

Legal

Arrowe Recruitment is a trading name of Arrowe Recruitment Limited registered in England & Wales under number 12080945.

A list of directors is open for inspection at the registered office Stanhope House, Mark Rake, Bromborough, Wirral, CH62 2DN. Email Address info@arrowerecruitment.com

Our Privacy Policy

Arrowe Recruitment Limited is committed to protecting and respecting your privacy.

This policy (together with our, cookie policy and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The General Data Protection Regulation ((EU) 2016/679) (GDPR), effective on 25 May 2018, gives data subjects (living individuals in respect of whom personal data is processed) enhanced rights and protections in relation to their personal data. We are committed to safeguarding the privacy of the users of our services. This policy provides complete clarity as to what personal data we collect, why we collect that personal data and how we handle it. We are the Data Controller and Data Processor (as that term is defined in data protection legislation).

Please read this privacy policy carefully. By visiting any of our websites you are accepting and consenting to the practices described in this policy.

1. What information do we collect?

The following tables set out what personal information we may process, why we process that personal information and the legal basis for such processing:

1.1 Information you give us.

What personal data might be supplied to us?	Why we process that personal data:	The legal basis for processing that personal data.
<p>Client Data: Information about you which relates to your application with us. This information may include your name, your postal address, your email address and your telephone and/or mobile number, and such other information as we determine is needed to verify the identity of our clients/candidates.</p>	<p>We will process this data to verify your identity, maintain your application with us, to provide our services, to communicate with you and to back up our database. The reason we process this data is to ensure the proper administration of the client's/candidates instructions and our business and, where you have entered into an agreement with us, for the purposes of fulfilling our contract with you.</p>	<p>The legal basis we rely on for processing this data is as follows:- Our legitimate interests; or - Fulfilment of our agreement with you or the instructing client; or-Complying with our legal obligations.</p>

<p>Registration Data: Information you provide when you register to use our website, enter a competition, promotion or survey, or when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number.</p>	<p>We will process this data so we can deal with your registration, or other communications or applications, or to address your query or concern. The reason we process this data is to ensure the proper administration of your registration and our business.</p>	<p>The legal basis we rely on for processing this data is as follows:-</p> <p>Our legitimate interests; or - Consent.</p>
<p>Communication Data: If you communicate with us (through our website contact form, via email, phone, post or any other means of communication by which you choose to contact us), we will process the information contained in your communication. This information may include your name and contact information, the content of your communication and any metadata our website generates where you communicate with us using the contact form available on our website.</p>	<p>We will process that information so we can correspond with you and keep records of such correspondence.</p>	<p>The legal basis we rely on for processing this data is as follows:-</p> <p>Our legitimate interests; or - Consent.</p>
<p>Recruitment Data: Where you register your interest in a current or potential job or role with us, or otherwise provide us with information in relation to a job or role (either directly, indirectly or through an agent who you have instructed for this purpose) we will process your data so that we can access your suitability for the job or role with us. The data we will retain will include your name, your contact details and your curriculum vitae (CV).</p>	<p>We will process this information so that we can access your suitability for any current or potential job or roles with us and so that we can contact you about any such opportunities. The reason we are processing this data is to ensure the proper administration of our business. You have also consented to us using your data for these purposes where you have applied for a vacancy or role with us.</p>	<p>The legal basis we rely on for processing this data is as follows:-</p> <p>Consent; and/or Our legitimate interests.</p>
<p>Notification Data: Where you have purchased services from us, or where you subscribe to receive our email notifications and/or newsletters, we will process your data so that we can send such email notifications and/or newsletters to you.</p>	<p>We will only process such personal information where you have consented to us doing so.</p>	<p>The legal basis we rely on for processing this data is as follows:- Consent.</p>
<p>Regulatory Data: We may process your data if we need to do so in order to comply with our legal and/or regulatory obligations, and/or so that we can protect the vital interests of you or another natural person.</p>	<p>The reason we will process such data is to protect the vital interests of you or another natural person, or in order to comply with our legal and/or regulatory obligations.</p>	<p>The legal basis we rely on for processing this data is as follows:- Vital interests; or- Our legitimate interests; or- Compliance with our legal and regulatory obligations.</p>

