

# Privacy Notice

The privacy of your data is important to us. Our Privacy Notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the data protection legislation (including but not limited to the General Data Protection Regulation (GDPR (Regulation (EEA) 2016/679) (the "GDPR")). It applies to all clients, candidates, employees, workers, contractors' suppliers, referees and individuals utilising the services of Eden Scott, including website users.

## Who are Eden Scott Ltd

Eden Scott is a Recruitment Business delivering recruitment solutions specialising in professional, technical and executive markets across permanent, contract and temporary roles. We work within specialist market areas and have offices in 4 locations, Edinburgh, Glasgow, Aberdeen and Belfast.

This policy may be subject to change and material changes were made most recently on 30 January 2018. Your continued use of our website indicates your consent to any changes we make to this policy but please continue to visit this page to view any updates.

If you have any queries regarding this policy please email [lindsey.boxall@edenscott.com](mailto:lindsey.boxall@edenscott.com) or write to Lindsey Boxall, Eden Scott, 26 St Andrew Square, Edinburgh, EH2 1AF

To ensure we comply with our legal obligations we have detailed the following:

- Information processed
- What categories of personal data we collect
- Purpose of the processing
- The legal basis for the processing
- Recipient or categories of recipients of the personal data
- Retention period for data
- Details of transfers to third country and safeguards
- Data subjects rights
- Right to withdraw consent at any time

- The right to lodge a complaint
- Consent

## What information is processed?

Eden Scott Ltd is a "Data Controller" and "Data Processor". This means that we are accountable 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.

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

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

We collect data from people who apply for employment with Eden Scott or people who register to use our services via the website, application forms, submitting a C.V., telephone or by contacting the business directly in order that we can provide a recruitment service as outlined above and in accordance with our client's instructions.

We will only use your personal information where there are lawful reasons to do so. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

## What data do we collect, the purpose, why we collect it, the level of access and retention of my data?

We have outlined how we will collect, store and use personal information about you in the relevant links provided below. These links provide detailed information on what categories we collect, the purpose of the processing, recipients of the personal data, who has access and the retention periods.

Generally, we keep personal data in accordance with our internal retention procedures, which are determined in accordance with our statutory obligations and good practice. These retention periods depend on the nature of the information (for example, we apply different retention periods to our employee's information as opposed to information on our applicants), and are subject to change.

The data sets we collect include

- Permanent candidate data
- Temporary/Interim candidate data
- Client data
- Employee, worker, contractor data
- Referees

(For details refer to our website [www.edenscott.com/privacy-notice](http://www.edenscott.com/privacy-notice))

## What is sensitive personal information?

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information (outlined above). We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- In order to perform pre-employment background checks, such as financial history, criminal history as requested by our clients

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

## Who do you share my data with?

We will share your personal information with third parties: where lawfully required to do so; where it is necessary to administer the working relationship with you or, where we have another legitimate interest in doing so.

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers: Pension Administration, Benefits Provision, Screening providers, IT Services, Legal Services.

All our third-party service providers [and other entities in the group] are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

## Do you transfer my data outside of the EEA?

In order to perform our services to you, it may be required to transfer your data outside of the EEA the reasons of which are outlined below:-

Background screening checks – if you have worked out with the EU.

Overseas recruitment – some of our divisions recruit for organisations out with the EEA.

Software providers – we as much as possible use software providers who have services in the EEA, however it maybe in some cases we liaise with a provider out with the EEA.

Any data that is transferred out with the EEA we will take steps to ensure that the country is compliant with data protection legislation and there are appropriate means in place to safeguard your data.

## What are my rights?

### Changes in personal information

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

### Your rights in connection with personal information

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 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 delete or remove your personal information where you have exercised your right to object to processing (see below).

**Object to 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 direct marketing purposes.

**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.

Who do I contact to exercise my rights or request a transfer of data?

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 an electronic copy of your personal information to another party, please contact Lindsey Boxall, Director – [lindsey.boxall@edenscott.com](mailto:lindsey.boxall@edenscott.com), 26 St Andrew Square, Edinburgh, EH2 1AF in writing. No fee is 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 requires extreme or unique measures. Alternatively, we may refuse to comply with the request in exceptional circumstances.

## What if I wish to withdraw my 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 Lindsey Boxall, Director. 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.

## How do I opt out of electronic marketing?

If you've given us your consent, we may use the information we've collected about you to send you marketing offers and news about our services using various channels such as mail, phone, email and SMS. We won't sell your personal information to other organisations outside of Eden Scott for marketing purpose.

If you prefer not to receive any future marketing communications you can remove your consent at any time by writing to or sending an email to our Director, Lindsey Boxall.

## How do I make a complaint?

You have the right to make a complaint about anything regarding the processing, storage, retention of your data. We would hope to resolve any complaint internally and if you would like to lodge a complaint with us in the first instance please contact Lindsey Boxall, [lindsey.boxall@edenscott.com](mailto:lindsey.boxall@edenscott.com).

However, you also have the right to lodge a complaint at any time to the Information Commissioner (ICO) in respect of our processing of your personal data. Information can be found at [www.ico.org.uk](http://www.ico.org.uk).