

Privacy policy

Privacy Policy for Kaizen Talent Solutions Limited

Right to Object: You have a legal right to object at any time to:

- (i) use of your personal information for direct marketing purposes; and
- (ii) processing of your personal information which is based on our legitimate interests, unless there are compelling legitimate ground for our continued processing.

Kaizen Talent Solutions Limited (company number 09864284) ("Kaizen", "we", "us" or "our") 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, or which we collect, via various channels (including our website, through written correspondence (including e-mail), conversations or meetings with our consultants), is only used for the purposes set out in this policy.

Through this Privacy Policy we aim to inform you about the types of personal data we collect from candidates, the purposes for which we use the data and the ways in which the data is handled. We also aim to satisfy the obligation of transparency under the EU General Data Protection Regulation 2016/679 ("GDPR") and national laws implementing GDPR.

For the purpose of this Privacy Policy the controller of personal data is Kaizen and our contact details are set out in the **Contact** section at the end of this Privacy Policy.

The Information we collect

We will collect your personal details, including but not limited to your name and contact details (together with your e-mail address) and other relevant information from your Curriculum Vitae ("CV"). On occasion this will also include sensitive personal information such as details of criminal convictions and ethnic origin. When we receive your details and CV electronically, this may be through a direct application on one of our websites or an application that you have made through a third party job board.

We will likely obtain further personal information about you during the course of our relationship with you. This information may be obtained from you directly or from third parties, such as organisations to whom we have provided your CV and who have engaged with you as part of a job application.

How we use your Personal Information

We will hold, use and disclose your personal information, for our legitimate business purposes including:

1. to provide our services to you;
2. to maintain our business relationship, where you are a user of our website, a client or candidate;
3. to enable you to submit your CV for general applications, to apply for specific jobs or to subscribe to our job alerts. Please see the separate section on **Curriculum Vitae** below which outlines additional uses and disclosures;
4. to match your details with job vacancies, to assist us in finding a position that is most suitable for you and to send your personal information (including sensitive personal information) to clients in order to apply for jobs;
5. to retain your details and notify you about future job opportunities other than the specific role for which you have contacted us;
6. to answer your enquiries;
7. to direct-market products and services, advise you of news and industry updates, events, promotions and competitions, reports and other information. Before we do so, you will be given an option to opt-out of such communications and an option to unsubscribe will also be provided with each communication;
8. to fulfil contractual obligations with our clients;
9. to provide further services to you by sharing your personal information with trusted third parties. Further details about this are set out in the separate section below on **Sharing your Personal Information**;
10. to release personal information to regulatory or law enforcement agencies, if we are required or permitted to do so;
11. our website uses a website recording service which can record mouse clicks, mouse movements, page scrolling and any text keyed into website forms. Data collected by this service is used to improve our website usability. The information collected is stored and is

used for aggregated and statistical reporting, and is not shared with anybody else.

12. In order to provide you with personalised content on our website, with more relevant communication in our emails, and with a tailored service from our consultants, we track and record your usage and interaction with our website and emails. We employ a third party service provider to help us record, store and analyse this information to determine how we might best deliver your engagement. We ensure that no personally identifiable attributes are recorded in this database and, other than our chosen service provider, we do not share this information with any other business or affiliate.

We may process, in accordance with local regulations, certain sensitive personal data (known as special category data in GDPR) where you include it in information you send to us e.g. if you include information about your health, religion or ethnic origin in the CV you send to us. We may also be required to conduct a criminal records check against your details. We have processes in place to limit our use and disclosure of such sensitive data other than where permitted by law.

The Legal Basis for Processing your Personal Information

Under GDPR, the main grounds that we rely upon in order to process personal information of clients and candidates are the following:

- (a) **Necessary for entering into, or performing, a contract** - in order to perform obligations that we undertake in providing a service to you, or in order to take steps at your request to enter into a contract with us, it will be necessary for us to process your personal data;
- (b) **Necessary for compliance with a legal obligation** - we are subject to certain legal requirements which may require us to process your personal data. We may also be obliged by law to disclose your personal data to a regulatory body or law enforcement agency;
- (c) **Necessary for the purposes of legitimate interests** - either we, or a third party, will need to process your personal data for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your personal data protected. Our legitimate interests include responding to requests and enquiries from you or a third party, optimising our website and customer experience, informing you about our products and services and ensuring that our operations are conducted in an appropriate and efficient manner;

(d) **Consent** - in some circumstances, we may ask for your consent to process your personal data in a particular way.

How we share your Personal Information

In certain circumstances we will share your personal information with other parties. Details of those parties are set out below along with the reasons for sharing it.

Clients

We disclose your personal information to clients who have vacancies for jobs in which you are interested.

Trusted Third Parties

We will share your personal information and, where necessary, your sensitive personal information with trusted third parties where we have retained them to provide services that you or our clients have requested, such as:

- employment reference checking;
- qualification checking;
- criminal reference checking (as required);
- verification of details you have provided from third party sources; and/or
- psychometric evaluations or skills tests.

We will also share your personal information with third parties who perform functions on our behalf and provide services to us such as:

- professional advisors;
- data analytics providers;
- IT consultants carrying out testing and development work on our business technology systems;
- research and mailing houses; and/or
- function co-ordinators.

We require minimum standards of confidentiality and data protection from such third parties. To the extent that any personal information is provided to third parties outside the EEA, or who will access the information from outside the EEA, we will ensure that approved safeguards are in place, such as the approved Model Clauses or the EU/US Privacy Shield.

Regulatory and Law Enforcement Agencies

As noted above, if we receive a request from a regulatory body or law enforcement agency, and if permitted under GDPR and other laws, we may disclose certain personal information to such bodies or agencies.