1.2 Information we collect from other sources.

What personal data might we collect from other sources?	Why we process that personal data:	The legal basis for processing that personal data.
<p>Transaction Data: When a client/candidate instructs us to provide recruitment services, the client/candidate will need to provide certain information to us so that we can supply those goods / services. The personal information which may be communicated to us in the course of supplying services to our clients/candidates may include a data subject's name, contact details, payment card details and other personal information relevant to a transaction.</p>	<p>We will process that data in order to perform our contract with you and/or our client and to fulfil the transaction. We also need to comply with our regulatory obligations when administering our business.</p>	<p>The legal basis we rely on for processing this data is as follows:-</p> <p>Performance of our contract with you or our instructing client; or- Our legitimate interests.</p>
<p>Technical Data: Technical information relating to your use of our websites, including (1) the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We may obtain this data through our analytics tracking system; and (2) information about your visit to our website(s), including the full Uniform Resource Locators (URL), clickstream to, through and from our website(s) (including date and time), products and services you viewed or searched for, 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.</p>	<p>We process this data so we can monitor and analyse how our websites are used so we can improve our websites and our services. This helps us to administer our business and improve the services we offer.</p>	<p>The legal basis we rely on for processing this data is as follows:-</p> <p>Our legitimate interests.</p>
<p>Third Party Data: This is information we receive about you if you use any of the websites we operate or the services we provide. We are working closely with third parties (including, for example, consultants, business partners, and professionals, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We may receive personal data</p>	<p>We process this data so that we can properly administer our business.</p>	<p>The legal basis we rely on for processing this data is as follows:- Our legitimate interests.</p>

<p>about you from these organisations. Those organisations will have their own privacy policies detailing how they process personal data. In particular, we may receive information from other linked companies. Please see paragraph 3 below for more information.</p>		
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2. Cookies

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 our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our cookie policy.

3. When will we disclose your personal data to others?

3.1 We may need to share your personal information with certain selected third parties including:

(a) our business partners, suppliers and sub-contractors for the purpose of performing any contract we have with you or them. In particular, we use third party companies to process your personal data in order: (1) to carry out our identity and credit verification checks : (2) legal support services (including the processing of information by the courts service and barristers), (3) confidential information destruction and deletion services; (4) data storage services; (5) communication facilities; (6) document production services; (7) event support and management services; (8) public relations services; (9) banking services; (10) to manage legal filings and registrations; (11) legal search services; (12) conferencing facilities and call answering facilities; and (13) any other services which we deem are necessary to properly manage our business and comply with our legal and regulatory obligations.

(b) analytics and search engine providers that assist us in the improvement and optimisation of our website.

3.3 We will also disclose your personal information to third parties in the following circumstances:

(a) If we sell or buy any business or assets, in which case we may need to disclose certain personal data to the prospective seller or buyer of such business or assets.

(b) If all or most of our assets are acquired by a third party, in which case personal data held by us about our clients will be one of the transferred assets.

(c) 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 any legal agreement we have with you; or to protect our rights or property, or the safety of us, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

3.4 Where appropriate and in accordance with local laws and requirements, we will share your personal data, in various ways and for various reasons, with the following categories of people: (1) Appropriate colleagues (this may include colleagues in overseas offices); (2) In the case of Temporary Workers, and in limited circumstances as appropriate, medical professionals such as your GP or an occupational health specialist; (3) In the case of Temporary Workers, the Client where you as a Temporary Worker are or will be working; (4) In the case of Temporary Workers, prospective employers (for example, when providing a reference, where permissible in accordance with local laws and requirements); (5) Individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies; (6) Tax, audit, or other authorities, when we believe in good faith that the law or other regulation requires us to share this data

(for example, because of a request by a tax authority or in connection with any anticipated litigation); (7) Third party service providers who perform functions on our behalf (external suppliers and consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology Systems); (8) Third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place; (9) Marketing technology platforms and suppliers; (10) In the case of Candidates: potential employers and other recruitment agencies/organisations to increase your chances of finding employment; (11) In the case of Candidates: third party partners, job boards, job platforms, job aggregators, software providers and cloud based databases where we consider this will improve the chances of finding you the right job or improving recruitment processes more generally; (12) In the case of Candidates and our Candidates' and prospective members of Staff's referees: third parties who we have retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate and in accordance with local laws; (13) In the case of Candidates and the referees of Candidates: internal and external auditors of our Clients when we are required to share this data with them upon request in order to comply with our contractual or regulatory obligations; (14) In the case of Candidates: third parties helping us by developing services and processes to optimise the Candidate selection process in order to improve the quality and efficiency of recruitment services; (15) If the company merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the (prospective) new owners of the business or company.

