

## **Graff Search Privacy Policy**

Graff Search Limited (“**Graff Search**”) is a recruitment agency and recruitment business.

Graff Search is committed to safeguarding the privacy of our candidates, clients and website visitors and to being transparent in how we collect and use your data in order to meet our data protection obligations. This policy sets out how we will treat your personal information.

We at Graff Search will ensure that the information that you submit to us (whether via our website or office(s)) will only be used in accordance with this privacy policy (“**Privacy Policy**”).

The General Data Protection Regulation (“**GDPR**”) (Regulation (EU) 2016/679) replaces the Data Protection Regulation (Directive 95/46/EC) from 25 May 2018. The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Your new rights under the GDPR are set out in this Privacy Policy, which applies from the GDPR becoming law on 25th May 2018.

Please read the following carefully to understand our views and practices regarding your personal data and how we will manage it.

### **Who Controls Your Personal Data**

The Data Controller is Graff Search Limited, a company registered in the UK.

Company Number: 09605687

Address: Graff Search, Level 4, Aldgate Tower, 2 Leaman Street, London, E1 8FA

Telephone: 020 8305 2837

[privacy@graffsearch.co.uk](mailto:privacy@graffsearch.co.uk)

### **What Information Do We Collect?**

We collect the personal data of prospective and placed candidates for permanent and temporary roles; prospective and current/live client contacts; supplier contacts who support our services; employees, consultants and/or temporary workers in order to allow us to undertake our business. This information is collected solely to enable us to carry out our core business and any ancillary services.

We may collect, store and use the following kinds of data (via email, website forms, email, phone or in person):

#### **Technical**

- information about your computer and about your visits to and use of this website, such as your IP address, geographical location, browser type, referral source, length of visit and number of page views.
- information relating to any correspondence carried out between you and us on or in relation to our website.

#### **Personal**

- information that you provide to us for the purpose of registering with us including but not limited to your name, job title, address, gender, date of birth, telephone number & email address.
- information that you provide to us for the purpose of subscribing to our website services, email notifications etc.

- links to your professional profiles available in the public domain e.g. LinkedIn.
- your competences, skills, experience and education, e.g. your CV or resume, previous employments, educational details and qualifications, third party references.
- your preferences, e.g. preferred country of employment, areas of interest as well as your preferred ways to be contacted by Graff Search.
- other information, such as information found from public sources as well as information depending on the position you are applying for, and where necessary for the recruitment activities.
- any other information that you choose to send to us.

## **How Do We Collect Personal Data**

Candidate data:

The two ways in which we collect your personal data are as follows:

Directly from you-

- Emailing your CV to Graff Search or to a Graff Search employee or being interviewed by a Consultant via telephone, FaceTime/Skype/vid con or in person.
- Applying for a job via the Graff Search website or via our third-party sources.
- Sending or leaving a hard copy of your CV with Graff Search.

From third parties-

- Clients may share personal information.
- Your Referees may disclose personal information about or from you.
- Personal information may be obtained from sources such as LinkedIn and job sites to which you subscribe, or through which you apply for jobs.
- Social Media (Twitter, Facebook etc.).
- Through referrals from an external source or through the Graff Search Rewards Programme.

Client data:

In order to provide you with the best possible service and to ensure you have the most suitable Candidates for your organisation, we collect your personal data in two ways:

Directly from you-

- When you contact Graff Search proactively, usually via telephone or email.
- When a Graff Search employee contacts you either via phone, email or in person.

From third parties (e.g. our Candidates or online/offline media)-

- From third party market research and individuals/companies in Graff Search's network.
- Search engines, social media, online networking sites such as LinkedIn.

Supplier data:

- We collect personal data during the course of working with you.
- People whose data we receive from Candidates/Clients such as Referees.
- We only collect personal data when a Candidate provides it in order for you to serve as a Referee.

## **Who We Share Your Data With**

Candidate data:

We may share your information with various parties in various ways. Primarily, we will share your information with prospective employers to increase your chances of securing a job. Graff Search will never disclose personal information without your permission and will only use your personal data as outlined in this Privacy Policy.

Client data:

Graff Search will only share your data, when instructed by the Client, to ensure that we are able to provide you with a suitable shortlist of Candidates.

Supplier data:

Unless you specify otherwise, we may share your information with associated third parties such as our service providers and organisations to whom we provide services.

### **Why We Process Your Personal Data (Legitimate Business Interests)**

As a recruitment business, our legal basis for the processing of personal data is our legitimate business interests, although we also rely on contract, legal obligation and consent for specific uses of data.

Graff Search introduces candidates to clients for permanent employment, fixed-term contract, temporary worker placements and/or independent contracts. The exchange of personal data of our candidates and our client contacts is a fundamental and essential part of this process.

In order to support our candidates' career aspirations and our clients' recruitment needs, Graff Search requires a database of candidate and client personal data containing historical information as well as current resourcing requirements.

To accurately maintain, expand and develop our business, Graff Search needs to record the personal data of prospective candidates and client contacts.

### **How We Use Your Personal Data**

Personal data submitted via our website will be used for the purposes specified in this Privacy Policy or in relevant parts of our website.

