

PRIVACY POLICY

The implementation of GDPR on 25 May 2018, replacing existing data privacy law, will give more rights to you as an individual and more obligations to organisations holding your personal data. One of the rights of individuals is a right to be informed, which means we have to give you even more information than we do now about the way in which we use, share and store your personal information. Our new privacy notice will provide you with information about how you can access this information, along with information about the increased rights you have in relation to the information we many hold about you and the legal basis on which we are using it.

How may we use your information?

This privacy notice tells you what to expect when we collect personal information. It applies to information we collect about:

- Visitors to our websites
- Use of Cookies
- People who Contact Us e.g. Call, Email, Social Media, or request a publication
- People who use our services,
- Associates, Job applicants, current and former employees
- Your Rights
- Complaints or queries
- Access to personal information
- Disclosure of personal information
- Legal basis for processing personal information
- Links to other websites
- Changes to this privacy notice
- How to contact us

Visitors to our websites

When someone visits one of our websites including <u>www.ssfbusinessconsulting.</u>com or <u>http://personalassistants.ssfbusinessconsulting.com</u>, we use a third-party website hosting service to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Ipage to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Use of cookies by the ICO

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate



information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual. We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our Site and to deliver a better and more personalised service. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our Site.

People who contact Us

If you contact us we may collect and process your information in order to provide you with the information, support, Advice or Service that you have requested as follows:

People who call us

When you call anyone at SSF Business Consulting we do not retain any information from the calls or record them.

People who email us

We use McAfee anti-virus software to scan and monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law. We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government requirements. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

People who request our Newsletter or Articles

If you sign up for a newsletter or request articles or further information we currently provide this to you ourselves We do not currently use a third-party provider, to deliver our newsletters or articles. We gather statistics around email opening and website clicks using industry standard technologies to help us monitor and improve our newsletter. For more information, please see <u>ipage privacy notice</u>

People who contact us via social media

If you contact us via social media, we will receive an email which contains your name, email address, company name, phone number and the contents within the additional details field if appropriate. Any private or direct messages that you send to us will not be shared with any other organisations and is only used for the purpose for which it is intended. If you have requested specific information or have requested a call back or additional information about our services, the information that you have provided will only be used for this purpose.

People who use our 'Contact Us' service

If you use the 'Contact Us' service we will receive an email which contains your name, email address, company name, phone number and the contents within the additional details field. This information will not be shared with any other organisations and is only used for the purpose for which it is intended. If you have requested specific information or have requested a call back or additional information about our services, the information that you have provided will only be used for this purpose.



People who use our Services

SSF Business Consulting offers various services and resources relating to Business Transformation and Organisational Design Changes; Employment Law and HR Consultancy Services; and Leadership Development and People Management Training, and Personal Assistant and Executive Assistant Services. If we use third-parties to deal with any direct marketing campaigns, but they are only allowed to use the information to send out the publications that we have specifically requested. Currently we do not use a third party to deal with any publication requests, any requests for information are only provided directly by us.

We have to hold the details of the people who have requested information or a service in order to provide that information or service. However, we only use these details to provide the service that the person has requested and for other closely related purposes. For example, we might use information about people who have requested a publication to carry out a survey to find out if they are happy with the level of service they received. When people do contact us, use our services or have a contract for service provisions, they can cancel their contract by providing the relevant notice for termination subject to the terms of their agreement. When people do subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this. Where the personal information is not processed on behalf of a client, the data controller of your personal information shall be SSF Business Consulting.

We may require the recording of data relating to People Management and Organisational Design Changes for and on behalf of our clients and their employees. In these cases, SSF Business Consulting is acting as a Data Processor on behalf of our clients. For more information, please speak to your employer/the relevant Data Controller. SSF Business Consulting shall be classed as a Data Controller where deciding the manner in which data is processed when looking to meet our contractual obligations with Clients, for example where selecting third party suppliers to support the service provision requirements of our clients.

Personal information that we collect from you, or from a client relating to you, will be retained where we have an ongoing legitimate business need to do so (for example, to provide you or our clients with a service or to comply with statutory or contractual requirements such as legal, tax or accounting requirements). In the event that we do carry out any targeted marketing campaigns, email addresses may be used for targeted advertising campaigns only which can include direct emails and targeted advertisements through social media platforms such as LinkedIn and Facebook.

Associates, Job applicants, current and former employees

SSF Business Consulting is the data controller for the information you provide during any recruitment or engagement process; or any ongoing association with the business, unless otherwise stated. If you have any queries about this process or how we handle your information, please contact us using the details at the end of this document.

What will we do with the information you provide to us?

All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary We will not share any of the information that you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European



Economic Area. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format. We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

What information do we ask for, and why?

We will only collect the specific information that we need in order to fulfil our stated purposes and will not retain it for longer than is necessary. The information we ask for is used to assess your suitability for any employment or Associate opportunities. You don't have to provide what we ask for but it might affect your application if you don't.