4. Where do we store your personal data?

We will always try to ensure that your personal data is processed within the European Economic Area. In some circumstances this will not be possible. In circumstances where it is necessary for us to transfer your personal data outside the European Economic Area, we will only transfer such personal data to third parties where we have carried out due diligence on such third parties to ensure they will protect your personal data using similar standards and safeguards as we have. We will also have contractual provisions in place with such third parties to ensure your personal data is protected. Such contractual provisions will be based on the standard contractual clauses approved by the European Commission for the transfer of data outside the EEA or such other appropriate standards as are required from time to time by the European Commission or the UK Government. You consent to the transfer of your personal data outside of the EEA, as long as we comply with these requirements.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our services, 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 always secure. Although we will do our best to protect your personal data, and we will maintain appropriate technical and organisational measures to protect your personal data, we cannot guarantee the security of your data transmitted to our website; 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.

5. Storage and deletion or removal of personal data

(a) Any personal data that we process for the above purposes will be deleted. Where this is not possible, it will not be kept for longer than is necessary. In those circumstances it will be removed from our live systems once we have completed the purpose for which we were processing the personal data. Your personal data will then be put beyond use, and subject to clauses (b) and (c) below we will ensure:

(i) we will not be able (or attempt) to use the personal data to inform any decision in respect of any individual or in a manner that affects the individual in any way;

(ii) we will not give any other organisation access to the personal data;

(iii) we will surround the personal data with appropriate technical and organisational security; and

(iv) We commit to permanent deletion of the information if, or when, this becomes possible.

The purpose for which we are processing your personal data will last for a considerable period (for example, if you are a long term client of ours, we will need to store your data until our relationship with you comes to an end).

(b) We will determine the period for which we need to retain your data, acting reasonably, and taking into consideration a number of factors such as your relationship with us, your engagement with us, and the fulfilment of contracts we have with you.

(c) We may need to retain your personal data where this is necessary to comply with our legal or regulatory obligations, or to protect the vital interest or the vital interests of another natural person.

6. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Your rights

7.1 Under data protection laws you have the following fundamental rights:

(a) The right to access the personal data we hold about you;

(b) The right to have your personal data corrected if there are errors or inaccuracies in it, or your personal data is incomplete;

(c) The right to restrict the processing we carry out in relation to your personal data;

(d) The right to object to the processing we carry out in relation to your personal data;

(e) The right to have the personal data we hold about you provided to you in a useable format;

(f) The right to complain to a supervisory authority (in the UK this is the Information Commissioner's Office) about how and/or why we are processing your personal data;

(g) The right to tell us you no longer consent to us processing your personal data. In practice you will usually agree in advance to us using your personal data for marketing purposes and if you no longer wish us to use your personal data for marketing purposes, you can opt out of receiving such marketing messages at any time. You can do this either by unsubscribing from the marketing messages we send you, notifying us at compliance@arrowerecruitment.com.

7.2 You can ask us to provide you with details of any personal data we hold about you. You do not have to pay us a fee to access your personal data unless we believe your access request is unfounded, repetitive or excessive. In this case we may charge you a reasonable fee to access your personal data or we may decide not to comply with your request. We will notify you if this is the case. We will require you to provide appropriate evidence of your identity before we respond to your request. Typically this identification evidence will be a photocopy of your passport or photo driving licence, which a solicitor or bank has certified as being a true copy of the original and a copy of a recent utility bill detailing your current address.

7.3 If your personal data has been put beyond use, and the appropriate safeguards listed in 5. (a) (i) – (iv) have been put in place, you will not be able to have access to your personal information.

7.4 Our website 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, 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.

