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Privacy Notice

Reed Specialist Recruitment Limited ("Reed") is part of the Reed Group of companies. Reed acts as both an employment agency and an employment business, introducing job seekers to hirers for permanent and temporary vacancies respectively.

This document explains how we use the personal data we collect about you when you register with Reed as a job seeker.

Registration for job seekers is free, so there is no formal contract between us unless you are engaged as a temporary worker. In that case you will either be engaged directly by a Reed Group company on a contract for services or engaged as a limited company contractor, depending on your preference.

Following your registration and in order to put you forward for vacancies, it will be necessary to process your personal data in the manner set out below. In some cases, if you do not provide us with the personal data we ask for, we may not be able to provide you with our services.

In certain situations, we may also ask you to supply limited sensitive or special category personal data relating to criminal records or your health ("sensitive personal data"). We will only ask for sensitive personal data when it is needed to comply with a statutory obligation or to ensure that any employment rights are respected.

What information do we collect about you?

Information provided by you:

We collect personal data provided by you when you register with Reed. That personal data is needed to provide you with the recruitment services we deliver.

That personal data includes (but is not limited to) your name, contact details, work history, employment preferences, references and the usual information contained on a CV. We will also ask for and keep copies of your CV and, where appropriate, proof of your eligibility to work in accordance with our legal obligations. For nationals of certain countries, we are able to perform digital identity checks via an online application hosted by a third-party service provider (who acts as our data processor), OCR Labs. Where we are able to perform these digital checks, we will ask your

consent and provide you with more information in the consent request form. If you are directly engaged by a Reed Group company, we will also ask you to provide us with the information needed to ensure that you are paid appropriately (e.g. your bank details and National Insurance Number).

We may also ask if you need any reasonable adjustments to be made in connection with the recruitment process or application for a particular role.

Where we are legally required to do so, we may also ask for details of any criminal offences and seek an up-to-date criminal records check.

We will keep details of roles that you obtain through Reed and copies of correspondence sent to you and to any hirer in connection with such roles.

Device information:

If you use our website or interact with emails that we send you, we also collect personal data from those interactions. We collect personal data such as your IP address and other data about your device, which we need to provide our online content to you.

Third parties:

We also obtain personal data about you from third parties, including (but not limited to):

- Clients to whom we provided your CV and who provided feedback to us;
- Former employers and referees who provide references;
- The Disclosing and Barring Service, Disclosure Scotland, Access Northern Ireland, or overseas police forces, if we need to obtain details of criminal convictions;
- Credit reference agencies, where we need to check your financial standing;
- Publicly available sources such as social media sites and LinkedIn, to enhance the information we hold in order to assist you better with finding suitable roles.

Legal grounds for processing your personal data:

Under the Data Protection Act 2018, we rely on the following legal grounds to process your personal data:

- a) Our legitimate interests – (including but not limited to):
 - Provision of our operations in an efficient manner;
 - Provision of our services to you;
 - Optimizing the performance of our website and user experience;
 - Provision of information about our services;
 - Responding to requests and enquiries.
- b) Performing a contract – where in order to perform our obligations under a contract with you (or taking of steps to enter into the contract)
- c) Compliance with legal obligation – where we need to process your personal data in order to comply with a legal or regulatory obligation
- d) Consent. In some circumstances we will ask you for your consent to process your personal data. When we process your personal data based on your consent, you have the right to withdraw such consent at any time.

What do we do with your personal data?

As a Job Seeker, we will use your personal data to:

- provide you with our recruitment services,
- manage your account,
- send you information about job opportunities, industry reports and insights, events, promotions and competitions,
- enable you to apply for jobs,
- enable us to monitor equality and diversity,
- Provide you information with the aim of helping you find a suitable role (e.g. interviewing and salary advice)
- As a Reed temporary worker, we will also use your personal data to:
 - provide you with access to our sick pay scheme, in order to help to ensure your health and safety at work (where appropriate)
 - provide HMRC with your details when we make any payments to you to comply with legislation

Your personal data (including references), and where appropriate sensitive personal data may be provided to prospective employers, hirers and their appointed agents or processors, who will use it for processing your application, for personnel administration, additional screening checks and for inspecting our files (for audit purposes) where they are entitled to do so.

Reed is passionate about promoting equality, diversity, inclusion and belonging across all workplaces and, as such, we work with our clients to track recruitment processes and seek improvements, wherever we can. To do this successfully, we ask you to provide us with consent to process your diversity data (“Diversity Data”), Reed will only process the Diversity Data listed in the Consent Form and for the purposes explained in the Consent Form. Since we use consent as the lawful basis for the processing of Diversity Data, you have the right to change your mind at any time and ask us to delete your Diversity Data. You can do so by emailing compliance.escalations@reed.com explaining the wish to withdraw your consent. We will then permanently delete all your Diversity Data from our systems.

