



Privacy Policy

ROBERTSON BELL ("We") are committed to protecting and respecting your privacy.

This Privacy Policy notice, together with our [terms & conditions of use](#) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The UK General Data Protection Regulation (UK GDPR) (Regulation (EU) 2016/679) is a regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

The Brexit transition period ended on 31 December 2020 and the UK has now officially left the EU. The UK GDPR has been directly incorporated into UK law sitting alongside the Data Protection Act 2018.

Your rights under the UK GDPR are set out in this notice.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of data protection legislation in force from time to time the data controller is ROBERTSON BELL of Euston House, Eversholt Street, London, NW1 1AD.

The Robertson Bell Data Protection Officer is Yasmin Aslam.

Who we are and what we do

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We collect the personal data of the following types of people to allow us to undertake our business;

- Prospective and placed candidates for permanent, Fixed Term Contract and temporary roles
- Prospective and live client contacts
- Supplier contacts to support our service
- Employees, consultants, temporary workers

We collect information about you to carry out our core business and ancillary activities.

Information you give to us, or we collect about you

This is information about you that you give to us by filling in forms on our website www.robertsonbell.co.uk or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, to enter our database, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site.

The information you give us, or we collect about you may include your name, address, private and corporate e-mail address and phone number, financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.



Information we collect about you when you visit our website

With regard to each of your visits to our site we will automatically collect the following information: technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information if applicable, browser type and version, operating system and platform. Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site, including date, time, length of visits to certain pages and page interaction information such as clicks.

Information we obtain from other sources

This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, personal recommendations and referrals. In this case we will inform you, by sending you this privacy notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.

We are working closely with third parties; technical, professional, payment and other services, advertising networks, analytics providers, search information providers, credit reference agencies, professional advisors including LinkedIn, various job boards and engage. We may receive information about you from them for the purposes of our recruitment services and ancillary support services.

Purposes of the processing and the legal basis for the processing

We use information held about you in the following ways:

To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.

To provide you with information about other services we offer that are similar to those that you have already been provided with or enquired about.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary, fixed term contract or permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on you to fulfil our legal obligations.

We will, in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate.)

Our Legitimate Business Interests

Our legitimate interests 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, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contacts is a fundamental and essential part of this process.

In order to support our candidates' career aspirations 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.

What kind of personal information do we collect?

The information described below is, of course, in addition to any personal data we are required by law to process in any given situation.

Candidate data:

Depending on the relevant circumstances and applicable laws and requirements, we may collect some or all of the information listed below to enable us to offer you employment opportunities which are tailored to your circumstances and your interests.

- Name
- Address
- Mobile/ telephone number
- Email address
- Gender
- Job Title
- Current company
- Employment preferences
- Availability
- Education details
- Employment history
- Referee / reference details
- Immigration / right to work status
- Nationality/citizenship/place of birth
- A copy of your driving licence and/or passport/identity card
- National Insurance number for tax purposes
- Your bank account details, payroll records and tax status information for payments
- Details of any criminal convictions if this is required for a role that you are interested in applying for
- Details about your current remuneration, pensions and benefits arrangements;
- Information on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website
- Extra information that you choose to tell us
- Extra information that your referees choose to tell us about you
- Extra information that our Clients may tell us about you, or that we find from other third party sources such as job sites
- CCTV footage if you attend our premises

We may also collect, store and use the following “special categories” of more sensitive personal information, specifically:

- Information about your health, including and medical condition, health and sickness records, disability-related information
- Information about your race or national or ethnic origin

Please note that the above list of categories of personal data we may collect is not exhaustive.

Client data: The data we collect about Clients is usually very limited. We generally only need to have your contact details or the details of individual contacts at your organisation (such as names, telephone numbers and email addresses). We also hold information relating to your online engagement, which we use to ensure that our marketing communications to you are relevant and timely. We may also hold extra information that someone in your organisation has chosen to tell us. If we need any additional personal data for any reason, we will let you know.



