



## Privacy Policy

### 1. General

rpc international recruitment Ltd trading as “rpc search and selection”, “rpc foodservice recruitment”, “rpc catering & hospitality recruitment”, “rpc commercial recruitment”, rpc international recruitment”, “rpc interim recruitment” and “rpc consultancy services” collectively known as The rpc Group of Companies (“We”) are committed to protecting and respecting your privacy.

This policy together with our Website Terms of Access and Use and any other documents referred to on it sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.therpcgroup.co.uk](http://www.therpcgroup.co.uk) and registering as a Candidate you are accepting and consenting to the practices described in this policy.

For the purposes of the Data Protection legislation the Data Controller is rpc international recruitment Ltd whose offices are at Bowling Green House, 1 Orchard Place, Southampton, Hampshire SO14 3PX, United Kingdom. Our registration number is Z3275458.

You can contact the Data Controller by writing to us at the above address or sending an email to [admin@therpcgroup.co.uk](mailto:admin@therpcgroup.co.uk)

If you have any questions about this Privacy Policy, please contact the Data Controller.

This Privacy Policy is effective from 3rd May 2018.



## 2. Information we may Collect from You

We may collect and process the following data about you.

### 2.1 Information you give us

You may give us information about yourself by filling in forms ( fields) on our site [www.therpcgroup.co.uk](http://www.therpcgroup.co.uk) (our site) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register as a Candidate to use our site, subscribe to our service by making job applications and when you report a problem with our site.

We collect personal data about you to help in the recruitment process. This data consists of information such as your name, address, e-mail address, and work and education history, plus your nationality which we are required to collect by law. We also collect information in the aggregate to provide us with a better understanding of the users of our web site as a group and to allow us to offer you a better service. However, this aggregate data does not contain personally identifiable information.

### 2.2 Information we Collect About you When you Visit our Website

#### 2.2.1 Web Server Log Information

We use a third-party IT Services provider to host our website. With regard to each of your visits to our site we may automatically collect the following information:

Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call us.

The third-party IT Services provider web servers are in the United Kingdom.

#### 2.2.2 Cookies

This website does use cookies, however the cookies do not store personal information, or any information about the computers being used to access this website. The cookies contain only a generated code value that is used by our Web Server to ensure the security of your data and login.



### 2.2.3 Registering as a Candidate

When you register as a Candidate and create an account on our website we collect the following information: your name, your address (including your house name, street address, town/city, county, country and postcode), your gender, landline and mobile phone numbers and your preferences in terms of mode of communications and which items of matter you would like us to keep you in touch on, and finally your email address and password.

If you do not provide the mandatory information required by the registration form, fields indicated by an asterisk, you will not be able to register and create an account on our website.

### 2.2.4 Job Applications

Whilst you do not have to upload your CV/ Resume to open an account and become a Candidate, if you wish to apply for a vacancy advertised on the site then you must upload your CV / Resume.

Your CV and all personal information provided by you will be made available to our Recruitment Consultants.

If you have applied for a job through rpc international recruitment Ltd, the information you provide will be used to determine your suitability for the position and, if applicable, in determining terms of employment or engagement.

It may also be included in management information used to monitor recruitment initiatives and equal opportunities policies.

If your application is progressed further, details may be disclosed to third parties (such as educational institutions, present and past employers, past colleagues) for reasons such as the verification of, obtaining references, or obtaining extra, information.

Details may also be disclosed if required by law or for the purposes of rpc international recruitment Ltd business requirements (e.g. to auditors or third-party service suppliers).

If your application is unsuccessful, we may try to find you employment with alternative employers and may, therefore, disclose your details to other prospective employers and clients in connection with the recruitment process (which for these purposes includes the process of gaining employment and the ongoing administrative process involved once you have gained employment), unless you tell us otherwise. However, under normal circumstances we will only do this with your explicit consent prior to your details being sent.



### 2.2.5 Newsletter

When you sign up for our e-newsletters to receive latest news items and latest job vacancies via our website we will collect your email address.

## 2.3 Information we Collect When you Contact Us

### 2.3.1. E-mail

When you send an email to the email address displayed on our website, we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature box in your email).

### 2.3.2 Post

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

### 2.3.3 Telephone

When you contact us by telephone, or mobile phone we collect your phone number and any information you provide to us during your conversation with us.

We do not record phone calls but will make notes of the conversation.

### 2.3.4 Contact Us Form

When you contact us using our Contact Us form, we collect the following information: your name, email address, Company Name, Phone Number, Subject Title and any information you include in the message field.

If you do not provide the mandatory information marked by an asterisk you will not be able to submit the Contact Us form and we will not receive your enquiry.

## **3. Information we Receive from Other Sources.**

We may receive information about you if you use any of the internet job boards we subscribe to, other websites we operate or other services we provide.

In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site.

We may also work closely with third parties including, for example, advertising networks, analytics providers, search information providers, and may receive information about you from them.



