

Privacy Policy

Tudor Stride Limited

1. Introduction

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a new regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The GDPR aims to harmonise data protection legislation across the European Union, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Tudor Stride Limited is, for the purposes of data protection legislation in force now and from time to time, the data controller (“Controller”) and is therefore responsible for your personal data. Tudor Stride Limited may use the services of third parties to process or store data but will, in such circumstances, always remain responsible for the personal data we have collected.

This Privacy Policy documents our approach towards meeting the requirements of the GDPR, as described in more detail below.

Our nominated Data Protection Representative (“DPR”) is Mr. Matthew Stride who can be contacted using the details provided at the end of this privacy policy.

2. Your rights under the GDPR

The GDPR provides you with a number of rights, as described below:

- **Your ability to request access** to your personal information held by us
- Your right to **request a correction** of your personal information that we hold
- Your right to **request erasure** of your personal information
- Your ability to **object to processing** of your personal information (since we are relying on legitimate interest to process your personal information)
- Your right to object to direct marketing activities
- Your ability to **make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner’s Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

Please contact the DPR (see details provided at the end of this Privacy Policy) to exercise any of the rights set out above.

3. Our approach to meeting the requirements of the GDPR

Tudor Stride Limited is committed to protecting and respecting your privacy and this Privacy Policy describes how we collect, use and process your personal data. Personal data may be collected when you visit our website, send us your CV or if we are working with you as a candidate to find an employment opportunity or as an employer to fill a job vacancy. This Privacy Policy also applies to any continuing relationship between Tudor Stride Limited and anyone to whom we provide a service or from whom we receive a service. Specifically, this Privacy Policy applies to the personal data of our:

- **Candidates:** being applicants for roles that have been advertised or promoted by us, including permanent, part-time and temporary positions with employers who are our clients (“Clients”) as well as people who have sent us their CV for review whether or not in relation to a specific advertised vacancy.
- **Clients:** being our customers to whom we provide or to whom we market our recruitment services in the course of our business. Clients are typically employers who are looking to recruit staff.
- **Suppliers:** anyone who supplies their services to us in the course of performing their business.

4. What is the lawful basis for the processing personal data?

Our lawful basis for processing personal data is one of ‘legitimate interest’. We have selected this lawful basis given that the processing of your personal data will be necessary for the performance of our business and delivery of services to you. We may also rely, in certain circumstances, on the lawful basis of ‘contract’ for specific uses of data.

Why has ‘legitimate interest’ been chosen?

In collecting, processing and retaining your personal data, we consider ‘legitimate interest’ as the most suitable basis for the following reasons:

- In order to provide our services we must maintain a comprehensive database of information, much of which could be considered personal data, for both our Candidates and Clients. Our database of information is key to our ability to maintain contact with Clients and Candidates and thereby operate and grow our business.
- In providing our services, for example, sending Candidates to Clients for interview we will need to exchange personal data: personal data relating to that Candidates will be provided to Clients and vice versa. Without such an exchange of personal data we would not be able to perform our services to you.

We have reviewed the personal data that we collect and its use and have concluded that the processing is necessary for the relevant purpose and are satisfied that there is no other reasonable way to achieve that purpose.

On occasion we may rely on the lawful basis of contract in relation to the processing of personal data, for example, where we have entered into an agreement with you to identify a suitable employment opportunity or with your business to identify possible candidates. We would also rely on the lawful basis of contract where we enter into an agreement to provide any other services to you or to receive services from you or your organisation.

5. What personal data does Tudor Stride collect?

The GDPR applies to ‘personal data’ meaning any information relating to an identifiable person who can be directly or indirectly identified by reference to that information. Personal data that we collect will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. We categorise the type of personal data that we collect into three main groups relating to our Candidates, Clients and Suppliers, as detailed below:

5.1 Candidate data

We will collect personal data whilst working with Candidates to identify suitable employment opportunities; this will likely include the Candidates' name, telephone, address, email and CV. Additional details including photograph, education and employment history, professional profile links, immigration status and financial information may also be collected together with information required by the relevant regulator, for example the UK's Financial Conduct Authority, where you are applying for an approved role with one of our Clients.

5.2 Client data

We collect Client business data, and personal data of the Client's representatives, when we receive it directly from the Client, for example when a Client contacts us proactively to discuss our services. Personal data will include Client business details as well as the name, telephone and email contact details, professional profile links of the Client's representative(s). Personal information will also be collected where our consultants connect with Clients, for example on business networking sites or through performing business development activities.

5.3 Supplier data

We will collect limited personal data from Suppliers as part of our normal business activities and interactions with Suppliers. Information collected will include the contact details of the representative of the Supplier and bank details necessary to pay Suppliers amounts owed.

