

PRIVACY POLICY

This is an important notice regarding your privacy and the way in which [Choralis Consulting Ltd] (referred to as “we”, “our” or “us” in this policy) collects and makes use of your personal data. We want to be open and transparent with you, and therefore encourage you to contact us if you have any questions about this policy or the ways in which we use your personal data.

This policy applies to individuals outside of our organisation, for example, applicants for vacancies, customers, employees of our clients and suppliers, and the general public. We take our privacy responsibilities seriously and are committed to protecting and respecting your privacy.

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.

For the purpose of applicable privacy legislation, the data controller is [*Choralis Consulting Ltd, Kings House, Home Park Estate, Station Road, Kings Langley, WD4 8LZ.*]. Our company registration number is [04744034].

Questions regarding this policy should be directed to our Data Protection Officer. The Data Protection Officer is responsible for ensuring compliance with relevant data protection legislation and with this policy. That post is held by our [*Laura West*], who can be contacted at Laura.west@choralis.co.uk Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Data Protection Officer.

1. What information do we hold about you?

We may collect, store and use personal data about you (referred to throughout this privacy policy as **personal information**):

Applicants

- Personal contact details such as the name, title, address, telephone number and e-mail address;
- Recruitment information (including, for example, your driving licence, passport or visa information, the information provided to us within your DBS check and other personal information included in an application form, CV or cover letter as part of your application for employment with us);
- Personal information provided to us by our recruitment partners in relation to your application for employment with us;

- Personal information gathered during your application process including personality or psychometric test data (i.e. tests administered by our third party test supplier)¹.

Employees of our clients and suppliers

- Contact details such as your name, title, business telephone number and business e-mail address.
- Information you provide or we collect during our interactions with you or your employer, such as how long we have done business with you or how long you have worked at your company.
- If you use a personal card to pay for our services, payment information such as credit/debit card number, expiration date, security code and name as it appears on the card and address the card is registered to.

Customers

- Personal details such as your name, title, personal telephone and e-mail address and address.
- Payment information such as credit/ debit card number, expiration date, security code and name as it appears on the card and address the card is registered to.

Generally

- If you visit our premises, images and videos are recorded by the CCTV in operation onsite.
- Any personal information gathered when you visit our offices via our visitor sign-in process, including your name and vehicle registration.
- Any personal information you provide to us via our website, for example, by using the “Contact us” page on our website.
- Any personal information you provide to us during your interactions with us.
- Information gathered by cookies used on our website. 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 and also allows us to improve the way our website works. For detailed information on the cookies we use and the purposes for which we use them please refer to our Cookie Policy [<http://www.choralis.co.uk/contact/cookie-policy/>].

¹ Some businesses require psychometric testing and DBS checks and where they do this should be included within the policy as well as any other tests/assessments that the business request the applicants complete.

- Information gathered by our security monitoring and auditing software to create logs of data about the ways that our website is used by those who have login access to it.
- Information gathered by our servers to create logs of data about the ways that our website is used by those who access it.
- Information provided to us by third party service providers we work with, for example, payment service or analytics providers.

2. How long will we use your personal information and what is the legal ground we rely on for doing so?

We will only use your personal information when the law allows us to. When we use your personal information, we must have a legal ground for doing so. The following are (amongst others) the legal grounds by which we can use your personal information:

- Where you have provided us with your consent for us to do so.
- Where we need to perform the contract we have entered into with you or to take steps to enter into a contract with you.
- Where we need to comply with a legal obligation to which we are subject.
- Where it is in pursuit of our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

More specifically, we will use your personal information in the following circumstances:

Applicants:

- To evaluate and progress your application for employment with us – *to perform the contract with you or to take steps to enter into a contract with you, and in pursuit of our legitimate interests to verify your suitability for our vacancies.*
- To keep a record of your application – *in pursuit of our legitimate interests in the event we wish to offer to place you in another role within our organisation.*
- To carry out driving licence checks – *in pursuit of our legitimate interests to verify your suitability for our driver vacancies.*
- To carry out right to work checks – *to comply with a legal obligation to which we are subject.*
- To verify DBS results – *to comply with a legal obligation to which we are subject.*

Employees of our clients and suppliers:

- Your contact details – *in pursuit of our legitimate interests to facilitate business between your organisation and ours.*
- Your contact details to provide you with further information on our products and services. This may include technical information and/or marketing information – *in pursuit of our legitimate interests (keeping you informed about our products, services and business updates).*
- To manage your customer account –*in pursuit of our legitimate interests (to facilitate business between your organisation and ours).*
- To provide your organisation with our services – *in pursuit of our legitimate interests (to facilitate business between your organisation and ours).*

Customers

- Your contact details to facilitate your transaction or proposed transaction with us – *to perform the contract with you or to take steps to enter into a contract with you.*
- Your contact details to provide you with information on our products and services – *to perform the contract with you or to take steps to enter into a contract with you.* This may also include marketing information – *[where you have provided us with your consent for us to do so].*
- To manage your customer account – *to perform the contract with you or to take steps to enter into a contract with you.*
- Your personal details and payment information to facilitate your transaction with us – *to perform the contract with you.*
- Your personal details and payment information to identify and prevent fraud – *in pursuit of our legitimate interests (to prevent fraud for you and for us).*