#### 4. Disclosure of Your Information

We may share your personal information with any member of our group, which means our subsidiaries, our associate companies, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them. who are necessary to run our business or to assist us with running our business and who process your information for us on our behalf. e.g. e mail provider, mailing list provider etc. These providers are all located in the United Kingdom.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

#### Google Inc.

Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service.

Information is shared with Google on an aggregated and anonymized basis. If you wish to find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please go to the partners page of Google's privacy policy.

We may disclose your personal information to other third parties:

- In the event that we intend to sell or intend to buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If rpc international recruitment Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its Candidates and Clients will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Website Terms of Access and Use and other agreements; or to protect our legal rights for example that we have under copyright law or tort law, property, or safety of rpc international recruitment Ltd, our clients or others. This includes exchanging information with other companies and organisations for the purposes of fraud, cyber protection etc



We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve a dispute or as part of any mediation, arbitration or court resolution or similar process.

- If we suspect that criminal or potential criminal conduct has occurred, we will in certain circumstances need to contact an appropriate authority, e.g. the Police.

This could be the case, for instance, if we suspect that a fraud or a cybercrime has been committed or if we receive threats or malicious communications towards us.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

### **Sensitive Personal Data**

We collect and process sensitive personal data only so far as is necessary to ensure we conform with legal requirements, such as equal opportunities legislation. By using this web site and by registering your details with us, you consent to us collecting and processing sensitive personal data supplied by you and disclosing this information to prospective employers in connection with the recruitment process.

Transfer of your Information outside the EEA.

Personal information comprising your CV may be accessed by third parties outside the Economic European Area. This could happen, for example, if you apply for a vacancy where the employer is based outside the EEA. By registering and using the Site, you consent to this transfer.

### **5. Consent**

Under data protection legislation, there are 6 lawful grounds for processing your data. At any one time we can rely on any of the following 4 grounds, the other 2 not being relevant to our business. In some instances more than one may apply at the same time to the processing of your data.

- Having your Consent to collect and process personal data supplied by you and disclosing this information to prospective employers and clients in connection with the recruitment process (which for these purposes includes the process of gaining employment and the ongoing administrative process involved once you have gained employment).



- Processing is necessary for us to meet a legal obligation
- Processing is necessary for the performance of a Contract
- Having legitimate business interests i.e. we are in the business of being an executive, management, technical and commercial recruitment consultancy thereby collecting and processing personal data supplied by you and disclosing this information to prospective employers and clients in connection with the recruitment process (which for these purposes includes the process of gaining employment and the ongoing administrative process involved once you have gained employment).

### 6. Security

rpc international recruitment Ltd takes every precaution to protect your personal information. All personal information entered is protected using industry- standard Secure Layer (SSL) Encryption Technology.

The security of your data is extremely important to us. Access to your personal data is only provided to our staff and third parties who help us to process data, and to prospective and intended employers in order to help with the recruitment process. rpc international recruitment Ltd will not sell, trade or rent your personal information to others.

We will never use your information for any use beyond that stated or the permissions you give us.

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you because of your decision to transmit information to us by such means.

### 7. Retention Periods

#### 7.1 Specific Retention Periods

##### 7.1.1. Your CV / Resume and Registration Details

We will hold your CV/ Resume and your registration details for 8 years from the date that you were last active on our website.



At that point we will contact you and give you the opportunity to remain a registered Candidate of rpc international recruitment Ltd. Should you not wish to remain a registered Candidate or do not respond to our communication then your details will be removed from our database and any hard copy documentation will be securely destroyed.

### 7.1.2 Application Forms and Interview Notes

We will retain these for a minimum of one year because of the time limits in the various discrimination acts

### 7.1.3 Correspondence and enquiries

When you make an enquiry or contact us by email or via our Contact Us form, we will retain your information for as long as it takes to respond to and resolve your enquiry, and for 12 further month(s), after which point we will delete your information.

### 7.1.4. Mailing lists for Newsletters, e-shots etc

We will retain the information you used to sign up for our newsletter and for our e-shots for as long as you wish to remain subscribed or if we decide to cancel sending out newsletters or any of the e-shots whichever occurs first.

## 7.2 Criteria for Determining Retention Periods

For all other circumstances, we will retain your information for no longer than necessary, taking into account the following factors:

- the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
- whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by any relevant law or regulation);
- whether we have any legal basis to continue to process your information (such as your consent);
- how valuable your information is (both now and in the future);
- any relevant agreed industry practices or ICO guidance on how long information should be retained;
- the levels of risk, cost and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- any relevant surrounding circumstances (such as the nature and status of our relationship with you).





