

KC Partners Ltd. “KC” Privacy Policy

Last updated: [11th October 2021]

Your personal data and privacy matters

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

Your personal data and privacy is important to us.

We are committed to safeguarding your personal data and protecting your privacy.

This privacy policy explains how we achieve that by describing:

1. how this privacy policy applies to you;
2. who we are;
3. when this privacy policy does not apply;
4. who is involved in the collection and handling of your personal data;
5. what personal data about you do we collect;
6. where do we source your personal data from and how;
7. whether you have to provide the information that we have requested from you;
8. what we do with your personal data;
9. who do we share your personal data with;
10. cookies policy;
11. where we send your personal data to for storage or other specific purposes;
12. how we look after your personal data;
13. how long we will keep your personal data for;
14. keeping your personal data up to date;
15. what your legal rights are in respect of the activities listed above; and
16. how to contact us.

1. How this privacy policy applies to you

This privacy policy applies to:

- **Website Users** – any individual visitors to, and users of, our websites whose personal data is collected by us in the course of the Website Users' use and navigation around our websites;
- **Candidates** – applicants for any type of job or engagement via us whose personal data is collected in the course of our recruitment of them;
- **Referees** – referees of Candidates whose personal data is collected in the course of our verification of a Candidate; and/or
- **Corporate Staff** – individuals who work for, or are engaged by, our customers, clients or suppliers whose personal data is collected in the course of our work with them.

The groups of individuals referred to above will be collectively referred to in this privacy policy as “**you**” unless one or more of the groups or their personal data are specifically being addressed.

This privacy policy replaces any privacy policy that we have previously issued.

Any notices or statements relating to data, data protection, fair processing and/or privacy that we may issue at the time of collecting personal data about you will supplement this privacy policy. They are not intended to override it.

We may change this privacy policy from time to time to reflect changes in the law and/or our personal data handling activities and data protection practices.

We encourage you to check this privacy policy for changes whenever you visit our website, as we may not always notify you of the changes.

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.

2. Who we are

We are KC Partners Limited, operating under the name 'KC' (company number 10148779) of registered address Kemp House, 160 City Road, London, EC1V 2NX, United Kingdom.

We are a legal recruitment company operating as legal recruiters, consultants and introducers and through our work we handle sensitive information in order to provide our services. We conduct ourselves in accordance with the highest ethical standards and take every step to ensure confidentiality. We want to provide a safe and secure experience to all of our stakeholders. We will ensure your personal data is only used for the purposes set out in this legitimate interest policy. We will typically be the primary data controller of your personal data.

The applicable data controller will be referred to as “**we**”, “**us**”, “**our**” from now on within this privacy policy.

3. When this privacy policy does not apply

There are instances where we act for and on behalf of a client.

They will not be acting as a data controller in this capacity but instead as a data processor of the client, who will be the data controller.

The privacy policy or privacy notice of the client will apply in those instances and **NOT** this privacy policy.

Where we are a data processor, we will aim to refer you to the applicable data controller and their privacy policy in the event you have any data protection-related queries.

4. Who is involved in the collection and handling of your personal data?

The applicable data controller will largely be the entity involved in the collection and handling of your personal data. The following other parties may be involved, however:

- **Third party service providers** – we may instruct third parties to assist us to collect and handle your personal data on our behalf. Those third parties will carry out those activities in accordance with GDPR guidelines. We use data storage providers which provide secure, password protection and encryption features; and
- **Third party hyperlinks & connectors** – our website and/or services may include links to third party websites, plug-ins and applications, such as in the form of banner advertisements.

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 parties and are not responsible for their data protection compliance. When you leave our website or connect to a third party from us, it is your responsibility to familiarise yourself with their privacy policy or notice, as we accept no responsibility for, and have

no control over, them or any information or data collected by or for them.

5. What personal data about you do we collect?

Personal data means “*any information relating to an identified or identifiable individual*”.

It does not therefore include data where the identity has been removed (anonymous data).

We will collect and handle, process, use, store, share and transfer (generically referred to as **handling**) the different kinds of personal data about you that is listed under the name of the category of individual that applies to you.

