

Company Name:	Bangura Solutions Limited ('the Company')
Company Contact details:	Simmane Bangura Managing Director 2 Tower House, Hoddesdon, Greater London, EN11 8UR 0203 854 1400
Document:	Privacy Policy
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The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with this privacy statement. At all times we will comply with current data protection laws.

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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.

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

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

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

2. Information to be provided when data collected not from the data subject

Categories of data: The Company has collected the following personal data on you:

Personal data:

- Name, address, mobile no., email, D.O.B, emergency contact details
- National insurance no.
- Nationality (through right to work check)

Sensitive personal data:

- Copy of Passport
- Bank Details
- Limited Company Insurance details
- Health information including whether you have a disability

Source of the personal data: The Company sourced your personal data/sensitive personal data:

- From IT jobs boards, Totaljobs, Monster, LinkedIn, Internet
- A former employer
- A referee whose details you previously provided to us

This information came from a publicly accessible source.

3. Overseas Transfers [Optional]

The Company may transfer the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

4. 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, we will do so in line with our data protection policy. 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.

5. 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 Simmane Bangura, Managing Director on 0203 854 1400 or email simmane@bangura.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.

If you believe that any of your data that the Company processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

6. Log Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

7. Links to external websites

The Company's website may contain links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Company's website.

8. Sale of business

If the Company's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

9. Data Security

The Company takes every precaution to protect our users' information.

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 Steve Day at websupport@recrutive.com.

10. 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.

11. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: by contacting Simmane Bangura, Managing Director on 0203 854 1400 or email simmane@bangura.co.uk.

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.

***Processing* is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional and subject to the necessary conditions and safeguards.**

1. *Processing* is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare and of medicinal products or medical devices, on the basis of EU or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the individual, in particular professional secrecy.
2. *Processing* is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard fundamental rights and interests of the individual.

GDPR Website Privacy Policy

Bangura Solutions gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

This policy is relevant to your use of the (“Company”) website and your relationship with the Company. This document also documents our data protection policy and the rights of individuals that the Company engages with (“Data Subjects”) in respect of personal data under the General Data Protection Regulation (“Regulation”). A ‘Data Subject’ may be an individual or an individual acting on behalf of a body corporate (i.e. a company director).

Please read them carefully as they affect your rights and liabilities under the law. If you do not agree to this Privacy Policy, please do not use the Company website or engage with us. If you have any questions on the Terms and Conditions, please contact us.

If you are seeking to instruct the Company for the provision of recruitment services, our standard terms and conditions shall apply.

General Data Protection Regulation (GDPR)

The General Data Protection Regulations defines “personal data” as any information relating to an identified or identifiable natural person (a data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This Policy sets out the procedures that are to be followed when dealing with personal data. The procedures and principles set out herein must be followed at all times by the Company, its employees, agents, contractors, or other parties working on behalf of the Company.

What Information Do We Collect and How Is That Information Used?

The Company may collect your personal details including, but not limited to, your name and contact details including your e-mail address and any other relevant information with your express permission. This information is held, used and disclosed by us in the following ways until permission is withdrawn:

- To continue to provide our services to you.
- To maintain our business relationship throughout the lifetime of that relationship, where you are a client or user of our website, services.
- To enable us to answer any queries you may have.
- To market our products and services to you; to keep you updated on any relevant industry news; to update you on any events, promotions and competitions, reports and any other information we feel may be relevant or of interest to you. You retain the right to unsubscribe from such communications at any time.
- To fulfil contractual obligations with you.
- To enable the development and marketing of other products and services by company.
- To continually improve our customer service efforts and to make our services more valuable to you.
- The Company may also release personal information to regulatory or law enforcement agencies, if they require us to do so. We will also only disclose your information where we are permitted and requested to do so by law.
- The Company will also seek your consent to collect, hold, use and disclose your personal information for any other purpose not listed above, but will continue to do so only if your permission is given and from which you understand you can withdraw permission.
- If we are holding historic data about you or your company that no longer is of use or has any significance it will be deleted unless you have given consent, or there is some kind of legal obligation, to retain it.
- Only members of the Company staff that need to have access to your information to carry out their normal duties will be allowed access to the information.
- By law we have appointed a representative to oversee the application of our privacy policy. That representative is Simmane Bangura, Managing Director and any concerns over the retention, use or disclosure of your information should be addressed to them via our contact page.

How long do we hold personal data?

We retain personal data for as long as a candidate is active and for 1 year afterwards, unless required to retain for a longer period by UK Tax Law; if this is the case we will only retain your basic personal data (name, address and contact information).

Data Processing for Specific Purposes Only

The Company collects and processes the personal data set out in this Policy. This may include personal data received directly from Data Subjects (for example, contact details used when a data subject communicates with us).

The Company only processes personal data for the specific purposes set out in this Policy (or for other purposes expressly permitted by the Regulation). The purposes for which we process personal data will be informed to Data Subjects at the time that their personal data is collected, where it is collected directly from them, or as soon as possible (not more than one calendar month) after collection where it is obtained from a third party.

The Company will only collect and process personal data for and to the extent necessary for the specific purpose(s) informed to Data Subjects.

