

Mature Accountants – Data Privacy as of May 2018

Mature Accountants Limited (“MA”) are committed to protecting and respecting your privacy.

This notice together with our Website Terms of Use and any other documents sets out the basis on which any personal data Mature Accountants collect from you, or that you provide to us, will be processed by us.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) (“GDPR”) is a new regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Your rights under GDPR are set out in this notice and apply from **25 May 2018**.

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

For the purposes of data protection legislation in force from time to time the Data Controller is Mature Accountants Ltd, 29 Criffin Road, Burton Joyce, Nottingham, NG145FB

Our nominated Data Protection Officer is [Nils Lloyd-Penny](#) who is also a Director of the business as state on the Companies House website.

Who Mature Accountants are and what we do

MA are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). MA 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 clients
- Supplier contacts to support our services
- Our employees and associate workers.

MA 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 visiting our website <https://www.matureaccountants.com> (“Website”) or by corresponding with us by phone, e-mail, SMS or otherwise. It includes information you provide when you:

- Register as a candidate to enter our database
- Register a new vacancy
- Apply for jobs – note that you must have registered with us to do this
- Refer colleagues or friends as part of our referral program
- Enter a competition or take part in a survey
- Register to attend an event MA organise
- Participate via social media functions on our Website
- Report a problem with our Website.

MA stores job applicant data in the form of personal information about individuals such as name, email address, and CV etc.. as well as documents such as membership certification. All of this data is under the control of the applicant having been entered by them. Personal data for each applicant is accessible at any time and editable by the user and includes the ability to delete their data. Data is encrypted for transmission.

Information MA collect about you when you visit our Website

When you visit our Website MA will automatically collect the following information:

Technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, operating system and platform.

Information about your visit, including the full Uniform Resource Locators (URL) of each page visited, clickstream to and through our Website including date and time, jobs visited and searched for, download errors, length of visits to pages, and any information submitted through forms.

Information MA obtain from other sources

This is information MA obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card and personal recommendations. In this case MA will inform you, of any reason to use your personal data e.g to alert you to a vacancy that may be suitable.

Purposes of the processing and the legal basis for the processing

MA use information held about you in the following ways:

To carry out our obligations arising from any contracts MA intend to enter into or have entered into between you and MA to provide you with the information and services that you request from us or MA 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 services or jobs that MA offer that are similar to those that you have already been provided with or enquired about.

The core service that MA offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary or permanent recruitment. 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 interests, described in more detail below, although MA will also rely on contract, legal obligation and consent for specific uses of data.

MA will rely on any existing contract if MA 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.

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

MA will rely on your consent for particular uses of your data and you will be asked for MA express consent, if legally required e.g. when gaining your permission to introduce you to a client (if you are a candidate).

Our Legitimate Interest

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

As a recruitment business and recruitment agency MA 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 and essential part of this process.

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

To maintain, expand and develop our business MA need to record the personal data of prospective candidates and client contacts.

Consent

Should MA want or need to rely on consent to lawfully process your data MA will request your consent orally, by email, by SMS or by completing an online process for the specific activity (e.g. when registering a vacancy or as a candidate or when you apply for a job) when MA will require your consent for and to 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 MA will make of your data:

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

MA will use this information:

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

MA do not undertake automated decision making or profiling. MA 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. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website.

By using our Website you are agreeing to the use of cookies as described.

Disclosure of your information inside and outside of the EEA

MA will share your personal information with:

Any member of our company both in the EEA and outside of the EEA.

Selected third parties including:

- clients (or a nominated party acting on behalf of our clients) for the purpose of introducing candidates to them
- candidates for the purpose of discussing job opportunities to them, the arranging of interviews and engagements
- clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract MA enter into with them or you
- subcontractors including email marketing specialists, event organisers, payment and other financial service providers
- MA may make use of the personal data MA have collected from you to enable us to display our adverts to the correct targeted audience
- analytics and search engine providers that assist us in the improvement and optimisation of our Website
- 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.

MA will disclose your personal information to third parties:

- In the event that MA sell or buy any business or assets, in which case MA will disclose your personal data to the prospective seller or buyer of such business or assets
- If MA 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 MA 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 Website Terms of Use

and other agreements; or to protect the rights, property, or safety of MA, 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 MA store and process your personal data

The data that MA collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. MA 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 on our secure servers. Where MA have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential. MA ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although MA will do our best to protect your personal data, MA cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk. Once MA have received your information, MA will use strict procedures and security features to try to prevent unauthorised access.

Retention of your data

MA will retain your personal data for as long as necessary in order to provide the recruitment service to you and for the purposes of satisfying any legal, accounting, regulatory or reporting requirements

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

- prior to making an introduction MA check that MA have accurate information about you
- MA keep in touch with you so you can let us know of changes to your personal data
- MA make use of external websites (e.g. LinkedIn) to verify the information about you.

The criteria MA use to determine whether MA should retain your personal data includes:

- the nature of the personal data
- its perceived accuracy
- our legal obligations
- whether MA have been active with you as part of our general recruitment service (e.g. discussing roles with you, arranging interviews or placing you in a new role)
- our recruitment expertise and knowledge of the industry by country, sector and job role

MA 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 systems. MA may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that MA 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.

Your rights

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

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, please note that these websites have their own privacy policies and that MA 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 MA hold about you. This enables you to have any incomplete or inaccurate information MA 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 MA 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 MA are processing your personal information for direct marketing purposes
- 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 1998 and the GDPR give you the right to access information held about you. MA also encourage you to contact us to ensure your data is accurate and complete.

MA stores user data that can be edited and deleted by both the system administrator and the individual user. This gives full rights to the client and user: of access; rectification; erasure; restrict processing; data portability; and to object; and exclude automated decision-making including profiling.

Changes to our privacy notice

Any changes MA 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 The Data Protection Manager, 29 Crifin Road, Burton Joyce, Nottingham, NG145FB or via email to admin@matureaccountants.com