Generally:

- To ensure our premises are kept secure – *in pursuit of our legitimate interests (site security and evidence).*
- Health and safety purposes – *to comply with a legal obligation.*
- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes – *in pursuit of our legitimate interests (to better understand how people interact with our website and solve any issues it may have).*
- To improve our website to ensure that content is presented in the most effective manner for you and your computer – *in pursuit of our legitimate interests (to improve our content and your experience).*

- To secure our website and the data processed by it – *in pursuit of our legitimate interests (for the prevention, investigation, mitigation and remediation of alleged security breaches).*
- To transfer to third party service providers – *in pursuit of our legitimate interests (outsourcing for effectiveness and efficiency).*
- To contact you if we wish to use your personal information for a purpose not set out in this policy – *to comply with a legal obligation.*

3. What happens if there is a change of purpose?

We will only use your personal information 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 we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

4. Which type of third parties might we share your personal information with?

We require third parties to respect the security of your personal information and to treat it in accordance with the law. For example, where we instruct third party service providers, we carry out due diligence on those providers to ensure they treat your personal information as seriously as we do.

We may share your personal information with the following types of third parties:

- Technical support providers, for example, assisting us with our website.
- Recruitment partners assisting us with employment related matters, for example, recruitment agencies and job boards.
- Professional advisers such as lawyers, accountants and business analysts.
- Providers which assist us in assessing your suitability for employment, for example, providers who facilitate online testing.
- Providers who assist us in our disaster recovery procedures, for example, back up centres.
- Providers which help us collate and organise information effectively and securely.
- Providers which help us with logistics and delivery solutions.
- Third party software hosting companies which provide us with software solutions such as our customer relationship management system.
- Providers which host our servers in their data centres (these are all within the UK).

- Providers assisting us with payment and fraud prevention solutions.
- Our group companies.

5. Data retention

How long will you use my personal information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for.

We assess the appropriate retention period for different information based on the size, volume, nature and sensitivity of that information, the potential risk of harm to you from unauthorised use or disclosure of that information, the purposes for which we are using that information, applicable legal requirements for holding that information, and whether we can achieve those purpose(s) through other means.

Applicants

- Where your application for employment with us is successful, we will provide further information during the course of your employment as to how we use your personal information.
- Where your application for employment with us is unsuccessful, we will keep your personal information and you may at any time opt to remove this from our files.

Employees of our clients and suppliers

- Where we have collected your personal information during the course of your and our organisations doing business, we will keep your information for as long as this business carries on, or for as long as we have a commercial interest in holding your personal information, for example, with a view to doing business in the future.
- Where you use our website and one of our cookies are activated, that cookie will operate for the duration set out in our Cookie Policy [LINK].

Customers

- Where we have collected your personal information during the course of your and our organisations doing business, we will keep your information for as long as this business carries on, or for as long as we have a commercial interest in holding your personal information, for example, with a view to doing business in the future.
- Where we have collected your personal information as a result of you creating an account with us, we will keep your personal information until you delete that account, or it has been inactive for [X years].

Generally

- Where you use our website and one of our cookies are activated, that cookie will operate for the duration set out in our Cookie Policy [LINK].

- Any information collected for security purposes is stored only for as long as needed for the purposes stated above. If you wish to find out more information about our security data retention periods, please contact our Data Protection Officer using the details listed at the beginning of this privacy policy. **Where we store your personal information**

Electronic versions of your personal information are stored on our servers which are currently located with Microsoft in [the UK] and on our back up servers for disaster recovery purposes which are currently also with Microsoft. We have taken steps to ensure *any third party processors assisting us with processing your personal data* respect your personal information and treat it in accordance with the law.

[We also use cloud hosting solution providers to assist us with storing and processing your personal information. Where their servers are based outside of the EEA (European Economic Area), we have taken steps to ensure your personal information is adequately protected and the transfer is lawful. For example, by putting place the standard contractual clauses which allow for the transfer of personal information outside of the EEA.]

6. Rights of access, correction, erasure and restriction

Your rights in connection with your 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 the 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 stop processing personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information, 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.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party, please contact our Data Protection Officer in writing using the contact details set out at the beginning of this privacy policy.

7. No fee 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 is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

8. 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 the information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to another person who has no right to receive it.

9. Marketing

Where we are providing you with marketing information, you can also change your marketing preferences by using the unsubscribe button at the bottom of our marketing e-mails to you.

10. What happens if you fail to provide personal information?

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing you with our products or services), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of visitors to our offices).

11. Right to complain

You have a right to make a complaint if you wish to do so. The organisation with oversight of our processing is the Information Commissioner's Office which can be contacted in writing at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, by telephone (0303 123 1113) or by e-mail (casework@ico.org.uk).

12. Changes to this privacy notice

We may change, modify, add or remove portions of this privacy policy at any time, and any changes will become effective immediately.

Any changes we make to our privacy policy will be posted on this page and, where appropriate, notified to you.