

## Stephen Bell Associates: Privacy Policy

Stephen Bell Associates Limited (“the Company”) is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data so that it can provide these services – in doing so, the Company acts as a data controller. The company is registered as a data controller under the UK Data Protection Act, registration reference ZA340934 and we will comply with the General Data Protection Regulation (GDPR). By requesting or using the Company’s services, you accept and consent to the Company’s use of your personal data as outlined in this policy.

You may give your personal details to the Company directly, or via our website, or we may collect them from another source such as a job advertisement. 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 this policy.

### 1. Collection and use of personal data

#### a. Purpose of processing

The Company will collect and process your personal data for the purposes of providing you with work-finding services. The legal basis we rely upon to offer these services to you is legitimate interest. The Company must process personal data so that it can provide these services to you as efficiently and securely as possible.

#### b. Recipients of data

In order to provide work-finding services, we may need to share your information with other organisations. Types of organisations may include:

- Prospective employers, including the Company’s clients and prospective clients who may retain such data for future recruitment purposes.
- External vetting agencies such as those who provide credit history and criminal record checks.
- Third parties who provide services to the Company such as IT Consultants and database specialists.

### 2. Overseas Transfers

The Company may transfer only the information you provide to us to countries outside the European Economic Area (‘EEA’) for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

### 3. 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.

#### **4. Security**

The Company is committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure we have put in place suitable security and managerial procedures to protect all personal data held. However, you should be aware that the use of the Internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal data which is transferred from you or to you via the Internet.

#### **5. Keeping your personal data up to date**

The Company will take reasonable steps to ensure that your personal data is up to date, and may request updates from you from time to time. However, it is your responsibility to provide us with any changes you feel may be relevant to us, and to provide us with accurate information. If requested in writing by you, we will delete all information on you from our records, but please note that will mean that we will be unable to contact you in the future about relevant roles or opportunities.

#### **6. Cookies**

The Company's website uses cookies to collect information about you, including some personal data. "Cookies" are small data files which are placed onto your device via your web browser when you visit the website. Any personal data collected by those cookies will be used in accordance with this privacy policy.

#### **7. 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.

#### **8. How to contact us**

If you wish to update your personal data, request a copy of what data the Company holds about you or request that your personal data is deleted, please contact: [dataprotection@stephenbellassociates.com](mailto:dataprotection@stephenbellassociates.com) or write to us at the below address.

Stephen Bell Associates Limited  
85 Gresham Street, London EC2V 7NQ  
T: 0203 709 4126

## 9. Complaints or queries

If you wish to complain about this privacy policy or any of the procedures set out in it please contact: [dataprotection@stephenbellassociates.com](mailto:dataprotection@stephenbellassociates.com)

You also have the right to raise concerns with the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.