

<b>Company Name:</b>	Synergy CRS Ltd ('the Company')
<b>Company Contact details:</b>	Data Protection Officer TEL 0333 800 1484 E-Mail <a href="mailto:gdpr@synergycrs.co.uk">gdpr@synergycrs.co.uk</a>
<b>Document DP5A</b>	Privacy Notice
<b>Topic:</b>	Data protection
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The Company 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) you have provided on the Company website for the purposes of providing you with services and /or information. In doing so, the Company acts as a data controller and will only use your personal data in accordance with the terms of the following statement.

**This statement sets out below:**

- A. How the Company collects your personally identifiable information through the website
- B. How the Company uses this information.
- C. How long the Company can retain your information.
- D. Who the Company may share the information with and for what purpose(s).
- E. What rights/choices are available to you regarding collection, use and distribution of your information.
- F. How you can correct any inaccuracies in the information collected through the website.
- G. The kind of security procedures that are in place to protect the loss, misuse or alteration of information collected through the Company's website
- I. How to raise a Complaint

**If you feel that this company is not abiding by its posted privacy policy, you should first contact our *Data Protection Officer* on [gdpr@synergycrs.co.uk](mailto:gdpr@synergycrs.co.uk)**

**1. Collection and use of personal data**

**a. Purpose of processing and legal basis**

The Company collects information from our users at several different points on our website. The Company is the sole owner of the information collected on this site. We will not sell, share, or rent this information to others except where necessary to facilitate a registering, workers pay, manage the company and workers compliance or when requested from relevant or assignment related clients or authorities. The legal bases we rely upon to offer these services to you are: Legitimate Interest, Consent, Legal Obligation, Contractual requirement.

**b. Legitimate interest**

The Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Processing your information is necessary for the starting process of the assignment therefore your data is taken during the registration
- Processing your information is necessary for compliance with a legal obligation to which the company is subject with its clients

**c. Recipient/s of data**

Your personal data is stored on our servers which are in the European Economic Area. If we share your personal data with any third party service provider in the course of providing you with our services, those third parties are required to process your data in accordance with contracts which comply with data protection legislation.

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Clients
- Your Employer
- Disclosure and Barring Service via Care Check (if a DBS Check is required)
- DVLA/DVA (if a licence check is required)

**d. contractual requirement**

Your personal data is required by law and/or a contractual requirement (e.g. our client may require this personal data), and/or a requirement necessary to enter into an assignment with our clients

You are obliged to provide the personal data and if you do not the consequences of failure to provide the data are:

- We will be unable to further your registration process.
- Client may refuse to offer you the assignment on the basis of non compliance with their individual client requirements

**e. Registration**

We request information from you on our online registration forms. Here you must provide contact information and information regarding the type of work you are seeking and your skills, qualifications and experience. This information is used to enable us to provide you with work-finding services. If we have trouble processing your registration, this contact information is used to get in touch with you.

You are solely responsible for any information submitted to this website and you must ensure the information provided is true, accurate and up to date and not misleading.

**f. Cookies**

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

**g. Log Files**

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

## **2. Data retention**

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time. The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services. We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation. Where the Company has obtained your consent to process your personal and sensitive personal data, we will do so in line with our retention policy (a copy of which is attached). Upon expiry of that period the Company will seek

further consent from you. Where consent is not granted the Company will cease to process your personal data and sensitive personal data.

### 3. Your rights

**Please be aware that you have the following data protection rights:**

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by logging back onto your account using your username and password and fill out an Update Personal Details and Communication Form on the synergy website by logging in to your account.

### 4. Notification of changes

#### a. Correct/Erase Personal Information

If your personally identifiable information changes (such as office address), we will endeavour to provide a way to correct, update or remove the personal data provided to us. This can be done by logging into your personal account and submit a Update Personal Details and Communication Preferences form.

If you were registered with Synergy CRSC before July 2017, please email our Data Protection Officer for further information on [gdpr@synergycrs.co.uk](mailto:gdpr@synergycrs.co.uk)

#### b. Notification of Policy Changes

If we decide to change our privacy policy, we will post those changes on our Homepage so our users are always aware of what information we collect, how we use it, and under circumstances, if any, we disclose it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users by way of an email. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy under which the information was collected. These terms and conditions may be changed by us at any time. You will be deemed to accept the terms and conditions (as amended) when you next use the Website following any amendment.

#### c. How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you: by email [gdpr@synergycrs.co.uk](mailto:gdpr@synergycrs.co.uk).

### 5. Sharing Information

#### a. Overseas Transfers

The Company may transfer the information you provide to countries outside the European Economic Area ("EEA") that do not have similar protections in place regarding your data and restrictions on its use as set out in this policy. However, we will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein. By submitting your information you consent to these transfers for the purposes specified above.

**a. Sale of business**

If the Company's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

**b. Links**

This website contains links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. We encourage you to be aware of this when you leave our site and to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Company's website.

**6. Protecting your information**

**a. Security**

The Company takes every precaution to protect our users' information. Only employees who need the information to perform a specific job (for example, our accounts clerk or a marketing assistant) are granted access to your information. The Company uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of the Internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.

**If you have any questions about the security at our website, you can send an email [gdpr@synergycrs.co.uk](mailto:gdpr@synergycrs.co.uk)**

**b. Security and Passwords**

In order to register with the Website and to sign in when you visit the Website, you will need to use a username and password. You are solely responsible for the security and proper use of your password, which should be kept confidential at all times and not disclosed to any other person. You must notify us immediately if you believe that your password is known to someone else or if it may be used in an unauthorised way. We accept no liability for any unauthorised or improper use or disclosure of any password.

**c. Content Rights**

The rights in material on the Website are protected by copyright, software and trademark laws and you agree to use the Website in a way which does not infringe these rights. You may copy material on the Website for your own private or domestic purposes, but no copying for any commercial or business use is permitted.

**7. Complaints or queries**

The Company tries to meet the highest standards when collecting and using personal information. We take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

**If you feel that this company is not abiding by its posted privacy policy, you should first contact our Data Protection Officer, Patricia Szaszova on [gdpr@synergycrs.co.uk](mailto:gdpr@synergycrs.co.uk)**

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.