



CRESSIDA CONSULTING

Cressida Consulting GDPR Privacy Policy

Company Name:	Cressida Consulting Ltd
Companies House Number:	13096445
Company Address and Contact Details:	Bollin House Bollin Link, Wilmslow, Cheshire, United Kingdom, SK9 1DP privacy@cressidaconsulting.com
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Introduction

Cressida Consulting Ltd 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.

Cressida Consulting is located in Manchester (UK) and therefore the lead supervisory authority for all our GDPR related decision making is the UK Information Commissioners Office (www.ico.org.uk).

Cressida Consulting Ltd's GDPR Privacy Notice describes your rights and how the GDPR and the current e-Privacy Directive (PECR) apply to the way the Company handle your personal data. Our aim is to be responsible, relevant and secure with your information.

We encourage you to read through our Privacy Notice so you understand what information we collect about you, who we share it with and how your data could be used.

Who controls your personal data?

The Data Controller is Cressida Consulting Ltd, registered in England (Company No. 13096445)

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003.

Cressida Consulting Ltd is registered as a Data Controller with the ICO, registration reference: ZA870148

Any questions regarding this Privacy Notice and our privacy practices should be sent by email to privacy@cressidaconsulting.com or by post to our registered company address: Bollin House, Bollin Link, Wilmslow, Cheshire, United Kingdom, SK9 1DP.

What do we do?

As a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003, we collect the personal data of the following types of people to allow us to undertake our business;

- Prospective and placed Candidates for permanent or contract roles;
- Prospective and live Client contacts;
- Supplier contacts to support our services;
- Employees, independent consultants, temporary workers;

What are the lawful bases and purposes of the processing?

Legitimate Interest

As 'Data Controller' Cressida Consulting Ltd relies on 'legitimate interest' as the lawful basis upon which we collect & retain your personal data. This is defined by Article 6(1)(f) of the General Data Protection Regulation as:

"...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 interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child."

A wide range of interests may be considered as legitimate interests. They can be our own interests or the interests of third parties, commercial interests, as well as wider societal benefits. Our legitimate interest in collecting and retaining your personal data is described below:

As a recruitment business and recruitment agency we introduce Candidates to Clients for permanent employment or fixed term contracts. The exchange of personal data of our Candidates and our Client contacts is a fundamental, essential part of this process.

In order to support our Candidates' employment needs and our Clients' resourcing needs we require a database of Candidate and Client personal data containing historical information as well as current resourcing requirements. To maintain, expand and develop our business we need to record the personal data of prospective Candidates and Client contacts.

As a recruitment agency, Cressida Consulting Ltd has a legitimate commercial interest to collect and process personal data relating to active and passive jobseekers (candidates) as well as the collection of personal data relating to Hiring Managers of organisations we provide recruitment services to; or Hiring Managers of organisations we would engage with to offer our services (these can be defined as live & prospective Clients). Organisations that use our services to fill their vacancies would be considered as third parties, though Cressida Consulting Ltd has a legitimate interest in sharing Candidate personal data with these organisations as part of its recruitment services.

In order to provide permanent and contract recruitment services, it is necessary for Cressida Consulting Ltd to process certain types of personal data. The personal data we collect is only used only for the purpose of providing recruitment services. In particular, we use your data to deliver our recruitment services by:

- Identifying & selecting candidates whose skills and/or experience are appropriate for the vacancies and contract assignments detailed to us by our Clients;
- Notifying candidates of potentially suitable and appropriate permanent jobs or contract assignments;
- Notifying hiring managers of the availability of suitably skilled workers (Candidates).

As a Candidate your data may also be used for:

- Assisting our clients to identify and select suitable candidates for interview on permanent vacancies and contract assignments;
- Processing of pre-employment screenings;
- Internal management purposes: Cressida Consulting Ltd quality control and reviews to ensure the service that we offer is appropriate and targeted at the right audience.

