

## **PRIVACY POLICY**

**Combined Selection Group Limited** (company number 06962058) is committed to protecting the privacy of our candidates, clients and users of our website.

This policy explains when and why we and companies in our group\* (which includes our subsidiaries, ultimate holding company and its subsidiaries from time to time) collect personal information about individuals, how this information is used, the conditions under which it may be disclosed to others, and how it is kept secure. We will ensure that the information you submit to us via our website, email or through any of our offices is only used for the purposes set out in this policy.

This policy may change from time to time so please check this page occasionally to ensure that you're happy with any changes. Please see the "[Changes to this policy](#)" section.

### **Who we are**

Combined Selection Group Limited is the data controller in relation to the processing activities described below. This means that Combined Selection Group Limited decides why and how your personal information is processed.

Where this policy refers to "we", "our" or "us" below, unless it mentions otherwise, it's referring to Combined Selection Group Limited.

### **How we collect your personal information**

We collect personal information about you in the following ways:

#### **1. Personal information you give to us:**

This is information about you that you give to us by entering information via:

- our site [www.csqtalent.com](http://www.csqtalent.com);
- social media platforms, such as LinkedIn; and
- corresponding with us by phone, email or otherwise,

and is provided entirely voluntarily. This includes information provided at the time of registering to use our site, subscribing to the services we provide through our site, requesting further services, and engaging in correspondence with us by phone, email or otherwise.

We may also ask you for information when you report a problem with our site. If you complete any surveys that we request you complete for research purposes, we will collect information in such circumstances as well. The information you give us includes your name, address, email address and phone number, enquiry details and may include records of any correspondence and responses to any surveys.

#### **2. Personal information we collect about you:**

We may automatically collect information automatically from individuals when you visit our website and details of activities you carry out through the site, including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources you access.

We may also automatically collect technical information, including anonymous data collected by the hosting server for statistical purposes, the Internet protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

Please see "[Cookies](#)" for further information.

We may also collect any personal information which you allow to be shared that is part of your public profile or third party social network (for example, your LinkedIn profile), type and version, time zone setting, browser plug-in types and versions, operating system and platform.

### 3. Personal information we may receive from other sources:

We may receive the following:

- We offer some of our services on or through other websites (such as advertising websites and job boards) and the personal information that you provide to those sites may be sent to us in order to deliver recruitment services. Please see the section "[What types of personal information we collect about you](#)" for details on the personal information we receive.
- We may obtain certain personal information about you from sources outside of our business which may include our group companies\* or other third party contacts/companies (for example, when headhunting or networking, we may receive a business card from a third party containing personal information) in order to deliver recruitment services. Please see the section "[What types of personal information we collect about you](#)" for details on the personal information we receive.
- We may obtain information from the disclosure and barring service (DBS) to assist with recruitment decisions and inform us about suitability of candidates working with vulnerable groups and children. The sensitive personal information received from DBS may include criminal offences and/or records.

### **What types of personal information we collect about you**

Combined Selection Group Limited may process a range of personal information about you. To make it easier to understand the information that we use about you, we have divided this information into categories in the table below and provided a short explanation of the type of information each category covers.

<b>Category</b>	<b>Personal information included in this category</b>
<u>Behavioural</u>	your activities, actions and behaviours
<u>Biographical</u>	your life and education experiences, including qualifications and educational establishment details, and intelligence and psychometric test results.
<u>Contact</u>	information which can be used to address, send or otherwise communicate a message to you (including name, title, address, telephone numbers and email addresses)
<u>Identification</u>	information contained in a formal identification document or social security or other unique reference relating to you
<u>Sensitive</u>	any personal information that relates to your health or criminal offences or records about you
<u>Employment</u>	your previous, current or future employment details, including job titles, location of workplace or employment, work history, start/end dates, working hours, training records, professional memberships
<u>Correspondence</u>	information contained in our correspondence or other communications with you about our services or business, including emails and electronic telephone recordings from our use of call recording software.
<u>Benefits</u>	your previous, current or future salary, annual leave and benefits information
<u>Recruitment information</u>	any other information included in a CV, cover letter, application form or reference (including date of birth, gender) and information you provide to us during an interview.