The Company shall ensure that all personal data collected and processed is kept accurate and up-to-date, so far as reasonably practicable. Where any inaccurate or out-of-date data is found, all steps will be taken without delay to amend or erase that data, so far as reasonably practicable.

The Company shall ensure that all personal data collected and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Data Subjects may request that the Company ceases processing the personal data it holds about them. If a data subject makes such a request, the Company shall retain only the amount of personal data pertaining to that data subject that is necessary to ensure that no further processing of their personal data takes place.

Your Right to Access

The law states that you have the right at any time to ask us to share with you the information that we hold that you have supplied to us. If you make such a request we will ask you to verify your identity and possibly ask you to give us more information about such a request. We may need to charge a nominal fee for this service for administrative purposes. We will only refuse your request if we are legally permitted or required to do so. If this is the case then we will give you reasons for doing so. To make a request for information, please contact us.

Please be aware that you also have the right to ask the Company to stop using the information that you supplied us. Under the right to erasure you can also request for deletion of your file, although you should be aware that in some circumstances we may not be required or able to do so, particularly where your file also holds information about our clients or financial information that we need to keep for periods of up to six years; i.e. which relate to tax matters. If, under any circumstances, we cannot comply with your request for information we will provide a full explanation as to why this is so.

Deleting of Your Data

Data Subjects may request that the Company erases the personal data it holds about them in the following circumstances:

- It is no longer necessary for the Company to hold that personal data with respect to the purpose for which it was originally collected or processed;

- The data subject wishes to withdraw their consent to the Company holding and processing their personal data;
- The data subject objects to the Company holding and processing their personal data (and there is no overriding legitimate interest to allow the Company to continue doing so).
- The personal data has been processed unlawfully;
- The personal data needs to be erased in order for the Company to comply with a particular legal obligation.

Unless the Company has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request (this can be extended by up to two months in the case of complex requests, and in such cases the data subject shall be informed of the need for the extension).

Right to Suspend or Cancel Your Registration

We may suspend or cancel your registration immediately at our reasonable discretion or if you breach any of your obligations under these Terms and Conditions.

You can cancel your registration at any time by logging onto the Company website through the "unsubscribe" link. The suspension or cancellation of your registration and your right to use the Company website shall not affect either party's statutory rights or liabilities.

Data Subjects have the right to object to the Company processing their personal data based on legitimate interests (including profiling), direct marketing (including profiling).

Where a data subject objects to the Company processing their personal data based on its legitimate interests, the Company shall cease such processing forthwith, unless it can be demonstrated that the Company's legitimate grounds for such processing override the data subject's interests, rights and freedoms; or the processing is necessary for the conduct of legal claims.

Where a data subject objects to the Company processing their personal data for direct marketing purposes, the Company shall cease such processing forthwith.

Where a data subject objects to the Company processing their personal data for scientific and/or historical research and statistics purposes, the data subject must, under the Regulation, 'demonstrate grounds relating to his or her particular situation'. The Company is not required to comply if the research is necessary for the performance of a task carried out for reasons of public interest.

Notification of a Data Breach

All personal data breaches must be reported immediately to the Company's data protection officer.

If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of Data Subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the data protection officer must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of Data Subjects, the data protection officer must ensure that all affected Data Subjects are informed of the breach directly and without undue delay.

Data breach notifications shall include the following information:

- The categories and approximate number of Data Subjects concerned;
- The categories and approximate number of personal data records concerned;
- The name and contact details of the Company's data protection officer (or other contact point where more information can be obtained);
- The likely consequences of the breach;
- Details of the measures taken, or proposed to be taken, by the Company to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

Data Protection Principles

This Policy aims to ensure compliance with the Regulation. The Regulation sets out the following principles with which any party handling personal data must comply. All personal data must be:

- Processed lawfully, fairly, and in a transparent manner in relation to the data subject;
- Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay;
- Kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the personal data is processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the Regulation in order to safeguard the rights and freedoms of the data subject;
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Lawful, Fair and Transparent Data Processing

The Regulation seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The Regulation states that processing of personal data shall be lawful if at least one of the following applies:

- The data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- Processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract;

- Processing is necessary for compliance with a legal obligation to which the controller is subject;
- Processing is necessary to protect the vital interests of the data subject or of another natural person;
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Our Obligations

The Company shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- All employees, agents, contractors, or other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under the Regulation and under this Policy, and shall be provided with a copy of this Policy;
- Only employees, agents, sub-contractors, or other parties working on behalf of the Company that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Company;
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately trained to do so;
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately supervised;
- The performance of those employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed;
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be bound to do so in accordance with the principles of the Regulation and this Policy by contract;

Amendments

We may update our GDPR Privacy Policy from time to time for legal or regulatory reasons or to allow the proper operation of the Company website. We will make reasonable efforts to notify you of any changes. The changes will apply to the use of the Company website after we have given notice. If you do not wish to accept the new Terms and Conditions you should not continue to use the Company website. If you continue to use the Company website after the date on which the change comes into effect, your use of the Company website indicates your agreement to be bound by the new Terms and Conditions.