

Summit Resourcing is specialist recruitment organisation. We provide proactive search solutions to clients in the advanced and emerging technology markets.

Summit Resourcing (Company Number: 12310480, Registered Office: 19 New Road, Brighton BN1 1EY).

At Summit Resourcing we take the security of your personal data seriously and are committed to protecting the privacy of our candidates, client contacts and users of our website.

This policy explains:

What information we collect about you when you use the Summit Resourcing website, or when you are communicating with us;

- How and why we collect and use your personal data;
- Where we store your personal data;
- How long we keep your personal data;
- When, why and with whom we share your personal data;
- The legal basis we have for using your personal data;
- The effect of refusing to provide the personal data requested;
- What rights and choices you have in terms of your personal data; and
- How we may contact you, and how you can contact us.

What is personal data?

Personal data is any information relating to an individual, whether it relates to his or her private, professional or public life. If either one piece of information about you, or that piece of information combined with another piece of data about you, means that you be identified then that is personal data.

Personal data can be anything from a name, a home address, a photo, an email address, bank details, posts on social networking websites, medical information, or a computer's IP address.

We collect the personal data about two main types of people to allow us to undertake our business: candidates (prospective, active and placed) for permanent or contract roles, and client contacts (prospective and current).

What personal data do we collect about you?

Candidates: We collect information necessary to be able to find available opportunities for you, and further information needed to assess your eligibility through the different stages of recruitment.

The personal data we collect is provided by you in CVs or resume, identification documents, education records, work history confirmation, employment details, references, visa (right to work) status, professional qualifications.

There may be occasions that we collect certain financial information from you (bank account and limited company details) in order to process your application if you are providing contracting services to our clients.

Client Contacts: We collect your contact information in order to fulfil our obligations to your organisation when you initiate a search for personnel. This information includes name, role title, company location, email address and business telephone numbers.

Supplier Contacts and Employees: We collect personal data about our suppliers and their contacts (to support our services), temporary and contract workers. Information about the collection, use and sharing of personal data about supplier contacts is covered in a Confidentiality Agreement for suppliers.

Where do we get your personal data from?

Here are some of the sources of the personal data we collect about you.

Candidates:

- Directly from you. This is information you provide freely while searching for a new job and communicating with us during the different recruitment stages, including your CV or resume. This also includes information you provide if you subscribe to our services, attend our events, participate in discussion boards or enter a survey.
- Job Applications. Knowing that we are searching and recruiting for a specific role. When you apply you are sending us your CV or resume, your name and contact details.
- Job Alerts. If you wish to stay subscribed for the purpose of keeping you informed, by email, of the latest jobs in your nominated industry. You will be expected to provide your name and email address which is used to stay connected.
- Through publicly available sources including: LinkedIn, Twitter, your business card, corporate websites, job board websites, online CV libraries;
 - industry and trade forums;
 - industry events and conferences;
 - recommendation or word of mouth. You may be recommended to us by a friend, a work colleague, a former or present employer; and
 - reference. You may be suggested by a candidate to act as a referee for them. In this case we will contact you to get your agreement to act as a referee, and to provide certain information. If you do not wish to act as a referee, we'll record this information without holding any other personal data about you.

Client Contacts:

- Directly from you. This is information you provide freely when you begin a search for personnel and when communicating with us during the different recruitment stages. This also includes information you provide if you subscribe to our services, attend our events, participate in discussion boards, enter a competition, promotion or survey.
- Through publicly available sources including: LinkedIn, Twitter, business Facebook, corporate websites; your business card;
 - industry and trade forums;
 - industry events and conferences.
 - recommendation or word of mouth. You may be recommended to us by a friend, a work colleague, a former or present employer.
 - references. You may be suggested by a candidate to act as a referee for them. In this case we will contact you to get your agreement to act as a referee, and to provide certain information. If you so not wish to act as a referee, we will record this information without holding any other personal data about you.

How and why do we use your personal data?

We use your personal data to provide recruitment services to you. This may include advising you of updates, news, events, reports and other information relevant to your industry by telephone, email, Social Media sites and other electronic means.

To maintain and improve our business relationship with you we may conduct research, surveys and analysis about salary trends, market benchmarks, skills mapping and industry initiatives in our specialist sectors. We anonymise or minimise the information to ensure individuals are not identified.

Candidates: We use your personal data to match your skills, experience and education with a potential employer. Initially we will collect basic information about you such as contact details, job title and experience. We will

pass this basic information together with your CV, remuneration details and our assessment of your suitability to our client in search of personnel. If you are selected by our client to progress further, we will collect more information from you as necessary at the interview stage, and at all the subsequent stages of the recruitment process.

Client Contacts: We use your personal data to communicate with you about searches for personnel and to send you details of suitable candidates. We may also use your personal data for our customer lists and to maintain our business relationship with you.

