

THINK LEGAL RECRUITMENT – PRIVACY POLICY – ONLINE AND GENERAL USE

As a business, we are committed to ensuring privacy to all those that use our website as well as to those that provide personal data to us in the course of our business as a recruitment agency. The provisions of GDPR also provide that we must adhere to certain regulations which have been enacted to ensure that any personal data you provide to us is safeguarded and utilised with due care and attention.

This privacy policy sets out the kind of data that we collect and what we do with your personal data whether we are in the process of helping you find a job, maintaining an ongoing relationship with you once we have found you a job, providing you with a service, receiving a service from you or visiting our website. We, means Think Legal Recruitment Limited.

This Privacy Policy applies to the personal data of our website, users of our website, candidates, clients and suppliers.

If you are in any doubt as to what this means then you may speak to one of the Directors (email on info@thinklegalrecruitment.com). If you are unhappy or otherwise do not agree to the processing of your data in the way in which described below please do not submit any personal data to us. If you have already submitted data to us then please see below regarding "opting out".

WHAT KIND OF DATA DO WE COLLECT

As a recruitment agency it is inherent in our business that it will be necessary to collect personal data from you in order to provide our recruitment services.

Candidate Data

In order to provide a tailored service to you it is necessary to process certain information about you.

The data we hold in relation to you can include (but not limited to):

- Your name, home address, email address and mobile telephone number
- Work and Education history (such as you provide in your CV)
- Salary and Bonus information
- Your nationality and Visa status (if applicable) or proof of your right to work in the UK
- Email, texts and notes pertaining to ongoing dialogue we may have as part of the recruitment process

Client Data

If you are a customer of Think Legal then we need to collect and use information about you, or individuals at your organisation, in the course of providing our service to you, namely, finding candidates who are the right fit for your organisation.

The data we hold in relation to you is likely to include:

- Names, emails, contact numbers (including mobile telephone numbers) of individual contacts at your organisation.
- Emails, texts and note pertaining to ongoing dialogue we may have as part of the recruitment process.

Supplier Data

We need a small amount of data from our suppliers to ensure that our relationship runs smoothly. We will need to maintain contact details for individuals at your organisation in order that we are able to contact you. That is likely to include contact names, emails, address and telephone numbers alongside emails sent and received in the course of our dealings. We will also maintain your bank details in order that we may pay you for services provided to us.

HOW WE COLLECT YOUR DATA

Candidate Data

The personal data we collect will have been provided, or will be provided by you or a third party who we work with, such as a Job Board Company or Linked in.

Other means by which your data may be provided can include:

- You provide your CV and/or data directly to us by email;
- You apply via a third-party website to one of our adverts which in turn is forwarded to us;
- You apply directly to job advert on our website;
- Entering a competition or prize draw at one of our events;
- Your CV and/or data is obtained from a third party such as a job board or Linked In.

Some of the above information we are required to collect by law and others can be by necessary contractual requirements that we have with the law firms to whom we provide recruitment services to.

Whilst to a more limited degree, we may also collect information in the aggregate to provide a general analysis of the users of our website. Such information is collated for internal use and is done as a group and does not contain personally identifiable information.

Client Data

We collect personal data from you in a number of ways including:

- Personal data provided by you directly – this can come from direct dialogue by email or telephone or in face to face meetings whether following an approach from you to us or as a result of business development efforts on the part of our consultants/employees;
- Personal data that we collect from publicly available sources such as your own website and from news sources;

HOW WE USE YOUR PERSONAL DATA

Candidate Data

The personal data that we hold will be stored, processed, used and disclosed by us for the following purposes:

- To provide our recruitment services to you.
- To enable you to send your CV to us whether to apply for specific jobs (either through our own website or via third party sites such as The Lawyer, Simply Law or Linked in) or to discuss your more general recruitment requirements and employment preferences.
- To maintain an ongoing business relationship with you in the provision of our recruitment services whether a candidate or general user of our website.
- To allow us to provide suitable job opportunities to you, to match your information to suitable job vacancies with the aim of finding a suitable position for you.
- To keep you informed of new and future job opportunities that might arise and relevant to you.
- To enable us to answer any enquiries you might have
- To fulfil any contractual obligations with our clients (law firms)

Both prior to and subsequent to the implementation of GDPR it has always remained the policy of the business to only share candidate's personal information with a client where express consent has been given.

In simple terms that will usually be by the provision of a copy of your CV. That will usually require us to disclose your name, current title, current salary, notice period as well as the content you have outlined in your CV sent to us. In certain instances, under the contractual relationships we have with clients, it may be necessary to provide your contact details such as email, phone number and home address together with confirmation of your eligibility to work in the UK.

Client Data

The personal data that we hold will be stored, processed, used and disclosed by us for the sole purpose of providing recruitment services to you, in essence providing suitable candidates for jobs within your organisation.

We have identified below the various ways in which we use your data to facilitate this:

- Storing your details on our database so that we can contact you about recruitment activities;
- Keeping records of our meetings and conversations so that we can tailor our service to your needs and provide suitable candidates.

THE LEGAL BASIS ON WHICH WE HOLD YOUR DATA

In each of the instances of Candidate, Client or Supplier data we have determined that Article 6 (1)(f) of GDPR forms the lawful basis on which we may hold and process your data. This provides that we may process your data where it *"is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of you which require protection of personal data"*.

We do not believe that the processing of your data in the manner we have identified above (and below) prejudices any of the parties for whom we hold data but rather allows us to provide a bespoke service to all parties.

You do have the right to object to us processing your personal data and can do this at any time (for which see "opting out" below).

Candidate Data

We believe that it is reasonable to expect that if you are looking for employment or have posted your CV information to a job board or professional networking site, that you are happy for us to collect and otherwise use your personal data to offer or provide our recruitment services to you, share that information (with your express consent) to prospective employers as well as assess your skills and suitability for any roles or prospective vacancies we may have.