Sharing your personal data:

We do not share your personal data with third parties, except where it is necessary to do so to provide you with our recruitment services and as set out in this Privacy Notice.

We may share your personal data with other Reed Group companies to provide you with our full range of recruitment services. The companies we may share your data with are Reed Staffing Services Limited, which engages our temporary workers. Your personal data and sensitive personal data will only be shared with those companies to the extent that it is necessary. For example, the personal data of job seekers engaged as limited company contractors will not be shared with Reed Staffing Services Limited.

If you sign up to Reed Discount Club and provide us with consent to do so, we will share your personal data with the provider of this club, Reward Gateway UK Limited. The personal data categories we will share with Reward Gateway UK Limited are your first name, surname, email address and payroll number. This data will be used by Reward Gateway UK Limited to provide you with their services which include discounts on various products. Reward Gateway UK Limited will act as data controller in relation to the personal data we share with them.

You have the right to withdraw such consent at any time. You can do this by contacting us using the details in the Contact section below.

We may also share your personal data with third party service providers who assist us in carrying out our business activities. These third parties act as our data processors and are bound by strict contractual provisions to only process your personal data under our instructions and for the limited purposes we permit them. These third parties include (but are not limited to) our accountants; auditors; external legal advisors; external IT providers; support and hosting service providers; printing, advertising, marketing and market research and analysis service providers, technical engineers, data storage and cloud providers and all other outsourced service providers (such as communication providers) that assist us in the provision of our services.

We may also share your personal data with courts, tribunals, regulators and other governmental and public authorities (such as the police or tax authorities) to: (i) allow us to pursue legal remedies, (ii) to enforce our terms and conditions and protect our operations, (iii) to comply with legal process, (iv) to comply with applicable law, and (v) to respond to requests from public and governmental bodies.

How long we keep your personal data for

We will keep your personal data (in accordance with our data retention and destruction policy) for as long as we need to in order to fulfil the purpose we collected it for. This may be for an ongoing purpose, e.g., we will retain your personal data for the duration of our business relationship with you and beyond, as we often support candidates with job placements over many years and potentially throughout their careers.

We keep some personal data for longer than others. To determine the appropriate retention period for personal data, we consider factors such as the purposes for which we process your personal data, including any legal, regulatory, accounting and reporting obligations, the nature and amount of personal data that we hold about you, and the potential risk of harm to you from unauthorised use or disclosure of your personal data.

However, you retain control over your personal data and may instruct us to stop looking for work for you at any time. When instructed by you, we will remove your records from our database unless we are required to keep it for legal reasons.

Marketing

You can opt out of receiving marketing communication from us at any time by using the links included in the emails you receive from us. We keep a record, if you ask us not to send you marketing communications, so that we can respect your request.

Please note that even if you unsubscribe from receiving marketing material, we still may contact you if required.

We also run targeted and relevant banner advertising on our website and within our social network sites to promote to you jobs and content we believe will be of interest. We target these promotional ads based on your previous interactions with our website, emails, and through your engagement with our consultants.

Data transfers

Your personal data is stored on servers in the European Economic Area and it is transferred outside that area if you ask us to assist you in obtaining work outside the EEA, in which case it will be made available to the appropriate Reed office overseas and to prospective employers in the relevant territories.

We engage a third party, IMS to assist us with certain administrative functions in relation to the recruitment services we provide. IMS is based in India and act as our data processor. As such, your data may be transferred to India for processing by IMS. To ensure your personal data receives an adequate level of protection in India, Reed has entered into the necessary and approved agreements with IMS.

If your personal data is transferred to any other third party service providers outside the EEA, we will ensure that suitable safeguards are in place for example, by using approved agreements. We will provide you with details of such safeguards upon request.

Access to your personal data, data portability, erasure and correction:

You have the right to request a copy of the personal data that we hold about you. If you would like a copy of some or all of your personal information please email us at compliance.escalations@reed.com.

We want to make sure that your personal data is accurate and up to date and are happy to remove or amend any information you think is inaccurate.

In relation to the personal data we process in relation to the Reed Discount Club as well as Diversity Data, you have the right to receive such personal data in a structured, commonly used and machine-readable format in order to provide it to a third party organisation. We are however unable to guarantee technical compatibility with a third-party organisation's systems.

You also have the right to cease receiving our services at any time and have us delete all of your personal data, unless we are in the process of responding to any complaint or we are required to keep it for legal reasons.

Changes to our Privacy Notice

We keep this document under regular review and we place any updates on this webpage. This statement was last updated on 09 September 2022.

How to contact us

Please contact us if you have any questions about this statement or information we hold about you:

by email **compliance.escalations@reed.com** ;

or write to us at **Data Protection Officer, Reed Specialist Recruitment Limited, Academy Court, 94 Chancery Lane, London, WC2A 1DT.**

You also have the right to raise any concerns about our processing of your personal data with the **Office of the Information Commissioner (ICO)**, details of which are available at: **<https://ico.org.uk>**