

## **Transparency Policy**

Personal data, or personal information, means any information about an individual from which that person can be identified. We collect different information depending on your relationship with us.

This Transparency Policy provides information on the sources we use to obtain personal details and any relevant and proportionate way in which we may process your personal data, or personal information in line with the legitimate interest of our business.

### **Which information do we hold?**

The information gathered differs from person to person; the important personal data we aim to **collect, process or store** is:

#### **Individual Candidates & Prospects:**

##### **Which information:**

- We DO collect, process or store personal data such as: Name; Curriculum Vitae; Employer & previous employers, right to work documentation when required, Date of birth, Contact details, Telephone number, Email address, Work experience, Qualifications, Other personal data obtained or received by us in connection with your possible and actual work placements, Personal data associated with managing queries and complaints
- We DO NOT collect, process or store sensitive personal data such as your physical or mental health or condition, political opinions, religious or similar beliefs

##### **Why is this information collected?**

- This information is used to determine whether Individual Candidates & Prospects are relevant for certain job opportunities or not, which would be in mutual benefit to Clark Wood Limited's business interests.

#### **Individual Corporate Client Contacts:**

##### **Which information:**

- We DO collect, process or store personal data such as: Name; Employer; Contact details, Telephone number, Email address, other personal data obtained or received by us in connection with your possible and actual work vacancies and new constructive business relationships; Personal data associated with managing queries and complaints
- We DO NOT collect, process or store sensitive personal data such as your physical or mental health or condition, political opinions, religious or similar beliefs

##### **Why is this information collected?**

- This information is used to determine whether Individual Corporate Client Contacts require Clark Wood Limited's services, which would be in mutual benefit to Clark Wood Limited's business interests.

## **Lawful Basis for Processing**

Information we collect from you and about you and how our use complies with the law

*Consent: This means that you have given us your permission*

*Legitimate interests: Defined as an important part of our business model and enables us to carry out our business successfully - provided that there is no detriment to the individual*

| <b>Information: Personal data or Personal Information</b>   | <b>Activity: How we use your information</b>  | <b>Legal Basis: How we comply with the Law</b>   |
|---|---|--|
| Name, contact details, telephone number, email address, curriculum vitae, qualifications, employment & experience history | Provide our recruitment services to candidates or client contacts<br><br>Methods of getting in contact with the individuals | With your consent (where applicable) otherwise for the legitimate interest of promoting our business, provided that you have not asked us to stop sending you marketing. |
| Name, contact details, telephone number, email address, curriculum vitae, qualifications, employment & experience history | Manually profiling candidates, using the personal information to determine relevant vacancies.                              | With your consent (where applicable) otherwise for the legitimate interest of promoting our business, provided that you have not asked us to stop sending you marketing. |
| Name, contact details, telephone number, email address, curriculum vitae, qualifications, employment & experience history | Sending Personal data or Personal Information to clients in order to apply for jobs   | Consent  |
| Name, contact details, telephone number, email address, curriculum vitae, qualifications, employment & experience history | To provide you with occasional marketing information  | With your consent (where applicable) otherwise for the legitimate interest of promoting our business, provided that you have not asked us to stop sending you marketing. |

## **When & How Personal Data is Collected, Processed or Stored/ Retained**

### **Lawful Collection of Personal Data**

Personal data is only collected where:

- The data is collected for a lawful purpose directly related to the legitimate business interest and function or activity of Clark Wood Limited

- The collection of data is necessary for or directly related to that purpose
- The data is adequate but not excessive in relation to that purpose

### **Personal Data Collection**

We may collect personal data about you when:

- When you contact us directly over the telephone, email, complete a Clark Wood Limited registration form or provide any other information in connection with an application
- You apply directly to any Clark Wood Limited vacancies via a variety of job boards that we use
- In some cases, we will collect information about you from third parties such as job boards (e.g. Reed and other similar platforms)
- In some cases, we will collect information about you from third party social media platforms such as LinkedIn
- We receive any reference about you
- We receive any complaint or other information from or about you in the workplace
- You provide us with any additional information about you