As you progress through a recruitment process and it looks like you might secure the role (or may be under offer) it may be necessary for us to share certain personal information with a prospective employer in order that they may prepare contractual documentation and/or undertake reference and employment checks as part of their due diligence process. These are all things we need to do in order to perform as a business. We will always seek your consent to the submission of any such information.

We want to be able to provide you with a bespoke recruitment service and be able to tell you about suitable and relevant job vacancies. We therefore think it is reasonable to process your data in order to be able to send you the most appropriate content.

Client Data

In order to provide the best service possible, we store your personal data and/or the personal data of individual contacts at your organisation in addition to keeping a record of our conversations, meetings, ongoing jobs and placements within your organisation. We consider these uses of your data to be necessary for our legitimate interests as a business in providing recruitment services to you.

Supplier Data

We use and store personal data of individuals within your organisation in order for the ongoing provision of services by you to us. We also hold your financial details so that we can pay for your

services. We consider this to be necessary for our legitimate interests as a recipient of your services.

WHO DO WE SHARE YOUR DATA WITH

Candidate Data

Where appropriate and in accordance with UK laws and requirements we may share your personal data in a number of ways and for various reasons, with the following general categories of people:

- Potential Employers (and only with your express consent);
- Tax, audit or other authorities when we believe in good faith that there is a legal requirement upon us to share such data;
- Third Party Service providers who perform functions on our behalf (and for whom suitable safeguards are in place);
- Third Party IT outsourced providers where we have an appropriate processing agreement (or suitable protections) in place.

Client Data

We will share your personal data in order to ensure that we provide you with a suitable pool of candidates to fulfil your recruiting requirements.

We may share your data with the following general categories of people:

- Candidates for the purposes of conveying information around suitable vacancies as well as facilitating interviews and meetings;
- Tax, audit or other authorities when we believe in good faith that there is a legal requirement upon us to share such data;
- Third Party Service providers who perform functions on our behalf;
- Third Party IT outsourced providers where we have an appropriate processing agreement (or suitable protections) in place.

HOW DO WE PROTECT YOUR DATA

We are committed to protecting your information. We have put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data. These represent a range of technical and organisational processes alongside ongoing training of our personnel to ensure they adhere to such safeguards.

Any third-party providers that we work with who might handle your data such as our outsourced third-party data base provider and the likes of Microsoft, are equally committed to the safeguarding and protection of your data as well as committed to compliance and conformity to GDPR.

If you suspect any misuse or loss of your personal data please let us know straightaway and contact us at info@thinklegalrecruitment.com. Additional contact information can be found here - <https://www.thinklegalrecruitment.com/contactus/>

HOW LONG DO WE HOLD YOUR DATA

The GDPR does not specify a timeframe for which personal information might be held. It is the aim of Think Legal to play an ongoing role in a candidates' career and so we have determined that it is appropriate to maintain personal data for a period of 3 years from the date we have provided you initial notice of this privacy notice.

If we have not had any meaningful contact with you for 3 years we will delete your personal data from our systems unless we believe in good faith that the law or other regulations require us to preserve that data.

YOUR RIGHTS AND OPTING OUT

Even if we already hold your personal data you still have rights some of which are outlined below. As a general rule, if you no longer wish us to have or otherwise store your data then our policy is simply to delete your data from our systems. We will seek to deal with your request without undue delay and in any event within 30 days from the date of your request.

If you no longer wish us to hold and store your data then please email us at info@thinklegalrecruitment.com

Right to Object

As we are holding your personal data on the basis of our legitimate interest you have the right to object to our doing so. Save in the event of a legal obligation upon us to hold that information, on receipt of such objection we will endeavour to delete your personal data without unnecessary delay and in any event within 30 days.

Right to Withdraw Consent

Whilst we do not currently engage in direct marketing if we have relied upon your express consent as a ground to hold and process your data, you have the right to withdraw your consent at any time.

Data Subject Access Request

You have the right to request a copy of the information we hold for you on our systems. In order to process your request, we will need verification of your identity. Please note that we will not provide the following types of information in response to a data access request:

- Information about other people;
- Opinions given in confidence;
- Repeat request or privileged information;
- Other information that may be exempt under data protection laws

Right to Erasure

In certain situations, you have the right to request us to delete your personal data. We will endeavour to do so within 30 days of receiving your request. We will delete your data but will assume that you would prefer us to keep a note of your name on a register of individuals who would prefer not to be contacted. We do so in order to minimise the chances of you being contacted in the future where your data might be collected in unconnected circumstances. If you would prefer us not to do this please let us know.

Right of Data Portability

If you wish, you have the right to transfer your data from us to another data controller. Where we can we will seek to help with this either by transferring your data for you, or by providing a copy in a commonly used machine-readable format.

Right to lodge a complaint with a Supervisory Authority

You have a right to lodge a complaint with your local supervisory authority via the Information Commissioner's Office (ICO).

HOW WE STORE AND TRANSFER YOUR DATA INTERNATIONALLY

Whilst the business operates within the UK only, the business utilises third party suppliers who support the business in managing and processing your data (such as Microsoft in the provision of email & word services as well as our third-party database provider). Some of those suppliers operate both within the UK and internationally (within Europe and the United States) via cloud based storage platforms.

We want to make sure your data is stored and transferred in a way which is secure. We will therefore only transfer data outside of the European Economic Area (EEA) i.e. the EU member states where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data. For example:

- By way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in the jurisdictions without adequate data protection laws; or
- By signing up to the EU-US Privacy Shield Framework for the transfer of personal data from entities within the EU to entities in the United States or America or any equivalent agreement in respect of other jurisdictions