

MANE CONTRACT SERVICES LIMITED

UK GDPR Candidate Privacy Notice

What is the purpose of this document?

Mane Contract Services Limited ("Mane") is a "controller" in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work through us as a recruitment agency/employment business. It makes you aware of how and why your personal data will be used, namely for the purposes of accessing our services; engaging with employment or temporary work opportunities; and the associated recruitment processes, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulation (UK GDPR).

Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

Who is your personal information collected from?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Disclosure and Barring Service in respect of criminal convictions.
- Your named referees, from whom we collect the following categories of data: name, employment dates, duties, job title.
- Any third-party databases and job boards to which you have subscribed, including social media.

The kind of information we hold about you

In connection with your application to us for support in finding work opportunities, we will collect, store and use the following categories of personal information about you:

- Information you have provided to us through our website using the 'Contact Us' form or where you have created an account or submitted an application for a job through our website.
- The information you have provided to us in your curriculum vitae and covering letter.
- Any information or documentation you have provided on our application form, during any meeting(s) or telephone call(s), or provided by you over email, post or in person, or through a third-party submission, including but not limited to:
 - Name;
 - Address;
 - Telephone number;
 - Personal email address and corporate/professional email address;
 - Education history;
 - Qualifications (verification and evidence of qualifications);
 - Previous employment history and experience;
 - Wellbeing and health information;
 - Financial information including previous salary information, salary expectations, as well as bank details for payroll purposes where necessary;
 - Compliance documentation;
 - References;
 - Evidence of your right to work in the UK; if not in the UK
 - If work is not in the UK, evidence of right to work in the location of work.
 - Telephone call recordings
 - Links to your professional profiles available in the public domain, e.g. LinkedIn, X, Business Facebook.
- Any information you provide to us during your interview **OR** the interview process

- Information obtained from sources other than yourself previously referred to in this notice, including but not limited to:
 - LinkedIn
 - Corporate websites;
 - Job Board websites;
 - Online CV libraries;
 - Your business card;
 - Personal recommendations.
- In respect of temporary work placements, any information received from our Clients, for example: information in respect of your performance, attendance, timesheets (this list is not exhaustive).

This may involve us collecting, storing and using the following types of more sensitive personal information:

- Information about your race or ethnicity, religious or philosophical beliefs, trade union membership, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the work (which may include permanent roles, or temporary work opportunities).
- Carry out background and reference checks, where applicable.
- Communicate with you about our services and any subsequent recruitment process.
- Keep records related to our work for you in finding work opportunities and supporting you through any recruitment processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to put you forward for a role or assignment with a Client since it would be beneficial to our Client's business to appoint someone to that work and it accords with the purpose of our work for you.

We may sometimes use your personal data because we have a recognised legitimate interest. Where we rely on a recognised legitimate interest, we will ensure the use is strictly necessary and only use or share the minimum data required.

We also need to process your personal information to decide whether to enter into a contract with, or agreement to represent, you.

Having received your CV, application form and other relevant information from you, we will have an initial meeting with you to determine whether we have any Client's with current suitable vacancies for you. We will then process that information to decide whether you meet the basic requirements to be submitted to the Client for them to consider you for the role. After we have submitted your details to the Client (see data sharing below) it will be for the Client to determine if your application is strong enough for them to invite you for an interview.

Before we use your personal data for any new purpose, we will ensure the processing is fair and lawful. In particular, we will confirm that an appropriate lawful basis applies to the new purpose and (where relevant) that any additional requirements for special category data or criminal offence data are met. We will carefully consider whether any new use is compatible with the original purpose for which your data was collected.

We will not use your personal data in ways that are unexpected, unfair, or that could have an unjustified negative impact on you.

In certain circumstances, the law treats further processing as compatible without requiring a full compatibility assessment, for example, where processing is carried out for archiving in the public interest, scientific or historical research, or statistical purposes, provided appropriate safeguards are in place.

Where we do intend to use your data for a new purpose, we will inform you and provide any relevant information before doing so. In some cases, you will have the right to object to that use, and we will make you aware of this right whenever it applies.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to support you effectively in looking for work. For example, if we require right to work proof or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information

Where appropriate we will use your particularly sensitive personal information in the following ways:

- We use information about disability to consider whether we need to provide appropriate adjustments during our work with you and to support you during any subsequent recruitment process, for example whether adjustments need to be made during any meetings with us or if we need to make any prospective employers aware

of any adjustments you may require to attend interview or complete any necessary assessments.

