



MANE CONTRACT SERVICES LIMITED

PRIVACY POLICY

This privacy policy sets out how Mane Contract Services Limited (**'Mane'**) uses and protects your personal data. This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a copy of the policy [here](#).

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1. Important information and who we are

Privacy policy

This privacy policy gives you information about how Mane collects and uses your personal data through your use of this website and/or our services, including any data you may provide when you register with us; submit

your details through our 'Contact Us' page; or engage with us as a supplier, customer, candidate, client, or other third party.

This website is not intended for children and we do not knowingly collect data relating to children.

Controller

Mane is the controller and responsible for your personal data (collectively referred to as "Mane", "the Company" "we", "us" or "our" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights (paragraph 9), please contact the us using the information set out in the contact details section (paragraph 10).

2. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes home address, business address, email address and telephone numbers.
- **Financial Data** includes bank account and payment details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access our website.
- **Profile Data** includes your username and password, accounts made by you, preferences, feedback and survey responses.
- **Usage Data** includes information about how you interact with and use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **aggregated data** such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Subscribe to our services;
 - Register to use our website by creating a user account;
 - You register to enter our database;
 - subscribe to our publications;
 - attend our events;
 - participate in discussion boards or other social media functions on our site;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us, including when you report a problem with our site or services.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy <https://www.mane.co.uk/cookie-policy/> further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below
- Technical Data is collected from the following parties:
 - analytics providers, including Google Analytics (Google LLC, based outside the UK);
 - advertising networks, including Google Ads, Meta Ads / Facebook Pixel (Meta Platforms Inc), LinkedIn Campaign Manager (LinkedIn Corporation), Indeed Sponsored Jobs (Indeed Inc), and TikTok for Business (TikTok Ltd), all based outside the UK; and
 - search information providers, including Microsoft Advertising / Bing Ads (Microsoft Corporation), Google Tag Manager (Google LLC), and Hotjar / Contentsquare, all based outside the UK.
- Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services.
- Identity and Contact Data is collected from data brokers and aggregators, including Sourcewhale (based inside the UK), which we use to source and manage contact information for candidates and clients in connection with our recruitment and business development activities.
- We also collect personal data in the following ways:
 - **Clients and business development** -- Identity and Contact Data relating to client contacts and prospects is collected through LinkedIn, networking events, referrals, and

direct outreach in the course of our business development activities. This data is stored and managed within our CRM system.

- **MSPs and supply chain partners** -- Identity and Contact Data is received from Managed Service Providers and neutral vendors where we operate as part of a managed supply chain arrangement, for the purposes of managing assignments and fulfilling contractual obligations.
- **Suppliers and contractors** -- Identity, Contact, and Financial Data is collected from suppliers and their representatives in the course of onboarding, procurement, and payment processing.
- **Referrals** -- where candidates or clients refer third parties to us, we will receive Identity and Contact Data from the referring party. Where required, we will notify the individual whose data has been shared with us at the earliest opportunity.
- **Events and marketing** -- Identity and Contact Data is collected at networking events, conferences, and other business events we attend or host, including through business cards and event badge scanning. We also collect contact data in connection with our email marketing activities where individuals have opted in or where we have a legitimate interest in contacting them.
- **Umbrella companies and payroll bureaus** -- Identity, Contact, Financial, and Transaction Data is received from umbrella companies and payroll bureaus in connection with the engagement and payment of temporary workers.
- **Onboarding and compliance** -- Identity and Contact Data is collected from right to work checking services, identity verification providers, and qualification or membership checking bodies as part of our pre-engagement compliance process.

4. How we use your personal data

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.

- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis
To register you as a new Client or Candidate	(a) Identity (b) Contact	Performance of a contract with you For example, when a candidate first registers with us we collect their name, contact details, and employment history in order to create their profile and begin the matching process. When a client contacts us to source candidates, we collect the details of their representative to set up the relationship. The legal basis is performance of a contract, or taking steps prior to entering into one, as neither party can engage our services without this information being collected.
To deliver our services, information or products to you, including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) For example, we process financial and transaction data to raise invoices to clients for permanent placement fees or temporary staffing services, and to ensure payroll obligations are met for temporary workers. Where a client fails to pay an invoice, we may use identity and contact data to pursue recovery. The primary basis is performance of a contract. Where we pursue unpaid debts, we rely on legitimate interests, as recovering money owed to us is a reasonable and proportionate business activity. For example, we process financial and transaction data to raise invoices to clients for permanent placement fees or

		temporary staffing services, and to ensure payroll obligations are met for temporary workers. Where a client fails to pay an invoice, we may use identity and contact data to pursue recovery. The primary basis is performance of a contract. Where we pursue unpaid debts, we rely on legitimate interests, as recovering money owed to us is a reasonable and proportionate business activity.
To manage our relationship with you as a Client or Candidate which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Marketing Communications and	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you) For example, if we update our terms of business or this privacy policy, we will contact you using the details we hold. If you raise a complaint or query about a placement or our service, we will use your identity and contact data to respond and keep a record of the matter. We rely on contract performance where the communication relates directly to our services, legal obligation where we are required to notify you of certain changes, and legitimate interests where we are maintaining accurate records and managing our ongoing relationship with you. For example, if we update our terms of business or this privacy policy, we will contact you using the details we hold. If you raise a complaint or query about a placement or our service, we will use your identity and contact data to respond and keep a record of the matter. We rely on contract performance where the communication relates directly to our services, legal obligation where we are required to notify you of certain changes, and legitimate interests where we are maintaining accurate records and

