

Lavender & Sage Recruitment and HR Co. Customer Privacy Notice

Registered name: Lavender & Sage Recruitment and HR Co.

We are the controller of your personal data. For more information on controllers and their responsibilities, please see our guidance on <u>data protection principles</u>, <u>definitions</u>, <u>and key</u> <u>terms</u>.

This privacy notice tells you what to expect us to do with your personal information.

- <u>Contact details</u>
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

Contact details Telephone 07805929712 Email nikki@lavenderandsagetalent.com

What information we collect, use, and why

We collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Profile information
- Marketing preferences

We also collect or use the following special category information for **information updates or marketing purposes.** This information is subject to additional protection due to its sensitive nature:

• Genetic information

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information
- Any other personal information required to comply with legal obligations



We also collect or use the following special category information to **comply with legal requirements.** This information is subject to additional protection due to its sensitive nature:

• Genetic information

We collect or use the following personal information for **recruitment purposes**:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)

We also collect or use the following special category information for **recruitment purposes.** This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Genetic information
- Health information

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible <u>lawful bases</u> in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

• Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.

• Your right to rectification - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. <u>Read more about the right to rectification</u>.

• Your right to erasure - You have the right to ask us to delete your personal information. <u>Read more about the right to erasure</u>.



• Your right to restriction of processing - You have the right to ask us to limit how we can use your personal information. <u>Read more about the right to restriction of processing</u>.

• Your right to object to processing - You have the right to object to the processing of your personal data. <u>Read more about the right to object to processing</u>.

• Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. <u>Read more about the right to data portability</u>.

• Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent at any time. <u>Read more about the right to withdraw consent</u>.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

• Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

• We process limited personal information under the lawful basis of legitimate interests, as defined in the UK General Data Protection Regulation (UK GDPR). This includes processing personal data to provide individuals with relevant updates about current job opportunities, changes to our services, or tailored offers that may support their career development or hiring needs. Additionally, we may share minimal personal data, typically limited to first names, of potential candidates with prospective employers at the early interview stage. This is essential to enable meaningful introductions and assess mutual suitability before progressing further in the recruitment process. We believe this use of personal data is necessary and proportionate to support individuals in their professional development and to assist clients in making informed recruitment decisions. The processing provides clear benefits by ensuring timely, targeted communication and a streamlined hiring experience for all parties. We carefully consider the potential impact on individuals and apply safeguards to protect their rights and interests. We do not use personal data in ways that are unexpected or intrusive, and individuals have the right to object to this processing at any time.



For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

• Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

• We process limited personal information under the lawful basis of legitimate interests, as defined in the UK General Data Protection Regulation (UK GDPR). This includes processing personal data to provide individuals with relevant updates about current job opportunities, changes to our services, or tailored offers that may support their career development or hiring needs. Additionally, we may share minimal personal data, typically limited to first names, of potential candidates with prospective employers at the early interview stage. This is essential to enable meaningful introductions and assess mutual suitability before progressing further in the recruitment process. We believe this use of personal data is necessary and proportionate to support individuals in their professional development and to assist clients in making informed recruitment decisions. The processing provides clear benefits by ensuring timely, targeted communication and a streamlined hiring experience for all parties. We carefully consider the potential impact on individuals and apply safeguards to protect their rights and interests. We do not use personal data in ways that are unexpected or intrusive, and individuals have the right to object to this processing at any time.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

• Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Where we get personal information from

• Directly from you

How long we keep information

We retain personal data for up to 18 months from the last meaningful interaction to ensure we can provide relevant job opportunities and services. We review our records regularly and securely delete data that is no longer necessary.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.



We retain personal information only for as long as necessary to fulfil the purposes for which it was collected, in line with our legitimate interests and legal obligations.

- Candidate and client data (including CVs, contact details, and correspondence) is kept for up to **18 months** from the date of your last meaningful interaction with us. This allows us to keep you informed of relevant opportunities, updates, or services while ensuring data is not held longer than necessary.
- After 18 months of inactivity, we will securely delete or anonymise your personal information, unless we are legally required to retain it for longer (e.g. for accounting or compliance reasons).
- If you are placed in a role through our services, some data may be retained for up to **6 years** to meet contractual, legal or HMRC requirements. This includes placement details, invoicing records, and compliance documentation.

You can ask us to update or delete your data at any time by contacting us using the details in the "Contact Us" section of this notice.

Who we share information with

Others we share personal information with

- Organisations we're legally obliged to share personal information with
- Third parties:
- We only share personal information with third parties when it is necessary and appropriate to do so, and always in line with our legal obligations and your rights.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113 Website: <u>https://www.ico.org.uk/make-a-complaint</u>