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# Privacy, Data Protection and Information Security Policy

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**Revised: October 2022**

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## Jacobs Massey Privacy, Data Protection, and Information Security Policy

This document covers our website, Timesheets App, Recruitment and AV Production services, Vacancy Updates service, Cookies, and Usage Terms and Conditions. It also covers how we collect, retain and process personal data in respect of the Data Protection Act (the UK implementation of GDPR).

### Introduction

Jacobs Massey Ltd (“the Company/We/Us”) is registered as a data controller with the Office of the Information Commissioner. For details of the Company’s Data Registration (Z8083889) visit <https://ico.org.uk/>. We will use our best efforts to ensure that the personal information you submit to us is kept private and confidential and only used for the purposes described in our Data Registration and this Privacy, Data Protection, and Information Security Policy. By continuing to use our services or website you consent to us processing information supplied by you as explained in this Policy.

### Principles

JacobsMassey is committed to upholding the principles underlying data protection, privacy, and information security. We believe that fulfilling this commitment is essential to meeting the objectives of our business. JacobsMassey fully recognises its duties and responsibilities under data protection laws. We always use our best efforts to ensure the personal or confidential information we receive is kept private and secure, and only used for the purposes for which it is provided.

A handwritten signature in black ink, appearing to read 'G. Massey', with a stylized flourish at the end.

5<sup>th</sup> October 2023

Graeme Massey  
Managing Director JacobsMassey

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## Information About Visitors ("General Information")

When visitors come to our website, we log the user's IP address which is automatically recognised by the web server.

### Cookies

- Unless you have indicated your objection by refusing them when you first visited our website, our system will issue cookies to your computer when you log on to the site. Cookies are small pieces (files) of information regarding your browsing habits ("General Information") that are stored on your computer. These small files are known as cookies. They are not used to identify you personally.
- Cookies can make it easier for you to log on to and use the site during future visits. They also allow us to monitor website traffic and may be used to customise the site for you.
- We also use Google Analytics for such purposes, it sets cookies to accurately track visits to the website and stores information on the pages you visit, how long you are on the site, how you got here and what you click on. It does not collect or store personal information, so this information cannot be used to identify who you are.

### Your Activity on Our Website

- The information generated by the cookies about your use of our website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of our website, compiling reports on website activity and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google undertakes not to associate your IP address with any other data held by Google.
- You should have the ability to accept or decline cookies (although some employers may restrict this ability on their computers). Most web browsers automatically accept cookies, but you can choose to modify your browser settings to decline all cookies, or to notify you each time a cookie is offered and allow you to accept or decline cookies on an individual basis.
- If you choose to decline cookies, however, that may hinder performance and negatively impact your experience on the website. For specific details about how to configure your browser you should refer to its supplier or manufacturer. We may share General Information with our website consultants from time to time in order to help us develop this website.

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## Privacy and Data Protection Notice

This Notice tells you what to expect in relation to personal information about you that is collected, handled and processed by Jacobs Massey Limited (JacobsMassey). JacobsMassey, of 48 Warwick St, London W1B 5AW, is the Data Controller.

JacobsMassey acknowledges and agrees that any personal data of yours that we handle will be processed in accordance with all applicable data protection laws in force from time to time. Currently, with effect from 25<sup>th</sup> May 2018 the Data Protection Act (the UK implementation of GDPR) applies.

### The information we may collect

The information about you we may collect, hold and process is set out below:

**A) Information collected and processed for finding you a suitable role includes the following:**

- Your name
- Your address
- Your email address
- Your telephone number
- Your CV/work history
- Your Job preferences including role, geographical areas and salary
- Other work related information you provide such as education and professional training
- Copy of your passport
- If relevant, copies of work permits or visas
- Date of birth
- Your National insurance number
- Full details of job offers and placements
- Your Work-related References
- Financial information (including but not limited to salary, payroll details and terms, HMRC data, pension scheme details, court orders and statutory payments)
- A log of our communications with you via personal contact, and by email and telephone
- Copies of emails sent between you and ourselves; and between us and prospective employers

**B) Information in respect to individual candidates that have worked with us previously or may work with us on a continuing basis includes the following:**

- Copy of Passport

- In some cases, copies of work permits and visas
- Date of Birth
- Your Right to Work information
- National insurance number
- Full details of job offers and placements
- In certain cases, medical information
- In some cases we may be required to provide Disclosure and Barring Service ( DBS ) or Enhanced DBS check for some of our clients. There is no charge to candidates for these checks.
- Your Work-related References, using information provided by you
- Financial information (including but not limited to salary, payroll details and terms, HMRC data, pension scheme details, court orders and statutory payments).
- A log of our communications with you via personal contact, and by email and telephone.
- Copies of emails sent between you and JacobsMassey, and between JacobsMassey and prospective employers.