We may also collect information from you if you request information or initiate enquiries with us.

CANDIDATES:

- **Identity Data**, which includes your title, first name, last name, maiden name, date of birth, gender,

photograph, national insurance number (or equivalent in your country), nationality (and, if you are not British, place of birth, your residency and citizenship status and length of residency in the UK), marital status and number of dependents;

- **Contact Data**, which includes your billing address, delivery address, email address and telephone numbers, emergency contact details and contact details history;
- **Historical Data**, which includes educational history and credentials, employment history and results from England and Wales' Disclosure and Barring Service checks (or the equivalent in other countries);
- **Employment-related Data**, which includes your current remuneration, pension and benefits, what role you are looking for, status updates and what work-related areas interest you;
- **Business Plan-related Data**, which includes business plans, strategy papers, lateral partner questionnaires, due diligence questionnaires which may include sensitive information about your clients, transactions and information related to your current firm;
- **Verification Data**, which includes a copy of your driving licence, passport, identity card or other form of identification and referee details;
- **Financial Data**, which includes your bank sort code and account number and tax-related information;
- **Diversity Data**, which includes racial or ethnic origin, religious or other similar beliefs and physical or mental health, including disability-related information;
- **Technical Data**, which includes your internet protocol (IP) address, MAC address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, mobile phone location data and other technology on the devices you use to access our website and our services;
- **Profile Data**, which includes your usernames and passwords, your interests and preferences and other insights or determinants that we have gained from our analysis and profiling of you;
- **Usage Data**, which includes how you use and navigate around our websites and what you browse within them and any CCTV footage collected when you have attended our premises. We will also keep records of your contact with us and any feedback and survey responses that you have submitted; and
- **Marketing Data**, which includes your preferences in receiving marketing from us and our third parties and your communication preferences; and
- **Other Data**. The above list of personal data is not exhaustive. You, your referees or third-party sources may tell us extra information that we have not listed above.

During the recruitment process, we will make a copy of your passport, which is considered to be a Special Category of Personal Data as it can reveal your racial or ethnic origin.

All Special Categories of Personal Data will be handled in accordance with this privacy policy.

We do not any collect any other Special Categories of Personal Data about you apart from those explained above.

"Special Categories of Personal Data" include personal data that reveal your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

WEBSITE USERS:

- **Technical Data;**
 - **Profile Data;**
 - **Usage Data** – but not CCTV footage; and
 - **Marketing Data.**
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REFEREES and CORPORATE STAFF:

- **Identity Data;** and
- **Contact Data.**

Third Party and Publicly Available Sources

Not all the personal information we hold about you will always come directly from you. We may also collect information from third parties such as our business partners, service providers and publicly available websites (i.e. social media platforms), to comply with our legal and regulatory obligations, offer services we think may be of interest, to help us maintain data accuracy and provide and enhance the services.

In respect of Candidates and Website Users only, we also handle the following types of data:

- **Aggregated Data**, such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy; and
- **Anonymised Data**, which is data created from your personal data where your identity has been removed.

We do not intentionally collect personal data relating to children.

6. Where do we source your personal data from and how?

CANDIDATES:

We generally collect your personal data directly from you. For example, we collect all of your personal data when you:

- deal with us in person, by telephone, letter, fax, email, social media platforms or via our websites;
- register with us;
- submit any other information to us, such as a CV;
- complete psychometric assessments;
- subscribe to job alerts emails;
- subscribe to our publications;
- enter a competition, promotion or survey; and/or
- give us some feedback.

We also use the following channels to collect your personal data:

- **Third parties** –
 - your Identity and Historical Data from:
 - pre-employment screening and background checking organisations;

- your referees;
 - your past educators and employers and relevant education authorities;
 - governmental and regulatory bodies such as the HMRC, England and Wales' Disclosure and Barring Service and the UK Information Commissioner's Office (or the equivalent organizations in your country);
 - the third-party suppliers, including other recruitment and employment agencies, job board providers and job aggregators and our managed service providers who are within our supply chain;
- your Technical, Profile and Usage Data from our analytics providers, such as Google Analytics;
 - all of your personal data where you were referred to us through a third-party employment agency;
- **Publicly available sources** – we may receive personal data about you from public sources as set out below:
 - your Identity and Historical Data from social media sites, such as LinkedIn, Twitter and Facebook;
 - your company website profile data; and
 - your Identity, Contact Data from Companies House and the Electoral Register based inside the EU.