## 8. Where we Store Your Personal Data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”).

It may also be processed by staff operating outside the EEA working for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 9. Your Rights

Under data protection law, you have the following rights:

- We have an obligation to provide you “ fair processing information”. This is achieved by us having this Privacy Policy and ensuring it is regularly updated whenever there are changes in data protection law or our own policies and procedures. It is accessible via our website by a link at the bottom of the Home Page of our website. ( Right to be Informed)
- You have the right to see what personal information we hold about you, you are entitled to be given a description of the information, what we use it for, who we might pass it onto, and any information we might have about the source of the information. We are required to provide this information to you within one month of you making the request ( Right of Access )

If you make such a request the process is formally termed “ a Subject Access Request” ( SAR)

See below - Subject Access Request and Verifying your Identity Where you Request Access to your Information



- to request the correction of your information ( Right to Rectification)
- to request the deletion of your information. The right to erasure is not an absolute right. There are exceptions under data protection legislation where an organisation does not have to comply with a right to erasure request. For example, we may be obliged, under the Conduct of Employment Agencies and Employment Businesses Regulations 2003 to hold your data for 12 months after it was last used. (Right to Erasure)
- to request that we restrict our use of your information (Right to Restrict Processing)
- to have that information transferred to another data controller (including a third-party data controller) (Right to Data Portability)
- to object to the processing of your information for certain purposes (Right to Object)

### **Specifically, in relation to profiling and direct marketing.**

You have the right to object to us using or processing your information where we use or process it in order to carry out a task in the public interest or for our legitimate interests, including ‘profiling’ (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes;

You also have the right to ensure that businesses do not make potentially harmful decisions about you based purely on automated decisions (for example whether or not to employ someone). rpc international recruitment Ltd does not use any automated processing in the recruitment process.

Human intervention is at the heart of the way we work . You have the right to express your views, obtain an explanation of any decision and challenge it.

(Right not to be subject to automated decision-making including Profiling)  
and

You have the right to object to us using or processing your information for direct marketing purposes

You may exercise your right to object to us using or processing your information for direct marketing purposes by:

clicking the unsubscribe link contained at the bottom of any marketing e-mail we send you and following the instructions which appear in your browser following your clicking on that link;

or



by sending an email to [admin@therpcgroup.co.uk](mailto:admin@therpcgroup.co.uk) asking that we stop sending you marketing communications or by including the words “UNSUBSCRIBE” or “OPT OUT” in the subject line of the message.

- to withdraw your consent to our use of your information at any time where we rely on your consent to use or process that information. ( Right to Withdraw Consent)

Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

You can exercise any of these rights by writing to rpc international recruitment Ltd, Ground Floor. Bowling Green House, 1 Orchard Place, Southampton, Hampshire SO14 3PX for sending an e-mail to [admin@therpcgroup.co.uk](mailto:admin@therpcgroup.co.uk)

You also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your place of residence or place of work, of an alleged infringement of the General Data Protection Regulation.

For the purposes of the United Kingdom , the supervisory authority is the Information Commissioner’s Office (ICO), whose address is The Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF  
Subject Access Requests ( SAR’s ) and Verifying your Identity where you Request Access to your Information

### Checking of identity

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

We will first check that we have enough information to be sure of your identity. Often, we will have no reason to doubt a person’s identity, for example, if we have regularly been in contact with them. However, if we have good cause to doubt your identity we can ask you to provide any evidence we reasonably need to confirm your identity.

For example, we may ask you for a piece of information held in your records that we would expect you to know: a witnessed copy of your signature or proof of your address.

If the person requesting the information is a relative/representative of the individual themselves they must supply the individual’s consent for the release of their personal data.



If you have been appointed to act for someone under the Mental Capacity Act 2005, you must confirm your capacity to act their behalf and explain how you are entitled to access their information.

Should you make a data subject access request but you are not the data subject, you must stipulate the basis that you consider makes you entitled to the information. The above measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

### **Will we charge a fee?**

No, under data protection law we have no general right to charge you a fee for making a Subject Access Request ( SAR). However, we may charge a “ reasonable fee” based on the actual administrative cost of providing the information when a SAR is manifestly unfounded, excessive or repetitive.

We have a full and separate policy and procedure relating to the way we will handle a Subject Access Request (SAR). Copies are available on request.

### **10. Changes to our Privacy Policy**

Any changes we may make to our Privacy Policy in the future will be posted on this page and if substantial, may be promoted via our website or through e-mail notification.

When we update our Privacy Policy the new version will be given a new effective date which will be stated in Paragraph 1 – General.

Our processing of your information will be governed by the procedures set out in the new version of the Privacy Policy from its effective date onwards.

### **11. Contact**

Any questions, comments and requests regarding this privacy policy are welcomed and should be addressed to :-

rpc international recruitment Ltd whose offices are at Ground Floor, Bowling Green House, 1 Orchard Place, Southampton, Hampshire SO14 3PX, United Kingdom.

Or alternatively e mail us at [admin@therpcgroup.co.uk](mailto:admin@therpcgroup.co.uk)

### **12. Copyright**

This Privacy Policy is protected by copyright. © 2018

All intellectual property rights in this document are reserved.

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