

## FOR ALL CANDIDATES WHO CONTACT DRAKE MEDOX VIA DIRECT APPLICATION.

|                               |                             |
|-------------------------------|-----------------------------|
| <b>COMPANY NAME</b>           | Drake Medox ('the Company') |
| <b>PRIVACY OFFICE CONTACT</b> | privacy@drakeintl.co.uk     |
| <b>POLICY DATE</b>            | 1 February 2021             |
| <b>VERSION</b>                | 02                          |

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.

When you provide your personal data to the Company 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 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 basis we rely upon to provide these services to you is:

- Legitimate interest - for the Company to provide you with work-finding services

#### b. Categories of data

The Company collects the following personal data:

##### Personal Data

- Name
- Contact details, including telephone number, email address and postal address
- Experience, training and qualifications
- CV

##### Sensitive Personal Data

- Disability / health condition relevant to the role you are seeking
- Criminal conviction

#### c. Recipient/s of data

The Company may share your personal data with our outsourced service providers and consultants to facilitate the provision of our services. The Company will not share your personal data with any other third party (for example, any client of the Company) without your consent.

#### d. Statutory/contractual requirement

Your personal data is not required as part of a statutory and/or contractual requirement, and/or a requirement necessary to enter into a contract.

## e. International data transfers

We may transfer your personal data to a third party in countries outside the EU for further processing in accordance with the purposes set out in this policy. In particular, your personal data may be transferred to our outsourced service providers and consultants located abroad. In these circumstances we will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisation, contractual or other lawful means.

## 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 a legitimate interest in processing your personal/sensitive personal data, we will do so only in line with our retention policy (a copy of which is available upon request). Upon expiry of that period the Company will delete your personal data/sensitive personal data. Following deletion of your personal data, you may request work seeking services, but you may re-enter your personal data at that time.

## 3. 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/sensitive personal data, you have the right to withdraw that consent at any time by contacting our Privacy Office at [privacy@drakeintl.co.uk](mailto:privacy@drakeintl.co.uk)

## 4. Complaints or Queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: [privacy@drakeintl.co.uk](mailto:privacy@drakeintl.co.uk)

You also have the right to raise concerns with 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.