WEBSITE USERS: we will collect all of your personal data via our third-party service providers, such as Google Analytics.

We collect browser and cookie information when you first navigate to our websites. We use cookies to give you a better customer experience and for use of access. This will be monitored by a web server. For more information on the use of cookies, how you can control their use, and information relating to our internet-based and mobile advertising, please see Section 12.

7. Whether you have to provide the information that we have requested from you

If you don't provide certain information to us, we may not be able to carry out the operations that we carry out in relation to you.

We'll make it clear to you which personal data is optional to provide and which personal data without which we cannot carry out our operations.

8. What we do with your personal data

We process personal information to provide our services and for business-related purposes.

Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you;
 - where it is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests; and
 - where we need to comply with a legal or regulatory obligation.
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CANDIDATES: This information is held, used and disclosed by us as follows:

- provide recruitment and/or related intermediary services to or for you;
 - to maintain our business relationship, where you are a user of our website, a client or candidate;
 - match your details against job vacancies which we feel may be appropriate for you in order to assess your suitability for them;
 - to enable you to provide us with your CV that we submit to our client(s) for an opportunity;
 - apply for jobs on your behalf by sending your data to clients;
 - facilitate the recruitment process from there, if the client wishes to progress with you;
 - inform you about any relevant industry developments, send you details of any events, promotions and competitions, and to communicate any other relevant information;
 - if we merge or are acquired by another business or company, we may share personal information with the new owners of the business or company and their advisors and if this happens, you will be sent notice of such event;
 - we may also release personal information to regulatory or law enforcement agencies if they require us to do so. We will also disclose your information where we are permitted and requested to do so by law; and
 - answer your enquiries or questions;
 - statistical analysis;
 - diversity monitoring;
 - comply with our regulatory commitments;
 - regulatory monitoring purposes – to prevent or detect crime, where the law requires us to carry out such monitoring.
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WEBSITE USERS: your personal data will be collected and handled by us in order to:

- to improve our customer service and to make the way we operate more useful to you (which includes tailoring our websites to better suit your requirements);
- let you know about our recruitment services across all areas of our business;
- **Marketing preferences** – to receive information from us or have purchased products or services from us, we will send you communications which may include the following:
 - e-newsletters and hard copy newsletters;
 - emails about the services we offer and new product launches;
 - reminders when your products or services may be due for renewal; and
 - opportunities to participate in market research.

We will communicate with you by post, telephone, SMS, email or other electronic means such as via social and digital media. We may use your Usage Data to help ensure that this messaging is personalised and relevant to you;

- **Cookies** – a cookie is a simple text file that is stored on your computer or mobile device by a website's server. Each cookie is unique to your web browser. It will contain some anonymous information, such as a unique identifier and the site name. We may use your Technical Data to allow us to show you adverts while you are on-line that are relevant to you. Sometimes, we will use cookies to do this and you can find out more about this and how to turn off cookies by reading our Cookies Policy in Section 12.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may

become inaccessible or not function properly.

REFEREES: we will use your personal data purely to verify a Candidate.

CORPORATE STAFF: we will use your personal data only to pursue our contractual relationship with your employer or engager.

9. Who do we share your personal data with?

We may share your personal data with the following entities for business purposes:

- prospective employers or engagers;
- other recruitment companies or intermediaries involved in managing the supply of personnel;
- sub-contractors of recruitment services;
- pre-employment screening and background checking organisations;
- your referees;
- your past educators and employers and relevant education authorities;
- your professional bodies;
- market research organisations who help us to develop and improve our operations, products and services;
- governmental and regulatory bodies such as the HMRC, England and Wales' Disclosure and Barring Service and the UK Information Commissioner's Office (or the equivalent organisations in your country);
- the third party suppliers, including other recruitment and employment agencies, job board providers and job aggregators and our managed service providers who are within our supply chain;
- 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 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 where possible and within reason which includes this privacy policy.