6. **How is personal data collected?**

Personal data will be collected for specified, explicit and legitimate purposes – the method of collection depending on the type of personal data being collected. Personal data will be collected from Candidates through our interaction with them when identifying suitable employment opportunities; this may be through telephone calls, professional networking sites, email (or other correspondence) or when Candidates send us relevant information, including their CVs. Personal information may be collected by us or provided to us, it may also be gathered through our contact with Clients, in order to provide our services, and Suppliers, when receiving services in the course of operating our business. Personal data may be collected in a face-to-face environment or remotely, online or offline.

7. **How do we use personal data?**

In line with the requirements of the GDPR we undertake to process the personal data that we collect lawfully, fairly and in a transparent manner. We will use personal data in different ways, depending on the type of personal data, to provide our services, as detailed below. Personal data will be processed in a manner compatible with the purposes for which it was collected. We will use organisational procedures to ensure that your data is processed in a manner that ensures appropriate security including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Personal data will be stored and updated, as necessary, during the performance of our services in a manner that enables us to provide our services to you.

7.1 Candidate data

Candidate data held by us will be used to enable us to identify suitable employment opportunities and then co-ordinate the interview and recruitment process. Candidate data will allow us to identify suitable opportunities, which may be either pre-existing vacancies from our database or new opportunities identified by placing recruitment advertisements. We will communicate Candidate data to our Clients, where you have provided your consent for us to do so, as part of providing our services to you (as defined in the contract between us). We will not communicate Candidate personal data to any parties without your consent.

We may use your personal data in relation to payroll activities (where you contract through us), to request further information from you or third-parties in relation to your recruitment with a particular Client or to send you targeted, relevant marketing materials or other communications which we think are likely to be of interest to you.

7.2 Client data

Client data will be used by us to provide our services to Clients, including analysing employment opportunities, seeking further information on existing or potential employment opportunities, establishing payroll arrangements (for example, where we supply Candidates on a contract basis) and generally co-ordinating the interview and recruitment processes.

We may also use Client data, or that of the Client's representative, to send targeted, relevant marketing materials or other communications which we think are likely to be of interest to you.

7.3 Supplier data

Supplier data will be held to facilitate the receipt of services by us from our Suppliers and to enable us to pay for such services. We may collect and use personal data relating to potential new suppliers when performing due diligence on potential new suppliers.

Tudor Stride will work to ensure that personal data remains accurate and is kept up to date; we will take every reasonable step to ensure that personal data that has been identified as inaccurate, having regard to the purposes for which the personal data was collected are erased or rectified without delay.

8. Change of purpose

We will only change the purpose for which we use your personal data where we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using info@tudorstride.com.

9. Disclosure of your personal information

Tudor Stride will need to disclose your personal information as part of the provision of services. Specifically, we will need to share personal information with:

- Clients, i.e. when making introductions to Candidates; and
- Candidates, i.e. as part of the process of arranging interviews with Clients

We may also need to disclose your personal information with select partners and third-parties, again in order to provide our services, for example, marketing companies, reference agencies, payroll processing companies and technical service providers. We only permit our partners to process your personal information for specified purposes, in accordance with our instructions and in line with the same legitimate basis for processing as that adopted by us.

We may be required by law to disclose your personal information, for example, in the event of an investigation by a legal authority.

We will not sell, or unnecessarily share, personal information. If our business is sold or merged we will need to share personal information as part of the sale or merger transaction.

Personal information may be disclosed both inside and outside of the EEA.

10. Retention of your personal information

Tudor Stride will only retain personal data for as long as it is required for our legitimate business interests and where you have consented to its retention. Personal information of our Clients and Candidates is only retained for as long as necessary in order to provide our services to you and fulfil the purposes for which it was collected.

11. Opting out of marketing activities

Under the GDPR you have a right to opt out of receiving marketing materials or communications from us by contacting us on enquiries@tudorstride.com. If you have previously engaged with us (for example submitting a job application or CV or registering for a vacancy to be filled) and we are marketing other recruitment related services we will take your consent as given unless or until you opt out (this is called soft opt-in consent).

12. Changes to the Privacy Policy

This Privacy Policy is effective from 15 August 2018. If we make any changes to our Privacy Policy we will notify you by email and update this section of our website.

13. Data Security

Whilst the transmission of information via the internet is not completely secure we aim to protect your personal information to the best of our ability. You must also be aware that the security of any personal information you transmit to us via our website cannot be guaranteed and is therefore transmitted to us at your own risk.

We have implemented security procedures aimed at preventing unauthorised access to your personal information and to ensure that such information is not accidentally lost, altered or disclosed in an unauthorised manner. If we become aware of a breach in our information security procedures we will notify you without delay.

14. Contact

If you have any questions or concerns regarding how your personal information is collected, processed and stored by Tudor Stride you are encourage to contact:

Mr. Matthew Stride

Enquiries@tudorstride.co.uk

07876 336976

You also have the right to submit a complaint to the UK's supervisory authority for data protection issues: Information Commissioner's Office (ICO), www.ico.org.uk.

We would encourage you to contact us in the first instance in order to discuss any concerns that you have.