### **Provision of services**

- Please note that it is mandatory for you to provide us with such personal data in order for us to be able to provide you with our services.
- Your personal data may be used in connection with:
  - Your actual, possible or potential work placement
  - Proactively approaching accounting firms and professional practices
  - Career guidance or management
  - Our assessment of your ongoing performance and prospects
  - Our identification of your training needs
  - Our management and resolution of any complaint, inquiry or investigation in which you are involved
  - Any insurance claim or proposal that requires disclosure of your personal or sensitive information
  - For research, development, business systems and infrastructure testing, and other business purposes to assist us in providing our services to you
  - Providing our services to our clients

### **Retention of Candidate Data:**

- We have the right to keep an individual's personal details until we are instructed that they no longer wish us to do so. We have a legitimate interest in keeping individuals' information on file as many candidates can be considered passive if not actively looking – this enables us to continue providing an effective and efficient recruitment service.
- We have on numerous previous occasions contacted individuals after periods of lapsed contact when potentially suitable positions have arisen in their locality.
- In the event that an individual asks for their contact details to be removed, we will do so immediately. Consultants must flag any such occurrences up to the directors who will take the action the request accordingly.
- Until such time that you wish to exercise your right to restrict our processing of your data we will continue to do so under the lawful basis of our legitimate interest to provide you with information on relevant opportunities, updates and industry news.

## **Management of personal data**

- At Clark Wood Limited, we train our staff to respect the confidentiality of customer information and the privacy of individuals. Clark Wood Limited regard breaches of your privacy very seriously and any breach will result in disciplinary action being taken, dependent upon severity.

## **How do we store & protect personal data?**

- Safeguarding the privacy of your personal data is important to us, whether you interact with us personally, by phone, mail, over the internet or other electronic medium.
- We hold personal data in a combination of secure cloud-based applications; web-based servers; Client Relationship Management database systems, secure computer storage facilities and paper-based files and other records, and take such steps as are reasonable in the circumstances to protect the personal data we hold from misuse, interference and loss, unauthorised access, modification or disclosure. We may need to maintain records for a significant period of time. However, when we consider data is no longer needed for the fulfilment of the purpose (including any directly related purpose) for which the data is or is to be used, we will remove any details that will identify you or we will securely destroy the records.

## **How do we keep personal data accurate & up to date?**

- Clark Wood Limited take reasonable steps to ensure that the personal information it holds and discloses is accurate up to date and complete. We recognise that personal data changes frequently with changes of address and other personal circumstances. We generally update your customer data over the telephone. Please advise your consultant when your personal details change.
- You can delete your personal information or unsubscribe for any form of contact by contacting us here at Clark Wood Limited.

## **Your Rights:**

You have the following rights:

- to be told what we are doing with your personal information. We do this by providing you with this transparency notice;
- to correct or update the personal information we hold about you: you can do this by emailing – [info@clark-wood.co.uk](mailto:info@clark-wood.co.uk)
- to object to the processing of your personal information;
- to request a copy of the personal information we hold about you;
- to ask us to delete the information that we hold about you where there is no good reason for us continuing to process it;
- to ask us to stop processing your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground;
- to ask us to restrict how we use your personal information for a period of time if you claim that it is inaccurate, and we want to verify the position or in some limited other circumstances;
- to ask us to send your personal information to another organisation in a computer-readable format;

- to complain to the Information Commissioner's office if you are unhappy with our use of your personal data: you can do this at <https://ico.org.uk/concerns>. Do contact us straight away if you consider that we are not handling your personal information properly, so we can try and sort the problem out.
- If we delete your personal information or restrict our use of it, we will not be able to provide our services to you.
- If you want to exercise any of your rights, please contact - [info@clark-wood.co.uk](mailto:info@clark-wood.co.uk). We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

### **Enquiries & Complaints**

- You can make enquiries, requests to access/delete or correct your information, or complain about alleged breaches to, or otherwise contact us on:

**Email:** [richard@clark-wood.co.uk](mailto:richard@clark-wood.co.uk)

**Address:** Clark Wood Limited, 10 Victoria Street, Bristol, BS1 6BN

- We aim to acknowledge receipt of all complaints within 10 working days and aim to resolve all complaints within 40 days. This may not be possible in all circumstances depending on the contents of the complaint. In this situation, we will respond to your complaint in a reasonable time.

### **Feedback**

- Please also contact us via the contact details above to provide any feedback, we are always keen to hear of our candidate's and client's views on our service. We are always aiming to improve our service