

## **GVL Consulting Privacy Policy**

Any references to "we", "us", "our", or "the company", are references to GVL Consulting Ltd (GVL) of company number 07009163.

This privacy policy sets out how we gather, use and protect any information that you may provide to us when using this website [www.gvlconsulting.co.uk](http://www.gvlconsulting.co.uk) or applying for a position through our company.

As a business we are committed to ensuring that we comply with the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) Act and are committed to protecting the privacy of our candidates, clients and users of our website and services. We will ensure that the information you submit to us by way of our website or through our offices is only used for the purposes set out in this policy. Should we ever ask you to provide information by which you could be identified, rest assured this information will only be used in accordance with this privacy policy.

We may make changes to this policy occasionally, by updating this page. You should check this page regularly to ensure that you are happy with the policy and any changes that may have been made. Any changes that may be made to this policy will in no way contravene our guarantee of confidentiality.

### **Who we are?**

GVL is a recruitment consultancy working within the IT and business change sectors. Our role is to source, assess and submit suitably qualified candidates to our client companies. Our services include, but are not limited to, the interviewing and submission of candidates, advertising of client vacancies, updating existing users of our services and advising of market conditions. All services are governed by human intervention and are not reliant on any totally automated assessment.

### **Gathering Information**

Any details that you may submit to us via the registration process on this website or directly to one of our offices, will be stored by us and will be accessible by employees of the company. The information will be collated from that contained in a CV and collected directly from the candidate (data subject). Personal data includes but is not limited to name, address, nationality, salary, occupation, job history, education, referees, data collected from information sent to GVL by the data subject or in the case of CV banks and social network sites where the data subject has put this information in the public domain.

The personal data we collect will be used for the following purposes:

- Assessing the data subject's suitability against a job role using past experience, education and relevant skills to carry out the specific or related vacancy.
- Reviewing against all vacancies that may be of interest to the data subject.
- For the purpose of interviewing a candidate.
- Submitting a candidate to the client we have discussed and gained consent.
- Encrypted storage of information which is relevant and up to date.

Our legal basis for processing personal data:

- By consent of the data subject.
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract.
- Processing is necessary for compliance with a legal obligation.
- Processing is necessary to protect the vital interests of a data subject or another person.
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

- Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.
- To ensure the right to work in the UK/EU of the data subject.
- To establish suitability to the role/s being applied for on behalf of our clients to provide the service levels agreed.
- To establish information in regard to what the data subject is seeking when applying for roles we are working on.

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Where the data subject has expressed an interest in a role that we have advertised, to establish suitability to the criteria of the role, based on education, location, skills and experience.
- GVL is the first stage of the screening process for sourcing and assessing to carry out the service on behalf of clients.

## **Disclosure of Information**

### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

### Client Data

- When working on behalf of a client, we will need to collect and use information about individuals in an organisation. This will include, but is not limited to name, position, contact details and relevant information to carry out services such as sourcing candidates to a brief or for notifying you of other services likely to be relevant and useful such as advertising and response management options.

### Supplier Data

- If you are a supplier to us, we will require information to ensure that our process and service level standards are operating at the highest possible levels. We will need to store the contact details of individuals that we will be dealing with in your organisation as well as bank details so that we can pay for the goods and services you provide to us.

### How we use your information

This privacy notice tells you how we, GVL, will collect and use your personal data for the services of a recruitment consultancy acting on behalf of our clients to source and identify suitable candidates for vacancies we are working on to a given brief. We will use your information to carry out this service and to also manage complaints, subscriptions and profiling.

### Why does GVL need to collect and store personal data?

In order for us to provide our clients and applicants with the best possible service levels we need to collect personal data for correspondence and security purposes and to enable us to identify suitable roles that applicants may be interested in and suitable for at any time. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose and does not constitute an invasion of your privacy.

In terms of being contacted for relevant marketing purposes GVL would not need to contact you for additional consent.

### Will GVL share my personal data with anyone else?

As a recruitment consultancy, we may pass your personal data on to a client company working with GVL in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service we have outlined. When they no longer need your data to fulfil this service, they will dispose of the details in line with GVL's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

### How will GVL use the personal data it collects about me?

GVL will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. GVL is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

### Under what circumstances will GVL contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

### Can I find out the personal data that the organisation holds about me?

GVL, at your request, can confirm what information we hold about you and how it is processed. If GVL does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Retail Human Resources or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

### What forms of ID will I need to provide in order to access this?

GVL accepts the following forms of ID when information on your personal data is requested: Passport, driving licence, birth certificate

### **Jobs By Email Information**

If you wish to subscribe to our jobs by email service, you will be required to provide your email address. Your email address will only be used for sending out requested vacancies or supplying you with other information from our clients, if you have given your consent for us to do so at the time of registration. We reserve the right to collate and provide statistical information to third parties, such as

number of subscribers in particular locations, etc. This information will never be presented in a way that may link to any personally identifiable details about you.

## **CV Submission**

You have the option of sending us your CV via this website. Your CV will only be accessible by GVL employees and will only be sent to prospective employers with your prior consent. You should ensure that your CV and any other details held by us about you remain up to date, and we recommend that you update your CV every six months.

## **Cookies**

A cookie is a data file that a website sends to your computer via your web browser. These files are quite safe as they are unable to spread any type of virus to your computer. Cookies are usually used to provide websites with user information for such activities as the tracking of web traffic (this would be done on an aggregate basis so as to keep users anonymous). Sites that have sent cookies to your computer will appear to 'remember' visitor information such as logins, preferences and other viewing habits.

Most web browsers will automatically accept cookies, however if you would prefer to decline them being sent to your computer, you should be able to modify your browser settings to do this. Please bear in mind though that doing so may prevent you from taking full advantage of this website.

## **Security**

This website is protected from any unauthorised access using the latest in physical, electronic and managerial procedures in order to safeguard the information we collect online.

### Contact details of the Data Protection Officer:

Contact Name:	Genevieve Llewelyn
Address line 1:	The Hive, Weston Super Mare, BS24 8EE
Email:	genevieve@gvlconsulting.co.uk
Telephone:	01275 409921