

## **Keltbray Limited, trading as Konstruktive Recruitment.**

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (**GDPR**).

It applies to all temporary and permanent candidates that submit their details to be considered for temporary or permanent work with Keltbray Ltd or our clients.

Keltbray Ltd is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former candidates and applicants. This notice does not form part of any contract to provide services. We may update this notice at any time.

Personal information stored by Keltbray Ltd relating to candidates that are subsequently offered and accepted work with Keltbray Ltd or our clients is dealt with under our Employee, Workers & Contractors Privacy Notice which is available on request.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

### **1. DATA PROTECTION PRINCIPLES**

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

### **2. THE KIND OF INFORMATION WE HOLD ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Information contained in your CV or cover letter or related documents which you supply to us, which may include your date of birth, gender, work history and professional qualifications or memberships.
- Information about our correspondence with you in relation to potential roles

We do not envisage that we will hold any sensitive personal data relating to you.

### **3. HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

We typically collect personal information about candidates through the application and recruitment process, either directly from candidates or sometimes from an employment agency or website (and once a candidate has been assessed in respect of a particular role, their personal information will (unless the candidate indicates otherwise) be retained for consideration in respect of future roles).

We will collect additional personal information relating to your interest in potential roles and availability during the course of our correspondence with you.

### **4. HOW WE WILL USE INFORMATION ABOUT YOU**

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We will only use your personal information when the law allows us to. Most commonly, we will use your personal information where it is necessary for our legitimate interests to identify potential candidates for temporary or permanent roles with us or our clients, and potential roles for you as a candidate, and your interests and fundamental rights do not override those interests, and to comply with our legal obligations.

The situations in which we will process your personal information are listed below.

- Assessing your previous work history, skills and experience
- Making a decision about your suitability for temporary or permanent roles with us or our clients
- Contacting you to discuss your interest in any specific temporary or permanent roles that we believe are suitable for you
- Sending you general marketing emails regarding available roles that may be of interest to you
- Complying with our legal obligations

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

## **5. AUTOMATED DECISION-MAKING**

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

## **6. DATA SHARING**

We will not share your data with third parties without your explicit consent other than as required by law, for example to a regulator.

If we identify that you may be suitable for a temporary or permanent role with one of our clients we will contact you to seek your prior consent to us providing your CV and related information to that client.

All our clients are required to take appropriate security measures to protect your personal information in line with our policies.

We do not anticipate transferring your information outside of the EU.

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **8. DATA RETENTION**

We will retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

The retention period for personal information on our database is usually 3 years from the date you were put onto the database or from when you last accepted a temporary or permanent role with us or our clients (if longer), unless you otherwise inform us that you wish for your data to be retained for a longer period.

## 9. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request the erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the DPO in writing.

### No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## 10. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the DPO. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## 11. DATA PROTECTION OFFICER

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO by telephone on 0207 643 1038 or by email at [GDPR@keltbray.com](mailto:GDPR@keltbray.com). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

## 12. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

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