If we provide recruitment services to you, as a Candidate or Client, we will also need to ensure compliance with relevant laws and regulations in the jurisdictions that we operate. As we provide recruitment services to our Clients (who may be the organisations subject to the above laws and regulation), we may need to process candidate personal data to meet contractual obligations with our Clients, but we will always obtain further consent from a Candidate where required by law.

Consent

Should we want or need to rely on consent to lawfully process your data Cressida Consulting Ltd will request your consent verbally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

Marketing Communication & e-Privacy (PECR)

To comply with the e-Privacy Directive (PECR) you have the right to opt-out of this service at any time by emailing: unsubscribe@cressidaconsulting.com

Cressida Consulting Ltd does not share your personal data with third parties for marketing purposes.

What personal data does Cressida Consulting collect?

We collect and process personal information to enable us to provide advice and professional services as an employment agency and employment business. This information may include:

- personal contact details;
- family details;
- links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, corporate websites;
- education and employment details.

We only collect personal information necessary for the best performance of our services and/or to improve our services, or to be able to fulfil specific requests & requirements from our Candidates and Clients.

Upon registration as a Candidate we may ask for your:

- full name & contact details (telephone, mobile & email);
- location / home address;
- your most recent Curriculum Vitae (CV);
- links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, corporate website;
- relevant educational, industry qualifications and employer references (diplomas, courses and certifications);
- your availability & proof of the right to work in your country or countries of residence & choice.

When placing you in a role at one of our Clients we might request additional personal information such as:

- Nationality;
- National Insurance / Social Security Number;
- Passport or Identity Card;
- Employer references.

and if you are an independent Contractor, personal business documents such as:

- Company registration certificate;
- Insurance documentation;
- VAT registration details.

Additional types of data we collect

Technical Data: includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Profile Data includes your username and password, your interests, preferences, feedback and survey responses.

Usage Data includes information about how you use our website, products and services.

Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

We may also need to collect sensitive personal data to provide our service but we will only do so with your explicit consent or where there is a lawful requirement to do so. By sensitive data we mean

information such as criminal record checks, memberships of industry bodies or trade unions, racial or ethnic origins, physical or mental health details. This data will be stored securely, deleted when no longer needed and will never be used to discriminate against you.

As a Candidate your personal data will only be used by Cressida Consulting Ltd in order that we can provide recruitment agency services. With your consent, your data will be shared with third parties, specifically - prospective employers, who might be interested in your availability as an appropriately skilled worker. However, it is standard practice for Cressida Consulting Ltd to remove personal information such as home address and contact details from your CV before it is provided to our clients. Your personal data will not be used for any purpose other than the provision of our recruitment services.

As a Hiring Manager within a prospective or current client we will collect personal data such as your:

- Name, job title and business contact details (telephone, mobile and email);
- Your place of work (company name), plus the location or business address;
- links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, corporate website.

As a Hiring Manager your personal data will not be shared with any other parties outside of Cressida Consulting Ltd or be used for any purpose other than the provision of our recruitment services.

Information we obtain from other sources.

This is information we obtain about you from other sources such as LinkedIn, social media profiles, corporate websites, job board websites, online CV libraries, data aggregators or personal recommendations. In this case we will inform you of the fact we hold personal data about you, the source the personal data originates from and for what purpose we intend to retain and process your personal data, when the first communication takes place.

From your current employer: where you are employed by an umbrella/payroll company or personal service company. It is important to note that in these circumstances, when you are engaged through such a company, we will be relying on your employer to ensure they have established a legal basis for processing your data with you. Our basis for the ongoing processing of your data will become subject to a contract between us and that company.

Website Users: When you visit our website there is certain information that we may automatically collect, whether or not you decide to use our services. This includes your IP address, the date and the times and frequency with which you access the website and the way you browse its content. We will also collect data from you when you contact us via the website.

We collect your data automatically via cookies, in line with cookie settings in your browser. If you are also a Candidate or Client of Cressida Consulting Ltd, we may use data from your use of our websites to enhance other aspects of our communications with or service to you. See below if you would like to find out more about cookies, including how we use them and what choices are available to you.