We may use your personal information to:

- administer the website.
- improve your browsing experience by personalising the website.
- enable your use of the services available on our website.
- send to you items requested via the website, and supply to you services requested via the website.
- send statements and invoices to you, and collect payments from you for services provided.
- send you general (non-marketing) commercial communications.
- send you email notifications which you have specifically requested.
- send to you any marketing communications relating to our business which we think may be of interest to you by post or, where you have specifically agreed to this, by email or similar technology. You can inform us at any time if you no longer require marketing communications to be sent by emailing us at [privacy@graffsearch.co.uk](mailto:privacy@graffsearch.co.uk).
- deal with enquiries and complaints made by or about you relating to our website.

We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.

### **Other Disclosures**

In addition to the disclosures reasonably necessary for the purposes identified elsewhere in this Privacy Policy, we may disclose information about you:

- to the extent that we are required to do so by law.
- in connection with any legal proceedings or prospective legal proceedings.
- in order to establish, exercise or defend our legal rights including providing information to others for the purposes of fraud prevention and reducing credit risk.
- to the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling.
- Except as provided in this Privacy Policy, we will not provide your information to third parties.

### **Retaining Personal Information**

Graff Search will retain your personal data for as long as deemed necessary in order to provide the recruitment service to you and for the purposes of satisfying any legal, accounting, regulatory or reporting requirements.

Graff Search does the following to try to ensure our data is accurate:

- prior to making an introduction, Graff Search checks that we have accurate information about you.
- Graff Search keeps in touch with you, so you can let us know of changes to your personal data.
- Graff Search makes use of external websites (e.g. LinkedIn) to verify the information about you.

The criteria used to determine whether Graff Search should retain your personal data includes:

- the nature of the personal data.
- its perceived accuracy.
- our legal obligations.
- whether Graff Search has been active with you as part of our general recruitment service (e.g. discussing roles with you, arranging interviews or placing you in a new role).
- our recruitment expertise and knowledge of the industry by country, sector and job role.

Graff Search may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our systems.

### **Storage and Security of Your Personal Data**

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. You acknowledge that data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

Once we have your personal information, it is stored on our online system (cloud based) which can only be securely accessed by employees of Graff Search. We may also gather information and statistics collectively about visitors to our website.

All of our internal systems are password and firewall protected and can only be accessed by employees of Graff Search, or suppliers of the business.

### **Transfer of Your Personal Data**

Graff Search may transfer data to countries or international organisations outside of the European Economic Area (EEA). For example, to Clients, Candidates, or third parties who provide us with support services. Where information is to be so transferred, it may be to a country in respect of which there is an adequacy decision from the EU Commission. However, if this is not the case, it is our policy to take steps to identify risks and in so far as is reasonably practicable, ensure that appropriate safeguards are in place.

In the event of a sale, merger, liquidation, receivership or the transfer of all or part of our assets to a third party, we may need to transfer your information to a third party. Any transfer will be subject to the agreement of the third party to this Privacy Policy and any processing being only in accordance with this Privacy Policy.

### **International data transfers**

We currently only operate from the UK. If we open overseas offices, information that we collect may be stored and processed in and transferred between any of these countries in order to enable us to use the information in accordance with this Privacy Policy.

Personal information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.

## **Consent to Processing Your Data**

We may process your personal data on the basis that you have consented to us doing so for a specific purpose. For example, if you have provided your contact details in order that we may use these to provide you with details of our additional services, you may have consented to our processing of the data for that purpose. In other cases, you may have provided your written or verbal consent to the use of your data for a specific reason, for example for requesting references from you.

You may withdraw your consent to our processing of your personal data for a particular purpose at any stage. Please see the section below, 'Your Rights'. However, please note that we may continue to retain, or otherwise use your personal information thereafter where we have a legitimate interest or a legal or contractual obligation to do so.

Our processing in that respect will be limited to what is necessary in furtherance of those interests or obligations. Withdrawal of consent will not have any effect on the lawfulness of any processing based on consent before its withdrawal.

## **Your Rights**

You may instruct us to provide you with any personal information we hold about you. Provision of such information may be subject to the supply of appropriate evidence of your identity. For this purpose we will usually accept a copy of your passport or an original copy of a utility bill showing your current address.

You may request correction of the personal information we hold about you, which enables you to have such incorrect or inaccurate information corrected.

You may request erasure of your personal information, enabling you to ask us to delete or remove personal information where there is no good reason for us to continue to process it.

You may object to processing of your personal information where Graff Search is relying on a legitimate interest (including those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. In this instance, you have the right to ask us to delete or remove your personal information.

You may request the restriction of processing of your personal information in which case you can ask us to suspend the processing of personal information about you.

You may instruct us not to process your personal data for marketing purposes by email to [privacy@graffsearch.co.uk](mailto:privacy@graffsearch.co.uk) at any time. In practice, you will usually either expressly agree in advance to our use of your personal data for marketing purposes, or we will provide you with an opportunity to opt-out of the use of your personal data for marketing purposes.

You may request the transfer of your personal information to another party in certain formats, if practicable.

We may withhold personal information that you request to the extent permitted by law.

You may make a complaint to the Information Commissioner's Office.

## **Policy amendments**

We may update this Privacy Policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

## **Contact**

You have the right to access information held about you. We would also be grateful if you could let us know if the personal information which we hold about you needs to be corrected or updated.

If you have any questions about this Privacy Policy or our treatment of your personal data, please contact us by email to [privacy@graffsearch.co.uk](mailto:privacy@graffsearch.co.uk).