Application stage

We will ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the position you have applied for. Our team will have access to all of this information to assess your suitability. You will also be asked to provide equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This equality information will not be made available to any staff outside of our management or recruitment team, including hiring managers, in a way which can identify you. Any information that you do provide, will be used only to produce and monitor equal opportunities statistics.

Shortlisting

Our hiring managers or third-party partners will shortlist applications for interview. If we use any third-party partners to assist with the recruitment process you will be informed of this in advance and at the point of advertising if appropriate. Hiring managers will not be provided with your name or contact details or with your equal opportunities information if you have provided it.

<u>Assessments</u>

We might ask you to participate in an assessment process; complete tests or occupational personality profile questionnaires; and/or to attend an interview – or a combination of these assessment methods. During this process information will be generated by you and by us. For example, you might complete a written test or we might take interview notes. This information is held by SSF Business Consulting. If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of six months. If you say yes, we would proactively contact you should any further suitable vacancies arise.

Conditional offer

If you are successful we may make you a conditional offer of employment and we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

• Proof of your identity – you will be asked to attend our office with original documents, we will take copies.



- Proof of your qualifications you will be asked to attend our office with original documents, we will take copies.
- You will be asked to complete a criminal records declaration to declare any unspent convictions.
- For some positions it may be necessary to provide your email address to a third party or statutory or Government Service who will contact you to complete an application for a Basic Criminal Record check via the Disclosure and Barring Service, or Access NI, which will verify your declaration of unspent convictions.
- We will contact your referees, using the details you provide in your application process, directly to obtain references
- We may also ask you to complete a questionnaire about your health. This is to establish your fitness to work.

If we make a final offer, we will also ask you for the following:

- Bank details to process salary payments
- Emergency contact details so we know who to contact in case you have an emergency at work
- Pension scheme provider so we can send you a questionnaire to determine whether you are eligible to join a previous scheme.

Post start date

Some positions or Associate Contracts may require a higher level of security clearance – this will be clear prior to or during the assessment process. If this is the case, then you will be asked to submit additional relevant information in order to review your suitability for the role or how you perform your duties. All employees or Associates must declare any potential conflicts of interest, or if they are active within a political party. All declarations of this nature will be held on the Associate or employee personnel file.

Use of data processors

Data processors are third parties who provide elements of our recruitment service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

How long is the information retained for?

If you are successful, the information you provide during the application process will be retained by us as part of your employee or Associate file for the duration of your Contract with SSF Business Consulting plus 6 years following the end of your employment or Associate Contract with us. This includes your criminal records declaration, fitness to work, records of any security checks and references.

If you are unsuccessful at any stage of the recruitment or engagement process, the information you have provided until that point will be retained for 6 months from the closure of the campaign. Information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the campaign. Equal opportunities information is retained for 6 months following the closure of the campaign whether you are successful or not.



How we make decisions about recruitment?

Final recruitment decisions are made by hiring managers and members of our senior management or recruitment team. All of the information gathered during the application process is taken into account. You are able to ask about decisions made about your application by speaking to your contact within our recruitment team or by emailing info@ssfbusinessconsulting.com

Your rights

Under the Data Protection Act 1998, you have rights as an individual which you can exercise in relation to the information we hold about you. You can read more about these rights here – <u>https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/</u>

Complaints or Queries

SSF Business Consulting tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints that we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate, or that there has been any potential breach. We would also welcome any suggestions for improving our procedures. This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of SSF Business Consulting's data collection and use of personal information. However, we are happy to provide any additional information or explanation needed as requested. Any requests for this should be sent to the address below.

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information that we collect in order to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We may have to disclose the complainant's identity to whoever the complaint is about, where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis. We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle. Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent related issues; and to check on the level of service we provide.

If you want to make a complaint about the way we have processed your personal information, you can contact us in their capacity as the statutory body which oversees data protection law – <u>www.ico.org.uk/concerns</u>



Access to personal information

SSF Business Consulting tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to the SSF Business Consulting for any personal information we may hold you need to put the request in writing addressing it to our address below If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone. If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting the us at the address below.

Disclosure of personal information

In many circumstances we will not disclose personal data without consent, unless legally obliged to do or as part of contractual obligations with our customers (where you are a party to the agreement or service) or statutory bodies.

We may disclose your personal information to the following categories of recipients:

- to third party services providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal information for purposes that are described in this Privacy Policy or notified to you when we collect your personal information.
- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy;
- to enforce or apply our Terms of Service or other agreements or to protect SSF Business Consulting and its customers (including with other companies and organisations for the purposes of fraud protection and credit risk reduction)
- to any other person where appropriate with your consent.

Legal basis for processing personal information

If you are a visitor from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal



information from you only where we have your consent to do so, where we need the personal information to perform a contract with/involving you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contact with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are. If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "How to contact us" heading below.

Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

Changes to this privacy notice

We keep our privacy notice under regular review and this privacy notice was last updated in January 2019.

How to contact us

If you want to request information about our privacy policy you can <u>email us</u> at <u>info@ssfbusinessconsulting.com</u> or write to:

Data Protection Officer SSF Business Consulting Ltd Cranmore Place Cranmore Drive Solihull West Midlands B90 4RZ UK, England