



## Qualiteach Limited Privacy Notice

### Mission Statement

Qualiteach Limited (“We”) are committed to protecting and respecting your privacy. This notice sets out the basis on which we will be processing any personal data we collect from you, or that you provide to us. Further information about us and our business can be found on our website: <https://qualiteachltd.co.uk/about/>.

Following the UK’s withdrawal from the EU, the UK government has implemented the UK GDPR to work alongside the Data Protection Act 2018.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a European Union regulation on information privacy in the European Union and the European Economic Area. It regulates the processing by an individual, a company or an organisation of personal data relating to individuals in the EU, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Your rights under the Data Protection Act 2018 and UK GDPR are set out in this notice.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of data protection legislation, the applicable data controller is Qualiteach Limited of Our Office 9th Floor, One Canada Square, London, E14 5AA.

### Who we are and what we do

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We collect the personal data of the following types of people to allow us to undertake our business;

- Prospective and placed candidates for permanent or temporary roles;
- Prospective and live Client contacts;
- Supplier contacts to support our services;
- Employees, Consultants, Temporary Workers, Sole Traders, freelancers;

We collect information about you to carry out our core business and ancillary activities.



### **Information you give to us or we collect about you.**

This is information about you that you give us by filling in forms on our websites <https://qualiteachltd.co.uk> or by corresponding with us by phone, email or otherwise. It includes information you provide when you register to use our websites, enter our databases, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our sites or pages, enter competitions, refer candidates, participate in promotions or surveys and when you report a problem with our sites.

The information you give us or we collect about you may include your name, address, private and corporate e-mail address and phone number, financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

### **Sensitive Personal Information.**

Your personal and sensitive data is important to us, Qualiteach will collect and store your data on our secure database during the period we provide work finding services to you. During this time, we will collect and store sensitive information regarding your criminal record, barred status and other sensitive safeguarding data. Where Qualiteach has obtained your consent to process your personal and sensitive data to provide work finding services, we will do so in line with our retention policy. Upon expiry of that period Qualiteach will seek further consent from you. Where consent is not granted Qualiteach will cease to process your personal and sensitive personal data and delete it in line with our retention policy.

### **Information we collect about you when you visit our website.**

With regard to each of your visits to our site we will automatically collect the following information: technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information if applicable, browser type and version; information about your visit, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our office (unless withheld).

### **Information we obtain from other sources.**

This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, personal recommendations, social media sites and incoming emails. In this case we will inform you, by sending you this privacy notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.



# Qualiteach

## Education Recruitment Specialists

We are working closely with third parties including companies within our Group, business partners, sub-contractors in technical, professional, payment and other services, advertising networks, analytics providers, search information providers, credit reference agencies, professional advisors and other agencies and clients. We may receive information about you from them for the purposes of our recruitment services and ancillary support services.

### **Purposes of the processing and the legal basis for the processing**

We use information held about you in the following ways:

To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.

To provide you with information about other goods and services we offer that are similar to those that you have already purchased, been provided with or enquired about.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary or permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation, and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on to you to fulfil our legal obligations.

We will in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate).

### **Our Legitimate Business Interests**

Our legitimate interests in collecting and retaining your personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.

In order to support our candidates' career aspirations and our clients' resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements.



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To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts. This information is then used to propose jobs to candidates and to introduce candidates to clients. We also use the information to determine trends in the market and to extract other pieces of information concerning the IT market that is useful to our clients. This can include average daily/hourly rates, time spent in specific roles, career progressions and retention rates.

To deliver our ancillary services we need to collect contact information so we can advertise certain events we hold or send information regarding current events that may be of interest in relation to the areas of recruitment we specialise in.

### **Consent**

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

### **Other Uses we will make of your data:**

- Use of our website;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

We do not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

### **Cookies**

Our website uses cookies to distinguish you from other users of our website. Details of our cookie policy can be found on our website.



### **Disclosure of your information.**

We will share your personal information with selected third parties including:

- Any of our group companies;
- clients for the purpose of introducing candidates to them;
- candidates for the purpose of arranging interviews and engagements;
- clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you;
- analytics and search engine providers that assist us in the improvement and optimisation of our site;
- credit reference agencies, our insurance broker, compliance partners and other sub-contractors for the purpose of assessing your suitability for a role where this is a condition of us entering into a contract with you.
- Former employers whom we may seek references from
- Payroll service providers who manage payroll on our behalf or other payment intermediaries whom we may introduce you to
- Other recruitment agencies in the supply chain
- Auditors who are assessing the compliance and processes of the Company to ensure it is adhering to all relevant legislation and good practice guidance

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Qualiteach Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of or terms and conditions of website or supply of services and other agreements we enter into with you; or to protect the rights, property, or safety of Qualiteach Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The lawful basis for the third-party processing will include:

- Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- satisfaction of their contractual obligations to us as our data processor;
- for the purpose of a contract in place or in contemplation;
- to fulfil their legal obligations.