7.5 If you think that any of the data we hold about you is incorrect or inaccurate, you can contact us to correct such data. Please contact us at compliance@arrowerecruitment.com for these purposes.

8. Transfer of your data internationally

8.1 In order to provide you with the best service and to carry out the purposes described in this Privacy Policy, your data will be transferred: (1) to third parties (such as advisers or other Suppliers to our business); (2) to overseas Clients where applicable; (3) to Clients within your country, where applicable, who may, in turn, transfer your data internationally; (4) to a cloud-based storage provider; and (5) to other third parties, as referred to here.

8.2 We want to make sure that your data is stored and transferred in a way which is secure. We will therefore only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example: (a) by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws; or (2) by signing up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the United States of America or any equivalent agreement in respect of other jurisdictions; or (3) transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or (4) where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer data outside the EEA in order to meet our obligations under that contract if you are a Client of ours); or (5) where you have consented to the data transfer.

8.3 To ensure that your personal information receives an adequate level of protection, we have put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the law on data protection.

9. The legal basis for processing your data

9.1

(a) Legitimate interests:- Article 6(1)(f) of the GDPR states that we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

(b) Candidate data:- It is reasonable to expect that, as a Candidate, you are happy for us to collect and otherwise use your personal data to offer or provide our recruitment services to you, share that information with prospective employers and assess your skills against our vacancies. A prospective employer may also want to double check any information you've given us (such as the results from psychometric evaluations or skills tests) or to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with local laws. We need to do these things so that we can function as a

profit-making business, and to help you and other Candidates find employment. In order to ensure our business runs smoothly, so that we can carry on providing services to Candidates. We also need to use your data for our internal administrative activities, like payroll and invoicing where relevant. We have our own obligations under the law, which it is a legitimate interest of ours to insist on meeting. If we believe in good faith that it is necessary, we will therefore share your data in connection with crime detection, tax collection or actual or anticipated litigation.

(c) Prospective Candidate data:- We think it's reasonable to assume that you are looking for employment opportunities if you have posted your professional CV information on a job board or professional networking site, and therefore that you are happy for us to collect and otherwise use your personal data to decide whether we are able to offer or provide our recruitment services to you, and to contact you in respect of those services.

(d) Temporary worker data:- If we employ or engage you directly as a Temporary Worker, we may carry out the following processing activities and any other that are in our legitimate interests to carry out in order to meet our professional and/or legal obligations: (1) for our internal administrative purposes, such as facilitating payroll and invoicing; (2) determining the terms on which you work during your Temp Relationship; (3) keeping a record of start dates and duration of the length of assignments, hours works during assignments, and any promotions, salary rises or bonuses you are awarded; (4) giving or receiving feedback in relation to your assignment; and (5) to assist us with establishing, exercising or defending any legal claims.

(e) Client Data:- To ensure that we provide you with the best service possible, we store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations, meetings, registered jobs and placements. From time to time, we will also ask you to undertake a customer satisfaction survey. We deem these uses of your data to be necessary for our legitimate interests as an organisation providing various recruitment services to you.

(f) Supplier data:- We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our Suppliers. We also hold your financial details, so that we can pay you for your services. We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

(g) Data received from candidates and staff:- (1) If you have been put down by a Candidate or a prospective member of Staff as one of their referees, we use your personal data in order to contact you for a reference. We deem this to be necessary for our legitimate interests as an organisation offering recruitment services and employing people ourselves; (2) Where you are being asked to give a reference based on professional experience of a Candidate, and where we think that you may be interested in becoming a Client, we may also use your details to reach out to get in touch in that alternative capacity; (3) If a Candidate or Staff member has given us your details as an emergency contact, we will use these details to contact you in the case of an accident or emergency and is necessary for our legitimate interests.

9.2 Consent

(a) In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. This consent will be opt-in consent or soft opt-in consent. Article 4(11) of the GDPR states that (opt-in) consent is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her". This means that: (1) you have to give us your consent freely, without us putting you under any type of pressure; (2) you have to know what you are consenting to; (3) you should have control over which processing activities you consent to and which you don't; and (4) you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

(b) We will keep records of the consents that you have given in this way.

