to certain positions;
- To put in place contractual arrangements and documentation as required;
- To pay a temporary candidate if placed;
- To invoice you for our services;
- To meet legal/regulatory obligations.
- To provide information to you that we believe will be of interest.

Obscurant directly does not use your personal information to make automated decisions.

Reasons to hold and process your data

Legitimate Interests

We rely on Legitimate Interests to hold and process personal data in conducting and managing our recruitment business, such as confirming information from job applications and CVs to ensure a candidate has the required skills for a particular role or client. It can also apply to the processing of data that is in your interest, to ensure that we only put you forward for roles that you have matching skillset and would therefore give you the best chance of being successful when applying for the role.

If the processing of personal data is necessary to carry out services for you, such as to make introduction of a candidate to our clients, to apply for permanent employment, temporary worker placements, consulting assignments, or to carry out pre-engagement and pre-

employment screening services (we may require further consent in order to do this). The exchange of personal data of our candidates and our client contacts is a necessary part of this process and therefore viewed as being a legitimate business interest.

If we do process your personal information, we will always make sure we consider your rights carefully under data protection laws.

Contractual performance

We rely on contractual performance if we are in pre-, during- or post-engagement discussion, negotiation/or you are appointed/engaged to undertake an assignment/project at a client as a contractor, consultant or service provider. We will enter into a contract with you, the company you are employed by or a director of enabling engagement for that assignment / project. We will process your personal data as required during the process and assignment / project. This may include processing invoices, timesheets authorisation and other contractual obligations.

Legal obligation

We rely on legal obligation to hold and process your personal data to fulfil our legal obligations, for example we are required to submit a report to HMRC detailing any payments which we make to you along with other personal details which HMRC use to identify you.

Consent

We may at times ask for your explicit consent to share your data. This consent can be requested orally or in written form. Your responses will then be recorded on our system.

Should you wish to withdraw your consent of us using your personal information for these purposes, as is your right, this can be done by e-mail us at info@tudor-international.com

Disclosure of your personal data

Your CV and related information will be shared or sent to prospective employers/engagers, managed service providers, clients, internally with companies within the group. Once you have secured a placement, additional information will be provided to them to enable the placement to proceed. Such employers and clients will usually be located inside the European Economic Area (EEA) but may be outside of the EEA. Personal data shall not be transferred to a country or territory outside the EEA unless that country or territory ensures an adequate level of protection or the appropriate safeguards are in place for your rights and freedoms. Before such a transfer takes place outside of the EEA, we will provide you with further information concerning this and request explicit consent.

Your CV and related information will be shared or sent to third parties – including managed service providers, recruitment agencies, recruitment businesses, vetting and validation services (including credit reference & criminal record agencies), government departments (HMRC), legal advisors, previous employers and for invoicing you.

The legal basis for sharing personal data with 3rd parties and them processing include one or more of the following:

- Legitimate Interests
- Contractual Performance
- Legal obligation
- Consent

How we hold your information

All the personal data we have is stored on our database in the UK.

We have taken steps to provide a secure environment (logical and physical) as regards to your data the security environment is reviewed with the aim to provide the most secure

environment whilst balancing the practicality of performing and providing our services. Procedures and security controls are in place to restrict access to any part of the system(s) who are dedicated to delivery of our services and whose role requires them to have such access, provided on the principles of least privilege and segregation of duties.

Data arriving or sent to us in a non-encrypted, non-password protected and/or in paper-based form is deemed not to be secure/safe. We will endeavour to process such information as consistently and securely as possible however we make no guarantees.

We request that our suppliers have privacy policies and security procedures in place with the aim for them to maintain and keep secure any data they hold.

Retention of your data

Your data will be retained for no longer than is necessary and in accordance with our Data Retention Policy, which is regularly reviewed.

If you are a candidate or provider of services, your information will be held for as long as you are actively engaging with us in order to receive work finding services in line with the following:

- Permanent/fixed-term engagements – personal data will be held up to six years since last contact with you.
- Temporary assignments - personal data will be held up to six years since last contact with you, or the company you are assigned to.
- Contractor/temporary worker – assignment information will be held up to six years from the end date of your assignment for tax purposes.

We may hold your personal/financial data on our payment systems for tax, legal or compliance reasons while deleting your information from our main business operating systems including if you request to remove your data

Your rights

It is your right to request the following in relation to your personal data we hold and/or process:

- Correction – your personal information we hold or process.
- Deletion – if there is no good reason for us to hold or continue to hold or process your personal information.
- Restriction/suspension – potentially linked to investigation relating to your data's accuracy.
- Transfer of your personal information to another party in certain formats, if practicable.
- Objection to processing, relating to legitimate interest of us or third party (if we are relying on this) processing your personal information and there is something about your particular situation which makes you want to object to processing on this ground.

If you have a concern or wish to make a complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to Information Commissioner's Office at www.ico.org.uk/concerns

Should you wish to exercise any of your rights, please contact and address for the attention of the Data Protection Officer and send to Tudor International, 35 Stamford New Road, Altrincham, WA14 1EB or contact us by e-mail at info@tudor-international.com

Contact

Subject access request

Subject access request should be address to the data protection officer and sent to info@tudor-international.com

General

Should you have any questions regarding this privacy notice or any other personal data related matter(s) please contact and address for the attention of the data protection officer and send to info@tudor-international.com

Removal of consent

Should you wish to withdraw your consent of us using your personal information please contact and address for the attention of the data protection officer and send info@tudor-international.com

Rights access

Should you wish to exercise any of your rights, please contact and address for the attention of the data protection officer and send to Tudor International, 35 Stamford New Road, Altrincham, WA14 1EB or contact us by e-mail at info@tudor-international.com

Changes to our privacy notice

This privacy notice may be changed by Tudor International at any time and without notice.
This privacy notice version is effective from the 25 May 2018.

Liability

We do not accept any responsibility or liability relating to claims against any of our suppliers, third parties or any other person or business that we share your personal data within the performance or deliver