10. Cookies policy

We use the following cookies on the Website:

Cookies are small data files, applied by the majority of websites, which transfer text-only information to the hard drive of your computer.

We use the following cookies on the Website:

Google Analytics and WordPress cookies to collect standard internet log information and details of visitor behaviour patterns to enable us to maintain and develop the Website. The data gathered is anonymous and does not identify individual users.



Strictly necessary cookies to help our Website operate effectively. These cookies are essential in order to enable you to register with us. These cookies do not remember where you have been on the internet. This category of cookies cannot be disabled.

By using the Website, you accept the use of these cookies.

You may control the cookies used by websites by modifying the settings in your browser – view the help menu to change your cookie preferences.

To access the Google Analytics, opt out browser, please visit <https://tools.google.com/dlpage/gaoptout>. By choosing this option, you will block Google Analytics across all websites.

For more detailed information about cookies and how they can be managed and deleted please visit www.allaboutcookies.org.

Other websites

Please note that clicking on links and banner advertisements may result in your transferral to another website - where data privacy practices may be different to that of KC. Visitors should consult the other websites' privacy policies as we are not responsible for, and have no control over, information that is submitted to or collected by these third parties.

Internet-based transfers

Given that the Internet is a global environment, using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis. Therefore, by browsing our website and communicating electronically with us, you acknowledge and agree to our processing of personal data in this way.

13. Where we send your personal data to for storage or other specific purposes

We're based in the UK and will not typically transfer your personal data outside the EEA.

The personal data we collect from you may be transferred outside the EEA either by us and/or by any of the third parties to whom your personal data may be disclosed to as listed in Section 11. Such transfers will occur only where they are necessary as part of the recruitment and/or related intermediary services we provide e.g. where you apply for a vacancy or position outside the EEA, or where the transfer is authorised by law.

If we do transfer your personal data outside the EEA, we'll make sure that suitable safeguards are in place, for example by using approved contractual agreements, unless certain exceptions apply, or we are authorized to do so.

We will provide you with details of the safeguards that we have implemented, if you would like to know what they are.

14. How we look after your personal data?

We hold your personal data in a combination of secure computer storage facilities and paper-based files.

We have put in place an appropriate level of security around your personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage to it.

We have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk of harm that might result from, unauthorised or unlawful processing accidental or unlawful loss, destruction or alteration, unauthorised (or disclosure of) access or damage to your personal data including:

- locks and security systems;
- user names and passwords;
- virus checking;
- encryption;
- auditing procedures and data integrity checks; and
- recording of file movements.

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 via the access controls listed above. They are also subject to a duty of confidentiality.

We have agreed security related measures with the third parties we share your personal data with to ensure that it is treated by those third parties in a way that is consistent with how we safeguard your personal data.

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

If you suspect any misuse or loss of or unauthorised access to your personal data, please let us know immediately by contacting us, please see Section 18.

15. How long we will keep your personal data for

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

We will appropriately and securely dispose of your personal data when it is no longer required.

To determine the appropriate retention period for personal data, we consider the following factors:

- amount and nature of the personal data;
- its sensitivity;
- the potential risk of harm from unauthorised use or disclosure of the personal data;
- the purposes for which we handle your personal data;
- whether we can achieve those purposes through other means; and
- the applicable legal requirements.

