Data Protection Privacy Notice
Personal data obtained from the data subject

INTRODUCTION

Step Ahead ('the Company') is a recruitment business and training provider which provides work-finding services to its clients and work-seekers. An established and respected Company with a reputation for providing high-quality recruitment and employment services, the Company must process personal data (including special category data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from both publicly available sources such as, but not limited to; job boards, third party employer websites and LinkedIn, submissions of information to our website via candidates directly and from telephone conversations and meetings with candidates where the information was directly disclosed to our staff. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

COLLECTION AND USE OF PERSONAL DATA

a. Purpose of processing and legal basis

The company will collect your personal data data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. The legal bases we rely upon to offer these services to you are:

- Your consent
- Where we have a legitimate interest and processing is necessary for the performance of a contract with you or to take steps at your request to enter into a contract
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you
- Processing is necessary for carrying out our obligations under employment, social security or social protection law, or a collective agreement, providing for appropriate safeguards for the fundamental rights and interests of the individual

b. Legitimate interest

Where the Company has relied on a legitimate interest to process your personal data our legitimate interest(s) is/are as follows:

- Providing you with work-finding services and our clients with relevant candidates, including sending your information to our clients where you have demonstrated an interest in doing that particular type of work but not expressly

consented to our passing on your cv or application

- Contacting you with information about products or services similar to those which you have used from us recently
- Managing our database and keeping work-seeker records up to date
- Contacting you to seek your consent where we need it
- IT security
- Prevention of fraud and disclosing information about possible criminal acts or security threats to the authorities.
- Where permitted, limited service-related communication that is relevant to your engagement with us and compliant with applicable data protection and marketing laws

c. Recipients of data

The Company will process your personal data and/or special category data with the following recipients.

- Clients we introduce or supply individuals to
- Your former or prospective new employers that we obtain references from or provide references to
- Trade bodies that we are a member of and any other third parties who may have access to our data or who carry out audits to ensure we run our business correctly
- Umbrella companies
- Master/neutral vendors, managed services and recruitment agencies in our supply chain
- Public information sources and third-party organisations we may use to carry out suitability checks on work-seekers, e.g. the Disclosure and Barring Service (DBS)
- Government, law enforcement agencies and other regulators e.g. the Police, Home Office, HMRC, Employment Agencies Standards Inspectorate (EASI), Local Authority Designated Officers (LADOs), GLAA,
- Authorised third-party service providers strictly where necessary to deliver our services (including CRM systems, hosting providers, IT support, payroll services, background screening providers, legal and compliance advisers, and accountancy services), and
- any other organisations you ask us to share your data with.

Furthermore, the Company reserves the right to work with suppliers providing services including, but not limited to: database, server and/or website hosting; proprietary software support (e.g. for our CRM/Timesheet systems); IT consulting and support services; legal advice; insurance; background screening; payroll/umbrella services; legal advisers; accountancy/financial services; quality management/accreditation, and administrative and back-office support services. Such third parties will have access to personal information only so far as is necessary to carry out the services.

d. Statutory/ contractual requirement

Your personal data is required by law and/or a contractual requirement, e.g. our client may require this personal data, and/or a requirement necessary to enter into a contract or as part of a statutory requirement, such as the Conduct of Employment Agencies and Employment Businesses Regulations 2003. You are obliged to provide the personal data and if you do not the consequences of failure to provide the data are:

- We may not be able to introduce you to Clients, supply you with work-seeking services or employ you.

OVERSEAS TRANSFERS

The Company may transfer only the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information.

We will take steps to ensure adequate protections appropriate safeguards are in place to ensure the security of your information, in accordance with UK data protection law. These safeguards may include adequacy regulations, the UK International Data Transfer Agreement (IDTA), or the UK Addendum to EU Standard Contractual Clauses, depending on the destination country and recipient.

The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein

Offshore access to personal data

The Company may permit access to personal data by employees or authorised personnel located outside the UK and/or European Economic Area (EEA) for operational purposes, including recruitment and support services.

Where such access occurs, we ensure appropriate safeguards are in place as set out above (including IDTA, SCC Addendum, or adequacy regulations).

All offshore personnel are subject to confidentiality obligations, data protection requirements, and the same internal security policies as UK-based staff.

Access is strictly role-based, limited to what is necessary for their job role, and granted on a need-to-know basis.

We implement appropriate technical and organisational measures, including access controls, monitoring, and staff training, to ensure ongoing compliance with UK GDPR. permit access to personal data by employees or authorised personnel located outside the UK and/or EEA for operational.

DATA RETENTION

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time.

The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC, and associated national minimum wage, social security, pensions and tax legislation.

Where processing is based on legal obligation or legitimate interests, we will retain data only for as long as required or reasonably necessary for those purposes.

YOUR RIGHTS

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data/sensitive personal data you have the right to withdraw that consent at any time by contacting our Data Protection Officer. Contact details are provided at the end of this notice.

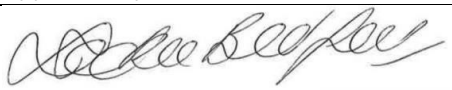
There may be circumstances where the Company will still need to process your data for legal or official reasons. We will inform you if this is the case. Where this is the case, we will restrict the data to only what is necessary for the purpose of meeting those specific reasons.

If you believe that any of your data that the Company processes is incorrect or incomplete, please contact us using the details at the end of this notice and we will take reasonable steps to check its accuracy and correct it where necessary. You can also use these details to contact us if you want to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

COMPLAINTS OR QUERIES

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact us via email at info@stepahead.co.uk.

You also have the right to raise concerns with Information Commissioner's Office (on 0303 123 1113 or at https://ico.org.uk/make-a-complaint/), or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

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