### **Where we store and process your personal data**

Your personal data will be stored by is or by our third-party partners. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored either on our secure servers or on the secure servers of third parties we engage with specifically to hold this information.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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; 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.

### **Retention of your data**

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so. Accordingly, we have a data retention notice and run data routines to remove data that we no longer have a legitimate business interest in maintaining.

We do the following to try to ensure our data is accurate:

- prior to making an introduction we check that we have accurate information about you
- we keep in touch with you so you can let us know of changes to your personal data
- We monitor certain sites such as LinkedIn to amend data as may be needed.

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:

- the nature of the personal data;
- its perceived accuracy;
- our legal obligations;
- whether an interview or placement has been arranged; and
- our recruitment expertise and knowledge of the industry by country, sector and job role.



# Qualiteach

## Education Recruitment Specialists

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

Our current retention notice is at the end of this document.

### Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your personal data for marketing purposes.

You can exercise your right to accept or prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at [compliance@qualiteachltd.co.uk](mailto:compliance@qualiteachltd.co.uk)

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### The GDPR provides you with the following rights.

#### To:

- **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 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 delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.





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- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, 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 in certain formats, if practicable.
- **Make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

### Access to information

The Data Protection Act and the GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete.

Your right of access can be exercised in accordance with the Act and the GDPR.

A subject access request should be submitted to [compliance@qualiteachltd.co.uk](mailto:compliance@qualiteachltd.co.uk)

No fee will apply.

### Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

### Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to [compliance@qualiteachltd.co.uk](mailto:compliance@qualiteachltd.co.uk)



## Retention Notice

Record	Retention Period	Storage Format	Lawful basis and reference
<p>Work-seeker records</p> <ul style="list-style-type: none"> <li>Name/address and if under 22, date of birth</li> <li>Any terms between recruitment business and the work-seeker and any variations</li> <li>Details of the work-seeker's training, experience, qualifications and any authorisation to undertake particular work</li> <li>Names of hirers to whom the work-seeker is introduced or supplied</li> <li>Details of any resulting engagement and date from which it takes effect</li> <li>Details of any enquiries made under Regulations 19, 20 and 22 about the work-seeker and the position concerned</li> </ul>	<p>The maximum this data would be kept is up six years from the date of your work-finding services in line with the Limitation Act 1980</p>	<p>Paper or electronic</p>	<p><b>Legal obligation</b></p> <ul style="list-style-type: none"> <li>Kept in line with the Conduct of Employment Agencies and Employment Businesses Regulations 2003 (Reg 29)</li> </ul> <p><b>Legitimate business interest</b></p> <ul style="list-style-type: none"> <li>To protect the business against any legal claims for breach of contract <ul style="list-style-type: none"> <li>Kept in line with the Limitation Act 1980 (s.5)</li> </ul> </li> <li>To keep records to demonstrate that safeguarding processes are adhered to and followed</li> <li>To contact the candidate for any further work-finding services</li> <li>To protect business against any legal claims</li> </ul>
<p>Records relating to/demonstrating compliance with Working Time Regulations 1998:</p> <ul style="list-style-type: none"> <li>Registration of work and rest periods</li> <li>Working time opt-out forms</li> </ul>	<p>Kept for two years from the date on which the record was made</p>	<p>Paper or electronic</p>	<p><b>Legal obligation</b></p> <ul style="list-style-type: none"> <li>Kept in line with the Working Time Regulations 1998 (Reg 9)</li> </ul>
<p>Copies of identification documents/right to work</p>	<p>Kept for two years from date of termination of employment</p>	<p>Paper or electronic</p>	<p><b>Legal obligation</b></p> <ul style="list-style-type: none"> <li>Kept in line with the Immigration (Restrictions on Employment) Order (Art 6(1)(b))</li> </ul>



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<p>Criminal records information</p> <ul style="list-style-type: none"><li>• Information forms</li><li>• DBS check forms</li><li>• DBS certificates</li></ul>	<p>Kept available for a period of at least 2 years</p>	<p>Paper or electronic</p>	<p><b>Legitimate business interest</b></p> <ul style="list-style-type: none"><li>• To demonstrate that safeguarding processes were followed</li></ul>
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