Based on those factors, we have determined that the following retention periods should apply in respect of personal data of the following categories of individuals (unless the law or any data supervisory authority or regulator requires otherwise):

- **Placed Candidates** – where we placed you with one of our customers, we will keep your personal data for as long as you continue your placement or are actively looking for another one through us. If we lose contact with you, we will keep your personal data only for another 18 months after the last two-way contact that we had with you whereupon we will archive your personal data. We will however keep, for legal claims purposes, basic personal data about Candidates who have been placed with our clients for 7 years after they cease being employed or engaged;

- **Non-placed Candidates** – if we did not manage to place you, we will keep your personal data for at least 2 years from the date of creation of your personal data file or, if later, at least 2 years after the date on which we last had any two-way contact with you;
- **Website Users** – we will keep your personal data for 2 years after your last use of, or navigation around, any of our websites;
- **Referees** – we will keep your personal data for as long as the Candidate for whom you were a referee is placed with one of our customers. If they move on from that position, we will keep your personal data for a further 2 years after that date; and
- **Corporate Staff** – we will keep your personal data for as long as the entity that you work for is connected to us in any way. Where we end our relationship with that entity for any reason, we will keep your personal data for a further 2 years after that date.

Personal data relating to criminal convictions and offences – we do not believe that we will handle any of this type of personal data. When carrying out the criminal convictions checks, we will only handle binary information as to whether or not a Candidate has a criminal conviction within the category of offences for which we have conducted such a check. The categories that we typically search for are theft, fraud, breach of trust and financial crimes. Where we discover that a Candidate has such a criminal conviction, we will withdraw that individual from any of our recruitment processes and will destroy that binary information immediately.

In some circumstances, you can ask us to delete your personal data. Please see the **Right of erasure** below for further information.

We will keep and use Anonymised Data indefinitely without further notice to you.

16. Keeping your personal data up to date

We take reasonable steps to ensure that your personal data is accurate, complete and up to date.

We may contact you from time to time to check that the personal data is still correct.

Please let us know of any changes to your details as soon as you reasonably can so that we can uphold our commitment to accuracy, completeness and currency.

17. What are your legal rights in respect of your personal data that we handle?

We set out below a list of the legal rights that all individuals have under data protection laws in relation to our handling of your personal data. They don't apply in all circumstances:

- **Right to be informed** – about your personal data and details of the handling and processing of that personal data and information, including the safeguards used to protect any of your personal data in the event that we transfer it outside the EEA;
- **Right of access** – to your personal data and to obtain information about how we handle and process it;
- **Right to have inaccuracies corrected** – this is a right to have your personal data corrected if it is inaccurate and to have incomplete personal data completed;
- **Right of erasure** – of your personal data, which is also known as the “*right to be forgotten*”;
- **Right to restrict handling and processing** – of your personal data, which includes requesting us to suppress your personal data file;
- **Right to move, copy or transfer** – your personal data to another organization, also known as “*data portability*”;

- **Right to object** – to the handling and processing of your personal data for certain purposes, in particular to personal data processed for direct marketing purposes and to personal data that is handled and processed for certain reasons based on our legitimate interests;
- **Right to withdraw consent** – you may withdraw any consent or permission that you have previously provided to us in relation to our handling and processing of your personal data, such as for the purposes of marketing by electronic means;
- **Rights in relation to automated decision making** – where such automated decision making has a legal effect on you or otherwise significantly affects you; and
- **Right to complain** – in all circumstances, you may complain to:
 - us in relation to the handling of your personal data; or
 - the Information Commissioner's Office which enforces data protection laws, whose contact details are set out on www.ico.org.uk.

Procedure to exercise your legal rights

- **Contact us** – if you wish to exercise any of your legal rights please see Section 18. In this instance, we'll explain first whether or not the right you wish to exercise applies. We will then facilitate your request in accordance with the procedure below if it does apply.
- **Fees** – you will not have to pay a fee to access your personal data or to exercise any other rights that apply. We may, however, charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- **Our request for further information** – we may need to request certain information from you to help us confirm your identity and ensure that your right to access your personal data (or to exercise any of your other rights that apply). This is a security measure to ensure that any personal data is not disclosed to any persons 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.
- **Response time** – we will respond to all legitimate requests as soon as we can. It should not take longer than a month to do so. Occasionally, it may 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.

18. How to contact us

For any requests related to your personal information or any of your rights referenced above, please feel free to contact us:

Email:

Managing Director, Robert Hanna: rhanna@kcpartners.co.uk

Post:

KC Partners Limited, Kemp House, 160 City Road, London, EC1V 2NX, United Kingdom