The above information will have been provided, or will be provided, by you or a third party who we work with, such as a Job Board Company or another employment business or agency. In the case of references, these will be from your present or previous employer(s) who contact details you have provided for this purpose. Medical information may be supplied by a third party, such as your GP, Consultant or Occupational Health.

## **C) Information collected in the course of our normal business activities**

During our normal business activities, we may collect and store your contact information (name, organisation, email address, etc) and use this for occasional communications about our company, products and services. For this we may sometimes use Mailchimp to send our emails. The Mailchimp Privacy Policy can be found at: <https://mailchimp.com/legal/privacy/>

## **How we use the information**

The above information is used, as set out below, to provide our services to you in our capacity as an employment business / agency to find you suitable work, whether on a permanent or temporary basis based on your requirements. We will only pass your personal details or CV to a third party, such as prospective employers, with your express permission and consent.

## **The information under A above may be used as follows:**

- To match your skill sets with job vacancies to assist in finding you the positions that most suit you

- To put forward your details to our clients and prospective employers for you to be considered for vacancies
- To place you with our clients and prospective employers
- To keep you informed of available opportunities as they arise
- To keep you informed of the services offered by us
- For the administrative and market research purposes of the Company.

### **The information under B above may be used as follows:**

- To establish that you have the right to work in the UK or other countries as required by the vacancy
- To deal with any medical and health and safety issues relating to certain positions
- To put in place contractual arrangements and documentation once a role has been secured
- To ensure you are paid in a timely manner if you are placed in a temporary or contract position

### **How we hold the information**

All the personal data we have is stored on our databases in the UK & EEA.

We adopt appropriate data collection, storage and processing practices, and data security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data generated by your engagement with our Recruitment or AV Production services, use our website, Timesheets App or Vacancy Updates service that is stored on our servers. In the event of a data security breach, we will take immediate steps to mitigate any damage and will notify affected users soon as is practicable.

### **Disclosure of your information**

Your CV and related information will be shared or sent to prospective employers and our clients. Once you have secured a placement additional information will be provided to them to enable the placement to proceed. Such employers and clients will usually be located inside the United Kingdom or European Economic Area (EEA) but may be outside of the EEA. Personal data shall not be transferred to a country or territory outside the EEA unless that country or territory ensures an adequate level of protection or the appropriate safeguards are in place for your rights and freedoms. Before such a transfer takes place outside of the EEA, we will provide you with further information concerning this and request your permission.

Other trusted third parties that we may share your data with are as follows: HM Revenue and Customs, pension scheme providers, legal advisors and other companies for the purpose of undertaking pre-engagement checks for the role, or for paying you.

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## The legal basis for processing the information

We will rely on your explicit consent and 'Legitimate Interest' (as outlined by the ICO – <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/legitimate-interests/when-can-we-rely-on-legitimate-interests/>) to process your information (as outlined in A and B above) which is collected at the outset of the recruitment process and subsequently during the process of securing you a placement, or through your use of our website, Timesheets App or Vacancy Updates service.

- Information and documentation to establish your right to work is processed by us as we are legally obliged to do so.
- In respect of medical information, the basis for us processing this will depend on the circumstances, but will usually be for one of the following reasons: it is necessary to protect health and safety or to prevent discrimination on the grounds of disability or where consent has been obtained, if required.
- Information in relation to criminal record checks, which are relevant for some roles, will be processed on the basis that it is necessary for us to comply with the law or consent will be obtained, if required.
- Once a position has been found for you, we will process your personal data, including financial information, for the purpose of you entering into a contract to fulfil your role and to enable us to pay you, depending on the specific contractual arrangements and circumstances.
- For the purposes of paying you, where relevant, we are legally obliged to provide information to HMRC.
- Once a placement has been secured, we may also process your data on the basis of our legitimate interests i.e. for administrative purposes.

## Your rights

The Data Protection Act gives you a set of specific rights over your personal information:

**Right of access** – if you want to know if we are storing or processing any personal data about you, you can contact us to find out. If this is the case, you may find out what purpose it is being stored for and request a copy of your data by contacting us. Your data will be supplied as soon as is practical in a CSV (comma separated value) file format which can be opened as a simple text file or as a spreadsheet. There is no charge for making a request or for the electronic data file, but if the number and frequency of requests is unreasonable we may charge an admin fee.

**Right to correction** – if you believe that any information we are holding on you is incorrect or incomplete, please contact us as soon as possible. We will promptly correct any information found to be incorrect.

**Right to erasure** – if you want to remove your personal data from our records, you can request this by contacting us. We will remove the data as far as it is practically within our power, and where we are not legally obliged to retain it.

