

## **PRIVACY POLICY**

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By working with/using the services of NDJ Consulting, you are accepting and consenting to the practices described in this policy.

NDJ Consulting (The Company) provides Candidate Networking/Referral/Suggestion and Support Services (ie NOT as a Recruitment Business or Agency). 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, or we may collect them from another source such as a job board/Linked In etc. The Company must have a legal basis for processing your personal data. For the purposes of providing you with Networking/Referral/Suggestion and Support Services and/or information relating to potential work opportunities that may be relevant to you we will only use your personal data in accordance with the terms of the following statement.

### **Collection & use of personal data**

Personal data is data that can identify you as a living individual. There is general personal data such as name, address, National Insurance number and online identifiers/location data. There is also sensitive personal data which includes information on physical and mental health, sexual orientation, race or ethnic origin, religious beliefs, trade union membership and criminal records. Sensitive personal data must be protected to a higher level.

### **Whose personal data do we hold?**

This privacy statement applies to personal data we process in relation to:

- Candidates
- Clients
- Suppliers
- Website users

As a Candidate Networking & Referral/Suggestion Service, we connect those potentially looking for a job ('Candidate') with businesses who are potentially looking for candidates ('Client'). For the purposes of this Privacy Statement, a Candidate (Permanent/Contractor or Interim) is either -

- An active job seeker OR
- Someone identified as a potential job seeker

Our Services include:

- The Networking/Referral and Suggestion of potentially suitable Candidates to Clients who may have a potentially relevant vacancy in support of a Project or Programme of work – includes the forwarding of a Candidates CV and personal details/data included (eg Contact details such as address, telephone numbers, email address) to a Client – all with the Candidates prior consent
- The Client, (and NOT NDJ Consulting) is wholly responsible for arranging any potential interviews/interview feedback, testing/testing feedback, negotiating offers, agreeing all Terms & Conditions of employment/engagement (verbally and in writing) etc, as well as conducting any appropriate employer referencing/professional qualification &



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education/credit/CV or criminal record checks and illegibility to work in the UK (or Country of work) - this is to fully satisfy themselves that a Candidate can be legally employed/engaged in a Permanent, Interim or Contract capacity

### **Purpose of processing personal data**

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with Networking/Referral and Support Services.

### **Recipient(s) of data**

The Company may share your personal data and/or sensitive personal data with trusted third parties where we have retained them to provide services that you or our Clients have requested, such as reference, qualification and criminal reference checking services (as required), verification of the details you have provided from third party sources, psychometric evaluations or skills tests. These third parties comply with similar and equally stringent undertakings of privacy and confidentiality as NDJ Consulting.

### **Statutory/contractual requirements**

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 a contract. You are obliged to provide the personal data. Failure to do so would result in The Company being unable to provide you with Networking/Referral and Support Services.

### **Overseas transfers**

The Company may transfer only the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with our Networking/Referral and Support Services. 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.

### **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.

We typically retain Candidate 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 Networking/Referral and Support Services

As NDJ Consulting don't contractually engage or payroll contractors we suggest/refer to our Clients' we do not need to keep payroll records, holiday pay, sick pay and pensions auto-enrolment records etc (this will be for the Client or their nominated PSL/MSA provider or whoever is the contractual engagement party).

Where the Company has obtained your consent to process your sensitive and personal data, we will do so in line with retention policy. 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.

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### 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 to withdraw consent at any time

We cannot give you access to a copy of your data if this would adversely affect the rights and freedoms of others.

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 emailing [neil@ndjconsulting.co.uk](mailto:neil@ndjconsulting.co.uk)

### Cookies

Our website **doesn't** use cookies to distinguish you from other users of our website. A cookie is a small text file that is stored on your computer when you visit a website.

### How we use your personal information

We may use information you give to us (with your consent):

- to give to 3rd parties who may wish to employ or engage you
- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us
- to notify you about changes to our service

We may use information we collect about you:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- to ensure that content is presented in the most effective manner for you
- as part of our efforts to keep our site safe and secure

Information we receive from other sources. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

### Disclosure of your information

We may share your information (with your consent) with selected third parties including:

- Business partners, suppliers, clients and subcontractors for the purpose of sourcing you, potential employment or engagement with a 3rd party
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets
- If NDJ Consulting or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other

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agreements; or to protect the rights, property, or safety of us, our customers, or others.  
This includes exchanging information with other companies and organisations for the  
purposes of fraud protection and credit risk reduction

### **Access to information**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a small admin fee of £10 to meet our costs in providing you with details of the information we hold about you. You may submit an email to [neil@ndjconsulting.co.uk](mailto:neil@ndjconsulting.co.uk) requesting the appropriate section of our Data Access & Amendments form ie;

- I wish to submit a Subject Access Request
- I wish to amend or update my existing data
- I wish to withdraw my consent to NDJ Consulting storing or processing my data

### **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates and changes to our Privacy Policy

### **Complaints or queries**

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact [neil@ndjconsulting.co.uk](mailto:neil@ndjconsulting.co.uk) You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113, 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.

**Company Name:** NDJ Consulting

**Company Contact:** Neil Jury

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