Supplier data: We collect a limited amount of data about Suppliers to make sure that our relationship runs smoothly. This might include; details for our contacts within your organisation, such as names, telephone numbers and email addresses; bank details so that we can pay you.

Data we receive from candidates and staff, such as referees and emergency contacts: All we need from referees is confirmation of what you already know about our Candidate or prospective member of Staff, so that they can secure that job they really want. To ask for a reference, we'll obviously need the referee's contact details (such as name, email address and telephone number).

Website users: We collect a limited amount of data from our Website Users to help us improve your experience when using our website and to help us manage the services we provide. This includes information such as, the frequency with which you access our website, your browser type, the location you view our website from, and the times that our website is most popular. If you contact us via the website, for example by using the contact form we will collect any information that you provide to us, for example your name, email and telephone number.

Consent

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, 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.

Other uses we will make of your data:

- Use of our website;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- We do undertake automated decision making or profiling.
- We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision- making process.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.



We use traffic log cookies to identify which pages are being used. This helps us to analyse data about web page traffic and improve our website in order to tailor it to our customer needs. We only use this information for statistical analysis purposes.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer, however this may prevent you from taking full advantage of the website.

If you would like to know more about the cookies we use and read our *cookies policy* please [click here](#).

Disclosure of your information inside and outside of the EEA

We will share your personal information with:

Any member of our group both in the EEA and outside of the EEA,

Selected third parties including:

- clients for the purpose of introducing candidates to them;
- candidates for the purpose of arranging interviews and engagements;
- clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you;
- subcontractors including email marketing specialists, event organisers, payment and other financial service providers;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day).
- analytics and search engine providers that assist us in the improvement and optimisation of our site;
- credit reference agencies, our insurance broker, compliance partners and other sub-contractors for the purpose of assessing your suitability for a role where this is a condition of us entering into a contract with you.

We will disclose your personal information to third parties:

If ROBERTSON BELL 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 and conditions* of supply of services and other agreements; or to protect the rights, property, or safety of ROBERTSON BELL, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The lawful basis for the third party processing will include:

- Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- satisfaction of their contractual obligations to us as our data processor;
- for the purpose of a contract in place or in contemplation;
- to fulfil their legal obligations.



Where we store and process your personal data

The data that we collect from you may/will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. ROBERTSON BELL will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Retention of your data

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 and that you are happy for us to do so. Accordingly, we have a [data retention policy](#) and run data routines to remove data that we no longer have a legitimate business interest in maintaining.

We try to ensure our data about you is accurate. Prior to making an introduction we check that we have accurate information about you, and we keep in touch with you so you can let us know of changes to your personal data.

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:

- the nature of the personal data;
- its perceived accuracy;
- our legal obligations;
- whether an interview or placement has been arranged; and
- our recruitment expertise and knowledge of the industry by sector and job role.

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

Click to see our [retention policy](#)

Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your personal data for marketing purposes. You can also exercise your rights at any time by contacting our data representative via email: gdp@robertsonbell.co.uk

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.



The GDPR provides you with the following rights.

To:

- **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.
- **Request the transfer** of your personal information to another party in certain formats, if practicable.
- **Make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

Access to information

The Data Protection Act 2018 and the UK GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete. Your right of access can be exercised in accordance with the Act and the UK GDPR.

A subject access request form can be requested from gdp@robertsonbell.co.uk. Or by post from:

GDPR
Robertson Bell
UoN Innovation Centre
Northampton
NN1 1SY

If you are requesting a subject access request form by post, please ensure your letter is sent via Royal Mail Signed service.

On receipt of your application, we may comply with your request or, additionally do one of the following:

We may ask you for more information about your request, or ask you to verify your identity, and

Where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.

Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

Contact

Questions, comments, and requests regarding this privacy notice should be addressed to Yasmin Aslam, GDPR, Robertson Bell, Innovation Centre, 1 Green Street, Northampton, NN1 1SY or gdp@robertsonbell.co.uk