Where do we store your personal data?

Candidates: Personal data about you, contained in your CV and obtained during communication with us, is held on our secure cloud (Microsoft 365 OneDrive) to enable our consultants to provide you with recruitment services.

Client Contacts: Personal data about you is held on our secure cloud (Microsoft 365 OneDrive) to enable our consultants to provide you with recruitment services.

How do we protect personal data?

We follow the recommendations and guidelines to make sure your information is protected in line with the [National Cyber Security Centre](#).

How long do we keep your personal data for?

We only keep your information for as long as is necessary for us to use your information as described above, or to comply with our legal obligations. However, please be advised that we may keep some of your information after you stop using our services, for instance if this is necessary to meet our legal obligations, such as keeping the information for tax and accounting purposes.

When deciding relevant retention periods, we will take into account factors including:

- Our contractual obligations and rights in relation to the information involved;
- Legal obligation(s) under applicable law to retain data for a certain period of time;
- Our legitimate interest where we have carried out a balancing test (see legal basis below);
- Statute of limitations under applicable law(s);
- (potential) disputes;
- Requests to have information deleted; and
- Guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information where we no longer require it for the purposes collected.

Who do we share your personal data with?

Generally, we will share personal information with selected third parties including: clients, business partners, suppliers and subcontractors for the performance and compliance obligations of any contract: subcontractors including email marketing specialists, event organisers, payment and other financial services providers.

Candidates: Your personal data is shared with the client who has begun a search for personnel, so the client can decide if you are a good fit for the available position.

Our clients are organisations working in the following industry sectors: Information Technology (IT), Digital IT & Creative. Our clients are located in the UK.

Your financial data may be shared with selected third parties in order to process payments if you are providing Contracting services to our clients.

Client Contacts: Your personal data is shared with candidates during the recruitment stages during a search for personnel. In addition, your data will be shared with our internal Finance function to facilitate invoicing and other services.

What legal basis do we have for using your personal data?

Candidates: At all stages in the recruitment process our processing of personal data is necessary for our *legitimate interest*, because we need the information in order to:

- Survey the market for potential candidates;
- Assess suitability of individuals for roles;
- Discuss opportunities with potential candidates; and
- Assist candidates through the client interview, selection, offer and acceptance stages of the recruitment process.

When you are shortlisted for a particular role this may involve the collection and processing of more detailed personal data, including special category (or sensitive) personal data such as health information that you or others provide about you. In this case, we will always ask for your *consent* as the legal basis for undertaking such processing.

For candidates who are providing contracting services to our clients, and when candidates are placed in permanent roles, we process personal data because it is necessary for the performance of the *contract* (with you as the contractor and the client).

Client Contacts: At prospective client companies, the processing of personal data of client contacts is necessary for our *legitimate interest* i.e. to determine if the prospective client is interested in being a client. For client contacts at our established clients, our ongoing processing of personal data is necessary for our *legitimate interest*, and also in order to fulfil our *contractual* requirements with your organisation.

What happens if you do not provide us with the personal data we request, or if you ask us to stop processing your information?

If you do not provide the personal data necessary or withdraw your consent for the processing of your personal data, we may not be able to provide recruitment services to you as either a candidate or a client contact.

Do we make automated decisions about you?

No, we do not carry out any automated decision making. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

Do we use cookies to collect personal data about you?

We use Cookies when you visit our website. To provide better service to you on our website, cookies are used to collect your personal data when you browse. See our [Cookie Control](#).

What rights, options and choices do you have about the personal data we hold about you?

By law, you have a number of rights when it comes to your personal data. Further information and advice about your rights can be found from the data protection regulator in your country.

Rights:

- The right to be informed. You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.
- The right of access. You have the right to obtain access to your information (if we are processing it), and certain other information (similar to that provided in this Privacy Policy). This is so you're aware and can check that we're using your information in accordance with data protection law.
- The right to rectification. You are entitled to have your information corrected if it's inaccurate or incomplete.
- The right to erasure. This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
- The right to restrict processing. You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
- The right to data portability. You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
- The right to object to processing. You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
- The right to lodge a complaint. You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.
- The right to withdraw consent. If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.
- We usually act on requests and provide information free of charge. However, we can charge a reasonable fee to cover our administrative costs of providing the information for:
 - baseless or excessive/repeated requests
 - further copies of information already provided
 - Alternatively, we may be entitled to refuse to act on a request.

Please consider any request responsibly before submitting it. We'll respond as soon as we can.

Generally, this will be within one month (30 days) from the date we receive your request. If the request is going to take longer to deal with, we will let you know the estimate time to complete the request.

How will we contact you?

We may contact you by phone or email. If you prefer that we use another way to contact you, please let us know.

How can you contact us?

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to anthony@summitresourcing.co.uk.