(c) You have the right to withdraw your consent to these activities at any time and can do so by emailing compliance@arrowerecruitment.com.

9.3 Legal Claims:- Sometimes it will be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity". This will arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

9.4 To fulfil our obligations under employment and social security legislation

(a) For some Candidates, Temporary Workers and individuals it will sometimes be necessary for us to process your sensitive/special category personal data. Article 9(2)(b) of the GDPR allows us to do this where the processing is "necessary for the purposes of carrying out the obligations and exercising [our or your] specific rights... in the field of employment and social security and social protection law", as long as this is allowed by law.

(b) We process Candidates' sensitive/special category personal data for the purpose of ensuring our compliance with our equal opportunities obligations where appropriate and in accordance with local law, (for example, for some Candidates during the course of the recruitment process). We will also process the sensitive/special category personal data of individuals connected with Candidates or Staff for other reasons, for example to allow the relevant Staff member to access certain benefits or employment rights.

(c) Temporary Workers directly engaged or employed by us, we process your special categories of personal data for the purpose of ensuring our compliance with our equal opportunities obligations where this in accordance with local law, but we may also process other elements of your special categories of personal data during the course of our Temp Relationship for other reasons. For example, where appropriate and in accordance with any local laws and requirements, we may also process your medical data to enable us to provide you with adequate support if you suffer from a health condition or disability, for example by sharing medical information about you with an occupational health specialist, in order to determine prognosis and return to work arrangements, and to assess your working capacity more generally. We may also need to process some health-related data to ensure appropriate adjustments can be made by us or our Clients during the continuance of the Temp Relationship.

9.5 Where it is necessary in order for us to carry out our obligations under a contract with you or to others, and to ensure that you are fulfilling your obligations to us.

(a) Article 6(1)(b) of the GDPR, which applies where processing of personal data "is necessary for the performance of a contract to which [you are] party or in order to take steps at [your] request ... prior to entering into a contract".

(b) We may use automated decision making to make decisions about you based on your personal data. We will only do this where this is necessary in order to fulfil a contract you have with us or one of our Clients, or where this is necessary in order to complete steps which must be taken before you can enter into such a contract.

(c) It is reasonable to assume that, as a Candidate, you are hoping to enter into an employment contract, and that by using our services you are asking us to take the necessary steps for this purpose. Such steps might include, for example, checking you meet certain requirements for a particular role. If the role is very popular, we may have to check the eligibility of a large number of potential Candidates – we may therefore use automated decision making to filter this pool of Candidates down to a more manageable number.

(d) In relation to the employment or engagement of Temporary Workers directly by us, prior to and during our Temp Relationship, we rely on this legal basis to collect and otherwise use your personal data to enable us to perform our part of our contract with you and our obligations to third parties, and to ensure that you are properly fulfilling your obligations to us. By way of example, we may process your bank account details and

name (and other verifying information) via payroll in order to pay you in accordance with your contract. Another example may be processing data for performance or behaviour management as part of our Temp Relationship.

9.6 Your personal data is necessary for us to meet our legal obligations

(a) In relation to the employment or engagement of Temporary Workers directly by us, as well as our obligations to you under our contract, we also have other legal obligations that we need to comply with. Article (6)(1)(c) of the GDPR states that we can process your personal data where this processing "is necessary for compliance with a legal obligation to which [we] are subject".

(b) An example of a legal obligation that we need to comply with is our obligation to co-operate with tax authorities, including providing details of your remuneration and tax paid.

10. Changes to our privacy policy

Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

11. Information about us

This privacy policy relates to Arrowe Recruitment Limited. We are a limited company registered in England and Wales under Company number 12080945. Our registered office address is Stanhope House, Mark Rake, Bromborough, Wirral, CH62 2DN and our main place of business is at Arrowe House, 1C Arrowe Park Road, Wirral, CH49 0UB. You can contact us by phone 0151 678 5549 or by email at: compliance@arrowerecruitment.com, or by post using the address as above.

Our data protection officer can be contacted at: compliance@arrowerecruitment.com or using the postal address below.

12. Any questions?

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to:

Data Protection Officer
Arrowe Recruitment Limited
Arrowe House
1C Arrowe Park Road
Upton
Wirral
CH49 0UB