## **How do we use your personal information?**

The purposes for which we use your information and the legal basis under data protection laws on which we rely to do this are as follows:

- **Legitimate interests or that of a third party.** This includes:
  - To communicate to you via text, email, social media or telephone to provide you with our recruitment services, and to facilitate and administer the recruitment process.
  - 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 to clients in order to apply for jobs;
  - To correspond or communicate information with you;
  - To fulfil contractual obligations with our clients;
  - To manage your questions, queries, complaints, claims and enquiries;
  - To assess and improve our service to clients and candidates through recordings of any calls;
  - For the establishment and defence of our legal rights;
  - To comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
  - To verify the accuracy of data that we hold about you and create a better understanding of you as a candidate;
  - For marketing activities (other than where we rely on your consent to contact you by email or text with information about our other services/products, as explained below);
  - For analysis to inform our marketing strategy, and to enhance and personalise your customer experience (including to improve the recommendations we make to you on our website);
  - For assessing the quality of our service and to provide staff training within the business, for example, we may use call recording software when you contact us by telephone.
  
- **Consent.** This includes:
  - From time to time, we may contact you via email, text, telephone with marketing information about our other services, or those services/products of the other entities within our group\*, if you:
    - (i) register with us online or make an online enquiry and indicate that you would like to receive such information;
    - (ii) if you make an enquiry by telephone we may ask if you would like to provide your consent to receive with marketing information from us,
    - (iii) sign up to job alerts or our newsletter via our website; or
    - (iv) when you refresh your marketing preferences when responding to a request from us to do so;
  - From time to time, we may contact you via email, text, telephone with details of reports, promotions, offers, networking and client events and general information about the industry sectors which we think might be of interest to you;
  - If you are applying for a particular job which requires us to process your sensitive personal information. For example, the job involves working with a vulnerable group and we obtain your criminal records information. We will always request your explicit consent before using any sensitive information about you. Please see [“What types of personal information we collect about you”](#) for further details regarding this category

You may withdraw your consent for us to use your information in any of these ways at any time. Please see [“Withdrawing your consent”](#) for further details.

- **Legal obligations.** This includes:
  - to assist the police or other public authority or criminal investigation body;
  - to identify you when you contact us;

- to verify the accuracy of data we hold about you; and
- to establish your right to work.

### **Who might we share your personal information with?**

We may share your personal information as follows:

- With prospective employers in order to apply for jobs or to assess your eligibility for jobs.
- With third parties where we have retained them to provide services that we, you or our client have requested including references, qualifications and criminal reference checking services, verification of the details you have provided from third party source, psychometric evaluation or skill test. These third parties may share your information with us, which we will use in accordance with this policy. In some cases they will be acting as a controller of your information and therefore you would advise you to read their privacy policy in these instances.
- With third parties, regulatory or law enforcement agencies if we believe in good faith that we are required by law to disclose it in connection with the detection of crime, the collection of taxes or duties, to enforce or apply the terms of our contracts, to protect the rights, property or safety of our visitors and clients, in order to comply with any applicable law or order of a court of competent jurisdiction, or in connection with legal proceedings.
- With third parties service providers, agents, subcontractors and other organisations who perform functions on our behalf and who also provide services to us or to you on our behalf, such as professional advisors, IT consultants carrying out testing and development work on our business technology systems, cloud service providers (such as hosting and email management), administrative services, advertising agencies, payroll, research and mailing houses and function co-ordinators. When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.
- Other companies within the Combined Selection Group\* in the ways set out in the “[How do we use your personal information](#)” section, in connection with recruitment services that complement our services or for internal processes.
- As customer satisfaction is important to us, we may ask a third party research company to contact you for the sole purpose of gathering general information and specific information relating to us and our services.
- If Combined Selection Group Limited merges with or is acquired by another business or company (in whole or in part), we may share personal information with the new owners of the business or company and their advisors.

### **Where do we store your personal information?**

Your information is inputted and then housed securely on our central database servers which are located within the European Economic Area (EEA) and is coded to enable our consultants and support staff easy and efficient access to your records.

If at any time we transfer your personal information to, or store it in, countries located outside of the EEA (for example, if our hosting services provider changes) we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law. This is because some countries outside of the EEA do not have adequate data protection laws equivalent to those in the EEA.

If you use our services whilst you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.



## **Security**

The transmission of information over the Internet can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to our website, and any transmission is at your own risk. Once we receive your information, we have put in place reasonable and appropriate measures to ensure its security on our systems and prevent your personal information from being accidentally lost, used or access in an unauthorised way, altered or disclosed.

Where we collect any sensitive personal information about your health and criminal record, we will apply additional security controls to protect that data.