- We use information about racial or ethnic origin, religious or philosophical beliefs, disability or sexual orientation to ensure meaningful equal opportunity monitoring and reporting.

Information about criminal convictions

We do not routinely process information about criminal convictions or offences. In the limited circumstances where we are required to do so, we will only process such information where we have a lawful basis to do so, and where required by law or our legitimate interests, we will seek your explicit consent before doing so. Such information is handled with strict confidentiality and retained only for as long as is necessary.

Automated decision-making

Automated decision-making is the process of making decisions by automated means, with or without any human involvement.

We do not make decisions about you based solely on automated processing that would have legal, or similarly significant, effects for you. We will notify you if this position changes.

Cookies and similar technologies

Our website uses cookies and similar technologies (cookies). Some cookies are essential for functionality and security. We also use cookies (including those set by trusted third parties) to help us understand how candidates use our recruitment and job search pages, improve the website, and measure the effectiveness of our recruitment activity. For analytics and optimisation cookies, we provide clear information and an easy way to opt out through our cookie settings. Some cookies, particularly those set by third parties for advertising or tracking purposes, require your consent before we place them on your device. For more information about what cookies are, how we use them, including which third parties may set cookies and their purposes, please see our Cookie Policy <https://www.mane.co.uk/cookie-policy/>. You can change your cookie preferences at any time through our cookie settings.

Data sharing

Why might you share my personal information with third parties?

We will only share your personal information with the following third parties for the purposes of processing your application:

- Our Clients (businesses who are sourcing employees or temporary workers, or on a speculative basis where appropriate)
- Managed Service Providers who are sourcing temporary workers (where a client engages an MSP to manage its temporary or contingent workforce, we may share

your information with that MSP as part of the placement process. MSPs may have access to our systems to review assignment and pay information in real time for the purposes of workforce management and reporting.)

- HMRC
- Payroll providers
- Compliance checking services

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Cross-border data transfers

We will not transfer your personal information outside the UK unless you are looking for work outside the UK.

Where we transfer your personal information between the UK and the European Economic Area (**EEA**), those transfers are made in accordance with the UK government's adequacy decision in favour of countries in the EEA and the European Commission's adequacy decision in favour of the UK.

Whenever we transfer your personal information out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. For further details, contact the HR Department.
- Where we use certain service providers located outside the EEA, we use specific contracts approved by the UK which give personal data the same protection it has in the UK. For further details, contact our HR Department.

If you would like further details on the specific mechanism we use when transferring your personal information out of the UK, contact the HR Department.

Data security

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

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

Data retention

How long will you use my information for?

We will retain your personal information for a period of 24 months after you have successfully obtained a permanent placement with one of our clients, unless you request for your data to be removed, or for a period of 30 days after you have asked to be removed from our candidate database in respect of temporary work opportunities.

We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted our work in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

If we would like to retain your personal information on file, on the basis that we might be able to consider you for an opportunity that may arise in future, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period for that purpose.

Rights of access, rectification, erasure, objection, restriction and data portability

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as making a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. We will conduct a reasonable and proportionate search for your personal information.
- **Request rectification** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact The HR Department whose contact details are hr@mane.co.uk or 01923 470 700.

Right to withdraw consent

You have the right to withdraw consent at any time. To withdraw your consent, please contact The HR Department whose contact details are hr@mane.co.uk or 01923 470 700. Once we have received notification that you have withdrawn your consent, we will no longer be able to provide our services to you (unless you re-register) and we will erase and dispose of your personal data securely.

Questions or complaints

If you have any questions or concerns about this privacy notice or how we handle your personal information, please contact The HR department who has been appointed to oversee compliance with this privacy notice and whose contact details are hr@mane.co.uk or 01923 470 700.

You have the right to complain to us if you consider that there has been an infringement of your rights in relation to your personal data.

You can submit a complaint using the following channels:

- Email: HR@mane.co.uk
- Post: 3rd Floor, 6 Hercules Way, Watford, WD25 7GS
- Telephone: 01923 470 700

When we receive a data protection complaint, we will:

- Acknowledge receipt no later than 30 days from receiving it.
- Take appropriate steps to respond without undue delay, which may include making enquiries into the subject matter of the complaint and, where appropriate, keeping you informed about the progress of our handling of the complaint.
- Inform you of the outcome without undue delay.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), who is responsible for data protection issues in the UK. For further information, see the ICO website at [Make a complaint | ICO](#)