



Company Name	LTS Group Ltd
Policy Number	10
Policy Name	GDPR Privacy Policy
Version Number & Date	v2 September 2020

This policy to be reviewed annually to ensure compliance with retention of documents

The Data Protection Act 1998

The Company processes personal data in relation to its own staff, work-seekers and individual client contacts - therefore it is a “*data controller*” for the purposes of the Data Protection Act 1998.

1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

[If you have opted-in we may also send you marketing information and news via email/ text. You can opt-out from receiving these at any time by clicking “unsubscribe” when you receive these communications from us].

In some cases, we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

- Your consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you

b. Legitimate interest

This is where the Company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Managing our database and keeping work-seeker records up to date
- Providing work-finding services to you and our clients
- Contacting you to seek your consent where we need it

- Giving you information about similar products or services that you have used from us recently.

c. Statutory/contractual requirement [NOTE Error! Reference source not found.]

The Company has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements.) Our clients may also require this personal data, and/or we may need your data to enter into a contract with you. If you do not give us personal data, we need to collect we may not be able to continue to provide work-finding services to you.

d. Recipient/s of data [NOTE Error! Reference source not found.]

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Clients (whom we may introduce or supply you to)
- Former employers whom we may seek references from
- Payroll service providers who manage payroll on our behalf or other payment intermediaries whom we may introduce you to
- Other recruitment agencies in the supply chain

The Company holds personal data on individuals ("*data subjects*") for the following general purposes:

- Staff administration.
- Advertising, marketing and public relations.
- Accounts and records.
- Administration and processing of work-seekers personal data for the purposes of work-finding services.
- Confidential student files

The eight principles of data protection

The Data Protection Act 1998 requires the Company as data controller to process data in accordance with the principles of data protection. These require that personal data shall be:

1. Fairly and lawfully processed.
2. Processed for limited purposes.
3. Adequate, relevant and not excessive.
4. Accurate.
5. Not kept longer than necessary.
6. Processed in accordance with the data subjects' rights.
7. Kept securely.

"Personal data" means data, which relates to a living individual who can be identified from the data or from the data together with other information, which is in the possession of, or is likely to come into possession of the Company.

LTS Group collects, uses and processes a range of personal data about you during the registration and recruitment process to include:

- Your name
- Address
- Phone number
- Email address (personal)
- Any information included in your CV/application form and face to face interview information
- References
- Copies of your right to work documentation
- Qualifications and certificates
- Driving licence
- DBS checks and overseas police checks
- Details of skills and experience
- National insurance number

“Processing” means obtaining, recording or holding the data or carrying out any operation or set of operations on the data. It includes organising, adapting and amending the data, retrieval, consultation and use of the data, disclosing and erasure or destruction of the data. It is difficult to envisage any activity involving data, which does not amount to processing. It applies to any processing that is carried out on computer including any type of computer however described, main frame, desktop, laptop, iPad, Blackberry® or other mobile device.

Personal data should be reviewed on a regular basis to ensure that it is accurate, relevant and up to date and those people listed in the Appendix shall be responsible for doing this.

Personal data may only be processed with the consent of the person whose data is held. By instructing LTS Group to look for work and by providing us with personal data contained in a CV work-seekers will be giving their consent to processing their details for work-finding purposes

We will only use your personal data when we are legally allowed to do so. These are known as the ‘Legal Bases’

- We have reviewed the purposes of our processing activities and selected the most appropriate lawful basis (or bases) for each activity
- We have checked that the processing is necessary for the relevant purpose and are satisfied that there is no other reasonable and less-intrusive way to achieve that purpose
- We have documented our decision on which lawful basis applies to help us demonstrate compliance
- We have included information about both the purposes of the processing and the lawful basis for the processing in our privacy notice
- Where we process special category data, we have also identified a condition for processing special category data, and have documented this
- Where we process criminal offence data, we have also identified a condition for processing this data and have documented this.

Sensitive personal data

Personal data in respect of the following is “sensitive personal data”

- Any offence committed or alleged to be committed by them.
- Proceedings in relation to any offence and any sentence passed.
- Assess your suitability for employment or engagement including information on your health

In this case we will provide you with full details of the information we would like and why we need this. You have the right to consider whether you wish to consent to this information being shared and your consent can be withdrawn at any time.

LTS Group also processes other personal information and done only for the purposes of equal opportunities monitoring in line with our data protection policy. This may include racial and ethnic data, religious beliefs and sexual orientation. This data is given by you with your explicit written consent and can be withdrawn at any time.

2. Data retention

The Company will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time. For example, the Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation. This is currently 3 to 6 years.

Where the Company has obtained your consent to process your [personal/[and] sensitive personal data/specify which personal data], we will do so in line with our retention policy [(a copy of which is attached)]. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your [personal data/[and] sensitive personal] data].

3. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you
- The right of access to the personal data the Company processes on you
- The right to rectification of your personal data
- The right to erasure of your personal data in certain circumstances
- The right to restrict processing of your personal data
- The right to data portability in certain circumstances
- The right to object to the processing of your personal data that was based on a public or legitimate interest
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your [personal data/[and]sensitive personal data] you have the right to withdraw that consent at any time by contacting our compliance manager k.coles@ltsg.co.uk. Please note that if you withdraw your consent to further processing, that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where the Company will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.

Information security

From a security point of view LTS Group has robust procedures in place to ensure your data is safe. Your data is limited to those who require your data by law i.e. For work seeking purposes and who have a business need to know in order to carry out their job requirements.

Your rights:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

4. Data Security

The Company takes every precaution to protect our users' information. LTS Group has robust procedures in place to ensure your data is safe. Your electronic data is password protected and encrypted.

Only employees who need the information to perform a specific job (for example, consultants, our accounts clerk or a marketing assistant) are granted access to your information.

The Company uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/ the Internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/ the Internet.

If you share a device with others, we recommend that you do not select the "remember my details" function when that option is offered.

If you have any questions about the security at our website, you can email e.banks@ltsg.co.uk

5. Changes to this privacy statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.

6. Complaints or queries.

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: The Compliance Manager, Nikon House, 45 Silver Street, Enfield, EN1 3TN. Telephone 020 8362 3219

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

Communicating this Policy

This policy will be communicated to work seekers during the initial interview and will be updated annually or if any changes to legislation. This policy is available on the LTS Group Website.

Contact	Contact details	Comments
Landline	020 8362 3219	Office hours
Eddi Banks	07540 881687	Director
Karen Coles	020 8362 3219	Compliance Manager
Email contacts	e.banks@ltsg.co.uk ; k.coles@ltsg.co.uk	

SIGNED: MARK WILLIAMS

POSITION: CEO

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