		managing our ongoing relationship with you.
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business) For example, if we run a survey to gather feedback from clients or candidates about our service, we will use the data you provide solely for that purpose. Participation is voluntary. We rely on contract performance where a prize or incentive is offered, and legitimate interests where the purpose is to improve our understanding of how our services are used and how they can be developed.
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation For example, we process technical data to monitor the performance and security of our website, to identify and resolve faults, and to protect against unauthorised access or fraud. We also process identity and contact data in the context of IT support and system administration. We rely on legitimate interests as these activities are necessary for the safe and effective operation of our business and IT infrastructure, and on legal obligation where applicable, for example in relation to data security requirements under UK GDPR.
To deliver relevant website content and online advertisements to you and measure or understand the	(a) Identity (b) Contact	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to

effectiveness of the advertising we serve to you	(c) Profile (d) Usage (e) Marketing Communications and (f) Technical	grow our business and to inform our marketing strategy) For example, we use profile, usage, and technical data collected via tools such as Google Ads, LinkedIn Campaign Manager, and Meta Ads to serve advertising to individuals who have visited our website or match our target audience. We also analyse which content on our website is most viewed in order to improve relevance. We rely on legitimate interests for this activity, balanced against your right to object, and on your cookie consent where the use of tracking technologies requires it under PECR.
To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) For example, we use Google Analytics and similar tools to understand how users navigate our website, which pages generate the most engagement, and where users drop off. This helps us improve the structure and content of our site and the effectiveness of our communications. We rely on legitimate interests as this processing is necessary to keep our website and services relevant and competitive, and the impact on individuals is low given the aggregated and anonymised nature of much of this data.
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing Communications and	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) OR Consent, having obtained your prior consent to receiving direct marketing communications For example, we may contact candidates with details of roles that match their profile, or contact clients with information

		about services relevant to their sector or hiring activity. Where we have an existing relationship with you, we rely on legitimate interests to send relevant direct marketing, and you have the right to opt out at any time. Where we do not have an existing relationship, or where the law requires it, we will obtain your consent before sending marketing communications.
To carry out market research through your voluntary participation in surveys		Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services). For example, we may invite clients or candidates to complete a voluntary feedback survey following a placement or interaction with us. The data collected is used only to improve our services and is not shared with third parties for their own purposes. We rely on legitimate interests as this activity helps us understand how our services are perceived and where improvements can be made.
To provide you with information about other goods and services we offer that are similar to those that you have already purchased, been provided with or enquired about.	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) OR Consent, having obtained your prior consent to receiving direct marketing communications For example, if you have previously used our permanent recruitment services, we may contact you with information about our temporary staffing or executive search services. Where we have an existing client or candidate relationship, we rely on legitimate interests to do this. Where consent is required, for example in the case of electronic marketing to individuals, we will ensure consent has been obtained and will honour any opt-out request promptly.

Direct marketing

During the registration process on our website when your personal data is collected, you will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving the marketing.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of marketing

You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us marketing@mane.co.uk

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example relating to the ongoing provision of our services to you, updates to our Terms and Conditions, checking that your contact details are correct.

Cookies

For more information about the cookies we use and how to change your cookie preferences, please see <https://www.mane.co.uk/cookie-policy/>

5. Disclosures of your personal data

We may share your personal data where necessary with the parties set out below for the purposes set out in the table [Purposes for which we will use your personal data](#) above.

- External Third Parties such as:
 - Our professional advisers (legal, accountancy, tax, compliance etc)
 - HMRC
 - Managed Service Providers (if you are a Candidate looking for work)
 - Our Clients (if you are a Candidate looking for work)
 - Any third party umbrella companies
 - Website management company
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens

to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We do not typically transfer your personal data outside the UK unless we are working with a client outside the UK or submitting candidate data to a client outside the UK.

Whenever we transfer your personal data out of the UK to countries which have laws that do not provide the same level of data protection as the UK law, we always ensure that a similar degree of protection is afforded to it by ensuring that the following safeguards are implemented:

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place:

- We will only transfer your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data, or we may use specific standard contractual terms approved for use in the UK which give the transferred personal data the same protection as it has in the UK, namely the International Data Transfer Agreement. To obtain a copy of these contractual safeguards, please contact us at hr@mane.co.uk

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see paragraph 9 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see [OPTING OUT OF MARKETING](#) in paragraph 4 for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-

readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in section 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us (see Contact details (paragraph 10)).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Email address: hr@mane.co.uk

- Postal address: 3rd Floor, 6 Hercules Way, Watford, WD25 7GS
- Telephone number: 01923 470 700

11. Complaints

You have the right to make a complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. The ICO will expect you to have done this before reviewing your complaint. You can send your complaints to hr@mane.co.uk

12. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

13. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.