

Data Protection and Privacy notice

Coby Philips is fully committed towards protecting the privacy of its clients, employee's and website visitors. The Coby Philips Privacy Policy explains our information practices and the various measures taken to protect your privacy and security with specific attention to any personal data we may have access too.

The Coby Philips Privacy Policy is fully compliant with the Data Protection Act 1998 and the Directive on Privacy and Electronic Communications 2002/58/EC, and other relevant business and personal legislation as well as The General Data Protection Regulation (GDPR) (EU) 2016/679.

The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company has collected your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. The legal bases we rely upon to offer these services to you are:

- Consent
- Legitimate interest
- Legal obligation
- Contractual obligation

b. Categories of data

The Company has collected the following personal data on you:

Personal data:

- Contact details, including telephone number, email address and postal address
- Experience, training and qualifications
- CV
- National insurance number
- Bank account details, payroll records and tax status information
- The start and end date and details of any assignment you have through us.

- The dates and outcome of any client interviews you have through us.
- Employment records (including job titles, work history, working hours, training records and professional memberships, P45 and P60).
- Any other relevant personal data

Sensitive personal data:

- Disability/criminal conviction

CLIENT DATA: If you are a Coby Philips customer, we need to collect and use information about you, or individuals at your organisation, in the course of providing you services such as: (i) finding candidates who are the right fit for you or your organisation; (ii) providing you with a Managed Service Provider ("MSP") programme (or assisting another organisation to do so); (iii) providing you with Recruitment Process Outsourcing ("RPO") services (or assisting another organisation to do so); and/or (iv) notifying you of content published by Coby Philips which is likely to be relevant and useful to you (for example our Global Skills Index).

SUPPLIER DATA: We need a small amount of information from our Suppliers to ensure that things run smoothly. We need contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us).

c. Legitimate interest

Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- To assist with work finding services

d. Recipient/s of data

The Company will process your personal data and/or sensitive personal data with the following recipients:

- To our clients listed on our database to help assist with work finding services

2. Data retention

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time.

The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

Where the Company has obtained your consent to process your [personal/[and] sensitive personal data/specify which personal data], we will do so in line with our retention policy [(a copy can be obtained upon request)]. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your [personal data/[and] sensitive personal] data].

3. Data Security

The company will treat all personal data as confidential and ensure any data processors take the security of our clients data seriously. This involves where relevant

- AES 256 bit Encrypted offsite backups
- Centralised directory user and administrative control
- Fully audited change of access records
- Strict confidentiality and information security policies including staff education
- Intrusion prevention and alerting
- Client and server Operating system updates applied within 1 month of release
- Comprehensive approach to management of non-conformances and security breaches

We wish to hear from you if you suspect any data security problems and are committed to mitigate any risks as soon as practically possible. Please contact: Nicola Milner, 4 Christopher Street, LONDON, EC2A 2BS or GDPR@cobyphilips.co.uk

4. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your [personal data/[and]sensitive personal data] you have the right to withdraw that consent at any time by contacting [Nicola Milner who handles data protection issues

5. Source of the personal data

The Company sourced your personal data/sensitive personal data by the following means:

- Through Job boards where you have loaded your details for work services

- Directly from yourself

This information came from a publicly accessible source.

6. Complaints or subject access requests

If you wish to contact Coby Philips about this privacy notice, discuss any of the procedures set out above or make a subject access request please contact: Nicola Milner, 4 Christopher Street, LONDON, EC2A 2BS or GDPR@cobyphilips.co.uk