

**PRIVACY POLICY**

Real Talent Matters Limited is committed to protecting the privacy of our candidates, clients and users of our website. We want to provide a safe and secure user experience. We will ensure that the information you submit to us via our website (http://www.realtalentmatters.com) or through any of our offices is only used for the purposes set out in this policy.

**WHO WE ARE**

For the purposes of data protection laws, Real Talent Matters Limited, a company registered in Scotland with number SC514863 , whose registered address is Swire House, Souter Head Road, Aberdeen, AB12 3LF is the controller.

If you have any questions about this policy, including any requests to exercise your legal rights, please contact using the details set out below:

Email address: info@realtalentmatters.com

**THE DATA WE COLLECT ABOUT YOU AND HOW WE COLLECT IT**

“Personal data”, or “personal information”, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Candidate Data

We may collect personal data from you directly (e.g. when you submit information on our website) or from third party sources, such as a client, a referee, a job site or social media.

We may collect, store and transfer different kinds of personal data about you which may include: your name, email address, telephone numbers, date of birth, job history, educational history, passport, driving licence, nationality and place of birth, immigration status (including whether you need a work permit), any information in your CV, bank details, national insurance and tax information, next of kin and family details, information contained in references and pre-employment checks from third parties, details of criminal convictions and medical history (where these are required for a role). This data is referred to as “Candidate Data” in this Policy.

Client Data

If you are an individual contact at an organisation which is a client or a potential client of ours, we may collect your personal data such as your name, telephone number and email address. We may collect your personal data from you directly (e.g. when you submit information on our website) or from third party sources. This data is referred to as “Client Data” in this Policy.

**HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to and for the purposes set out in this Policy. These are:

When you give your consent

When necessary for the performance of a contract we have entered into or are entering into with you

When necessary to comply with a legal or regulatory obligation

For our legitimate interests or those of a third party, provided that your interests and fundamental rights and freedoms do not override those interests

**PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We have set out below a description of the ways we may use your personal data.

Candidate Data

We may use Candidate Data:

to register you as a candidate and to enable you to submit your CV

to notify you of potential roles and opportunities

to assess and review your suitability for roles and opportunities

to introduce you and/or supply you to clients

to engage you for a role with a client

to facilitate our payroll and invoicing processes

to carry out background and reference checks to verify information that you have provided

to manage our relationship with you which will include notifying you about changes to our terms or privacy policy

Client Data

We may use Client Data:

to introduce and/or supply candidates to your organisation

to contact your organisation in relation to our recruitment services

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the details set out above.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. We may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**DATA STORAGE**

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will take all reasonable steps to ensure that your personal data is treated securely and in accordance with this Policy.

Information you provide to us is stored on our internal systems. We take reasonable steps to ensure that any third parties hosting our website and our other services have adequate security measures in place to protect personal data. 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.

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

**DISCLOSURES OF YOUR PERSONAL DATA**

We generally do not give your personal data to third parties but there are some exceptions.

Candidate Data

We may share your personal data in the following ways (as appropriate):

with clients for the purpose of introducing you to them or supplying you to them

with past employers, referees and other third parties for the purpose of verifying information you have provided

with third parties that provide services such as qualification and criminal record checks to the extent required for a role

with any actual or prospective seller or buyer of our business and/or any assets. Information held by us about our customers and any users will be one of the transferred assets

with our group companies, which means our subsidiaries and holding companies

in order to comply with any legal obligation or as otherwise permitted by law

Client Data

We may share your personal data:

with our group companies, which means our subsidiaries and holding companies

in order to comply with any legal obligation or as otherwise permitted by law

**MARKETING COMMUNICATIONS**

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you.

You will receive marketing communications from us if you have requested information or services from us and you have opted in to receiving marketing communications.

You can ask us or third parties to stop sending you marketing messages by contacting us at any time.

**DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

**YOUR LEGAL RIGHTS**

Under data protection law you have the following rights in respect of your personal data:

* to request information regarding the personal data that we hold about you and the source(s) of that information. You can request a copy of any personal data we hold about you. This service is usually free of charge, although we have the right to charge a ‘reasonable fee’ in some circumstances;
* to request that we rectify any inaccuracies in relation to the personal data we hold;
* in some circumstances, to request the erasure of your personal data or object to the processing of your data;
* to object to any direct marketing;
* in some circumstances, to request that your personal data be transferred to you or a new provider if the data is processed automatically;
* to withdraw consent to us processing your personal data. This will not affect the processing already carried out with your consent; and
* to lodge a complaint with a supervisory authority. In the UK, this is the Information Commissioner’s Office. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

If you wish to exercise any of the rights set out above, please contact us using the details set out in this policy.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to a person who does not have the right to receive it.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

**LINKS**

Our website may include links to third-party websites and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these thirdparty websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.