New business owners

If we or our business merges with or is acquired by another business or company, we will share your personal information with the new owners of the business or company and their advisors. If this happens, you will be sent notice of such event.

How long we will hold your information

The length of time we will hold or store your personal information for will depend on the services we perform for you and for how long you require these. As we often support candidates with placements over many years, and potentially throughout their careers, the purpose for which we retain candidate data is often an ongoing purpose. We conduct regular data-cleansing and updating exercises with our candidates to ensure that (a) the data that we hold is accurate and (b) we are not holding data for too long.

Our standard terms of business state that our clients should retain candidate data such as CVs for the purposes of the specific role you apply for and that, as controllers of your data, they should inform you if they plan to retain your CV on file in order to notify you about potential future roles, or to otherwise hold or use your data for other purposes.

Your rights on Information we hold about you

You have certain rights in relation to personal information we hold about you. Details of these rights and how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.

Right of Access

You have the right at any time to ask us for a copy of the personal information about you that we hold. Where we have good reason, and if the GDPR permits, we can refuse your request for a copy of your personal information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so.

Right of Correction or Completion

If personal information we hold about you is not accurate, out of date or incomplete, you have a right to have the data rectified, updated or completed. You can let us know by contacting us using any of the methods in the **Contact section** below.

Right of Erasure

In certain circumstances, you have the right to request that personal information we hold about you is erased e.g. if the information is no longer necessary for the purposes for which it was collected or processed or our processing of the information is based on your consent and there are no other legal grounds on which we may process the information.

Right to object to or restrict processing

In certain circumstances, you have the right to object to our processing of your personal information by contacting us using any of the methods in the **Contact section** below. For example, if we are processing your information on the basis of our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests. You also have the right to object to use of your personal information for direct marketing purposes.

You may also have the right to restrict our use of your personal information, such as in circumstances where you have challenged the accuracy of the information and during the period where we are verifying its accuracy.

Right of Data Portability

In certain instances, you have a right to receive any personal information that we hold about you in a structured, commonly used and machine-readable format.

You can ask us to transmit that information to you or directly to a third party organisation.

The above right exists only in respect of personal information that:

- you have provided to us previously; and
- is processed by us using automated means.

While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third party organisation's systems. We are also unable to comply with requests that relate to personal information of others without their consent.

You can exercise any of the above rights by contacting us using any of the methods in the **Contact section** below.

Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

Consent

To the extent that we are processing your personal information based on your consent, you have the right to withdraw your consent at any time. You can do this by contacting us using the details in the **Contact section** below.

Curriculum Vitae

We give you the option of submitting your CV via our website or by providing your CV to one of our consultants. You can do this either to apply for a specific advertised job or for consideration by our recruitment consultants for positions as they come up.

Your CV will be stored in our database, and will be accessible by our recruitment consultants.

You can update your CV at any time, simply by following the same procedure to submit a new CV. Your old CV will automatically be archived providing the submission details remain the same (for example you submit both CVs using the same email address or you advise the relevant contact of your new submission).

Aggregate Information about Kaizen online visitors

We gather information and statistics collectively about all visitors to our website, for example:

- which area users access most frequently; and/or
- which services users access the most.

We only use such data in the aggregate form. This information helps us determine what is most beneficial for our users and how we can continually improve our online services to create a better overall experience for our users.

Use of Cookies

Like most websites, when you visit our sites we place cookies on your computer or other device. For the most part, these cookies are used to enable the websites' functionality, improve the user experience or help us to optimise our websites, measure traffic and other internal management purposes.

We run targeted and relevant banner advertising on a number of whitelisted websites around the world to present you with jobs and content that we believe will be of interest. We target these adverts based on your previous interactions with our website, with our emails and through your engagements with our consultants. Your interaction with our advertising may be used to measure the effectiveness of our advertising campaigns and to improve our marketing strategy in accordance with our legitimate interests. No advertising campaigns or advertising tracking technology records your personally identifiable information.

Complaints

If you are unhappy about our use of your personal information, you can contact us using the details in the **Contact section** below. You are also entitled to lodge a complaint with the UK Information Commissioner's Office using any of the below contact methods:

Telephone: 0303 123 11113

Website: <https://ico.org.uk/concerns/>

Post:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Other websites

Please note that clicking on links and banner advertisements on our websites can result in your browser accessing a third-party website, where data privacy practices are different to that of Kaizen.

We are not responsible for, and have no control over, information that is submitted to or collected by these third parties and you should consult their privacy policies.

Internet-based transfers

Given that the Internet is a global environment, using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis.

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 via third party networks; 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.

Changes to our Privacy Policy

This privacy policy can be changed by Kaizen at any time. If we change our privacy policy in the future, we will advise you of material changes or updates to our privacy policy by email, where you have provided us with your email address.

Equal Opportunities

Kaizen is an equal opportunities employer and a company committed to diversity. This means that all job applicants and members of staff will receive equal treatment and that we will not discriminate on grounds of gender, marital status, race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion or age.

As part of our commitment to equal opportunities we will from time to time use information provided by you for the purposes of diversity monitoring. All such information will be used on an anonymised basis.

Contact

If you have any enquires or if you would like to contact us about our processing of your personal information, including to exercise your rights as outlined above, please contact us either by email or letter to the following address: -

Email: info@kaizen-ts.co.uk

Post:

Data Protection Office
210 St Bernards Road
Solihull
West Midlands
B92 7BH

If you have a complaint please contact us either by email or letter to the following address: -

Contact name: Simon Owens (Data Protection Officer)

Email: simon@kaizen-ts.co.uk

When you contact us, we will ask you to verify your identity.

Our registered office is at:

Kaizen Talent Solutions Limited
210 St Bernards Road
Solihull
West Midlands
B92 7BH