Where we have given (or where you have chosen) a password which enables you to access an account, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Our website may contain links to other websites run by other organisations. This policy does not apply to those other websites, so we encourage you to read their privacy statements. We cannot be responsible for the privacy policies and practices of other websites even if you access them using links that we provide. In addition, if you linked to our website from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

## **How long do we keep hold of your information?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for and our obligations under other laws.

### **1. Retention periods**

Subject to the paragraphs below, we will retain your personal information as set out in the table below. We have referred to the same data categories as detailed in the table above in the [“What types of personal information we collect about you”](#) section.

<b>Data category</b>	<b>Retention period/criteria</b>
Contact information, employment and benefit details	4 years from the date at which you supplied your information or subsequently updated your information with Combined Selection Group Limited
Behavioural, biographical and other recruitment information contained within a CV, covering letter or reference	4 years from the date at which you supplied your information or subsequently updated your information with Combined Selection Group Limited
Correspondence	4 years
Identification	12 months
Sensitive	6 months

### **2. Retention in case of claims**

We may need to retain certain personal information to establish, bring or defend legal claims against us for 7 years after the date it is no longer needed by us for any of the purposes listed under [“How we use your personal information”](#) section above, in case we need the information to establish, defend or bring legal claims.

### **3. Retention in accordance with legal and regulatory requirements**

We will carefully consider whether we need to retain your personal information after the period described above in case of a legal or regulatory requirement

#### 4. Exceptions

The only exceptions to the above retention periods are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further [“Erasing your personal information or restricting its processing”](#) below); or
- in limited cases, the law permits us to keep your personal information indefinitely provided we put certain protections in place.

### Cookies

Like many other websites, our website uses cookies (including Google Analytics, Google Adwords, Facebook Pixel, Volcanic Platform cookies to obtain an overall view of visitor habits and visitor volumes to our website). 'Cookies' are small pieces of information sent to your computer or device and stored on its hard drive to allow our websites to recognise you when you visit. It is possible to switch off cookies by setting your browser preferences. For more information on how we use cookies and how to switch them off on your device, please visit our [Cookies Policy](#).

### Your rights

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one month from either (i) the date that we have confirmed your identity or (ii) where we do not need to do this because we already have this information, from the date we received your request.

- **To be informed about the processing of your information.** This is what this privacy policy sets out to do.
- **Accessing your personal information.** You have the right to ask for a copy of the information that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.
- **Correcting and updating your personal information.** The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us in any of the details described at the end of this policy.
- **Withdrawing your consent.** Where we rely on your consent as the legal basis for processing your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can do so using our unsubscribe tool. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.
- **Objecting to our use of your personal information and automated decisions made about you.** Where we rely on your legitimate business interests as the legal basis for processing your personal information, you may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the

matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data. You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, please use our unsubscribe tool.

- **Erasing your personal information or restricting its processing.** In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request. You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. In these situations we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.
- **Transferring your personal information in a structured data file.** Where we rely on your consent as the legal basis for processing your personal information, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine readable form, such as a CSV file. You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.
- **Complaining to the UK data protection regulator.** If you have concerns about the way we have handled your personal information, we encourage you to contact us and we will seek to resolve any issues or concerns you may have. You will find our contact details at the end of this policy. You have the right to complain to the Information Commissioner's Office (ICO) if you are concerned about the way we have processed your personal information. Please visit the ICO's website for further details.

If you want to exercise any of these rights, please contact us using the details at the end of this policy.

### **Changes to this policy**

We may review this policy from time to time and any changes will be notified to you by posting an updated version on our website and/or by contacting you by email. Any changes will take effect 7 days after the date of our email or the date on which we post the modified terms on our website, whichever is the earlier. We recommend you regularly check for changes and review this policy whenever you visit our website. If you do not agree with any aspect of the updated policy you must immediately notify us and cease using our services.

### **Contact us**

Should you have any queries or issues about this policy or about the way we process your personal information, please contact us by writing our Information Representative us at Combined Selection Group Limited, Springwood House, Low Lane, Horsforth, LS18 5NU, or emailing us at [data@csgtalent.com](mailto:data@csgtalent.com). If you prefer to speak to us by phone, our telephone number is +44 (0)333 323 2000.

**\*Group companies** – The group companies include Combined Selection Group Ltd, Combined Selection Group Holdings Ltd, Combined Selection Contracting Ltd, Clear Edge Search and Selection Limited, Contract UK Staffing Solutions Ltd