**Right to object** – if you no longer want us to process your data you can request this by contacting us.

**Right to complain** – if you are unhappy with how we are managing your personal data, you can lodge a complaint with the UK supervisory authority, the Information Commissioner’s Office (ICO).

## Retention of your data

Your data will be retained for no longer than is necessary or required by law, and in accordance with this Privacy Policy. We will review our data retention regularly, and at a minimum of every 2 years.

## Data Access Control

We have a robust joiners, movers and leavers’ process, which together with role profiling, ensures access is granted on a “least privilege” basis to reflect the requirements of the role and is lowered or removed immediately when it is no longer relevant. When a member of staff leaves the company their user account is disabled immediately, and all other access to systems is revoked.

## Vacancy Updates service

We will hold and process your data (email address) only for the purpose of informing you about vacancies, the Updates service and our other recruitment services. If you choose to Unsubscribe from the service we will endeavour to erase your data immediately and within 28 days at the latest.

## Withdrawal of consent

If you have provided us with your consent to process your data, for the purpose of using our services and us finding you suitable work, you have the right to withdraw this at any time. In order to do so you should contact us by emailing [dataconsent@jacobsmassey.co.uk](mailto:dataconsent@jacobsmassey.co.uk).

## Concerns

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to Information Commissioners Office at <https://ico.org.uk/concerns/>



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## Timesheets App

Our Timesheets App also collects personal data as outlined below:

### Information Collection and Use

To enable our Timesheets App to function properly and for a better user experience while using our Timesheets App Service, we may require you to provide us with certain personally identifiable information and permissions. This include Cookies, Email Address, Password, Push Notifications and Badge Numbers permissions. The information that we request is will be retained by us and used as described in this privacy policy.

#### Log Data

Whenever you use our Service, we collect data and information regarding your device. This data may include information such as your device token, device name, operating system version, the configuration of the Timesheets App when utilising our Service, the time and date of your use of the Service and limited other statistics.

### Our Timesheets App does not record or store your mobile phone number

#### Storage details

We store your Timesheets App Login credentials (email and password) locally on your device which may be on an SD card or your phone's internal memory. We use this information to facilitate your login process and during use of our Timesheets system. This combination of information should never be shared with other persons.

#### Cookies

The Timesheets App uses cookies to collect information in webview. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of this Service or face reduced functionality.

#### How We Protect Your Information

- We adopt appropriate data collection, storage and processing practices, and data security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data generated by your use of our website stored on our servers or Timesheets App. In the event of a data security breach, we will take immediate steps to mitigate any damage and will notify affected users soon as is practicable.

#### Disclosure of Your Information

- The information you provide to us will be held on our computers in the UK and the EU and may be accessed by or given to our staff working outside the UK and third parties who act for us for the purposes set out in this policy or for other purposes approved by you. Those parties process information and provide support services on our behalf. We may also pass

aggregate information on the usage of our site to third parties but this will not include information that can be used to identify you.

- We may also pass your information to prospective third party employers but we will use our best efforts to ensure that information that will identify you is not submitted to any third party employer until and unless we have received authorisation from you to do so, by telephone, email, or meeting you.
- If our business enters into a joint venture with or is sold to or merged with another business entity, your information may be disclosed to our new business partners or owners.
- Countries outside the European Union do not always have strong data protection laws. However, we will always take steps to ensure that your information is used by third parties in accordance with this policy.
- Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

### Data Updates

- We make best efforts to ensure that all information held relating to you is kept up-to-date, accurate and complete. In this regard, we also rely on you to notify Us if your information requires updating or deleting. We will respond to requests from you to update or delete your information in an efficient and timely manner.

### Your Acceptance of this Policy and Our Terms & Conditions

- By using this website or downloading and installing our Timesheets Mobil App, you signify your acceptance of this policy. If you do not agree to this policy, please do not use our Website or App. Your continued use of the website or our Timesheets App will be deemed acceptance by you of this Privacy Policy and [Our Terms & Conditions](#).

### Contact

Please address any questions, comments, or requests regarding our data processing practices to Graeme Massey, Compliance and Assurance Director: [dataconsent@jacobsmassey.co.uk](mailto:dataconsent@jacobsmassey.co.uk) We will endeavour to respond as promptly as possible.

## Privacy, Data Protection and Information Security Policy Review

This Policy will be reviewed each year, or earlier if new legislation is introduced that needs to be reflected in the policy.

### Policy Revised: October 2023

You can download a pdf copy of this policy from:  
[http://jacobsmassey.co.uk/pdf/Jacobs\\_Massey\\_Ltd\\_Privacy\\_Policy.pdf](http://jacobsmassey.co.uk/pdf/Jacobs_Massey_Ltd_Privacy_Policy.pdf)