Cookies

A "cookie" is a piece of information that is stored on your device which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.

Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

We use cookies to do two things:

- to track your use of our website. This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website and services in response to what our visitors want and need; and
- to help us advertise jobs to you that we think you'll be interested in. Hopefully this means less time for you trawling through endless pages and will get you to the relevant information you want more quickly.

Cookies are either:

- **Session cookies:** these are only stored on your device during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your device; or
- **Persistent cookies:** a persistent cookie is stored as a file on your device and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics and for personalisation (see below).

Cookies can also be categorised as follows:

- **Strictly necessary cookies:** These cookies are essential to enable you to use the website effectively, such as when applying for a job, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
- **Performance cookies:** These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.
- **Functionality cookies:** These cookies allow our website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.
- **Personalisation cookies:** These cookies help us to advertise details of potential job opportunities that we think may be of interest. These cookies are persistent (for as long as you are registered with us) and mean that when you log in or return to the website, you may see advertising for jobs that are similar to jobs that you have previously browsed.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

COOKIE	NAME	PURPOSE	MORE INFORMATION
Google Analytics	_utma _utmb _utmc _utmz	These cookies collect information in an anonymous form, including the number of visitors to the	Click here for an overview about Privacy at Google

		<p>site, where visitors have come to the site from and the pages they visited. These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site</p>	
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How we store your personal information

To provide the best service to meet your employment or recruitment needs, your personal information will be securely stored in our CRM provided by Vincere and accessed by Cressida Consulting Ltd employees.

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests. Cressida Consulting Ltd will retain your personal data for 5 years from the date of the last communication with you (email, telephone or otherwise). This is determined on the basis that 5 years is considered to be the average length of time individuals and Hiring Managers are employed within the industry sectors and organisations we deal with and many Candidates can remain 'dormant' for long periods of time, only to become 'actively looking' when approached by Cressida Consulting Ltd with a relevant job opportunity. If there have been no active communications for a period of 5 years or more, your details will be deleted.

For candidates who are 'engaged under contracts for services' with our clients, in order to comply with the requirement of financial laws in the jurisdictions that we operate, we will hold your personal data for a minimum of 7 years.

We will delete your personal data from our records once the relevant retention period is reached, or when we are in receipt of a data subject request to do so (if not overridden by lawful requirements). We may archive part or all of your personal data or retain it for our financial records only, deleting all or part of it from our main database system.

For the purposes of creating an 'opt out' or 'erasure' suppression file we may minimise the amount of data we hold down to your name and email address. This will ensure that we do not re-enter your personal data on to our database or communicate with you again but you also have the right to object to this.

If your personal information or circumstances change, you can correct, update or request to remove your personal data by emailing: privacy@cressidaconsulting.com

What are your rights?

Whilst the processing of your personal data is necessary for the completion of our employment agency services and our legitimate commercial interests, under Article 6 of the GDPR, we have obligations to you the Data Subject.

You retain the following rights to have your personal data processed fairly, lawfully and proportionately to the services that we provide. Specifically, Cressida Consulting Ltd confirms your individual rights as follows:

- The right to be informed – that we have collected and are processing your data;
- The right of access - gives you the right to access information held about you;

- The right to rectification - this enables you to have any incomplete or inaccurate information we hold about you corrected;
- The right to restrict processing - 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;
- The right to object – to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for marketing purposes;
- The right to erasure - 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 delete or remove your personal information where you have exercised your right to object to processing.
- The right to request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

How to complain

If you have any concerns, questions or complaints about our use of personal information, then please email: privacy@cressidaconsulting.com or write to us at

Cressida Consulting Ltd
Bollin House Bollin Link
Wilmslow
Cheshire
United Kingdom
SK9 1DP

You can also complain to the ICO if you are unhappy with how we have used your data.

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

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>