



# Candidate and Consultant Privacy Notice.

This notice explains how we handle your personal information when you apply for a position with us or put you forward for a client assignment. We have tried to set out the information as clearly as possible but if you find any part of this notice unclear or have further questions about how we will handle your personal information please do not hesitate to contact us.

### **Who We Are and How You Can Contact Us**

We are OCS Group UK Limited (company number 03056469).

Contact details:           Data Protection Officer, OCS Group UK Ltd  
New Century House, The Havens,  
Ipswich IP3 9SJ

by email at: [dataprotection@ocs.com](mailto:dataprotection@ocs.com)

### **What Personal Information Do We Collect About You?**

We may collect, store, and use your personal information when you apply for a position with us and your information is added to our database of potential colleagues. This may include:

- Personal information that you provide to us

You share personal information with us when you provide us with a copy of your CV or application form and during the communications we have with you while considering your application for a position with us or adding you to our database of potential colleagues. The personal information that you provide to us may include your name, address, telephone numbers, date of birth, e-mail address, qualifications, work and education history, salary information and history, details of any disciplinary proceedings, trade union membership, criminal records and convictions, your eligibility to work, your opinions and preferences, career goals or ambitions and diversity and equality monitoring information. If we interview you, we may also retain written interview notes, including details of our opinions regarding your performance during an interview.

- Personal information that we receive from third parties

It is likely that the personal information you provide to us directly, will be supplemented by additional personal information that we receive from third parties while considering your application for a position with us, deciding to add you to our database of potential employees or workers. For example, we may collect references about you from your named referees. We may also receive your CV or your details direct from recruitment agencies, sponsors or colleges, LinkedIn or CV watchdog websites.

## What Do We Use Your Personal Information For?

We will use your personal information to:

- communicate with you and provide you with the information that you request from us;
- manage and administer the recruitment process and our database of potential colleagues (including to assess your suitability for vacancies or assignments, undertake background or reference checks, prepare contracts and to obtain references and feedback);
- ask if you would like to introduce friends or contacts to us who may wish to be added to our database of potential colleagues (unless you advise us that you do not wish to be contacted for this purpose);
- manage and administer our business;
- and comply with legal or regulatory requirements.

Data collected from third parties is combined with the personal information that you provide to us and used for the purposes described above.

We shall process your personal data on the basis that it is necessary to comply with a legal obligation, to take specific steps before entering into a contract with you or for our legitimate interests (for running our business and administering the recruitment process and deciding whether to appoint you to a role and whether to enter into a contract of employment with you.)

## How We Use Special Category Information

We may also collect, store and use the following “special categories” of personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership (only where you have mentioned this in your application).
- Information about your health, including any medical condition, health and sickness including pre-employment screening.
- Biometric data, which includes data collected by facial recognition systems.
- Information about criminal convictions and offences.

We need further justification for processing these “special categories” of personal information and may only process such personal information:

- when we need to carry out our legal obligations, where we have a legal basis, or to exercise rights in connection your application or addition to our database. For example, we will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- in limited circumstances, with your explicit consent. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of any offer of employment with us that you agree to any request for consent from us.

### **Who Might We Share Your Personal Information With?**

We will share your personal information with current or potential clients with whom you may be placed on an assignment and any sub-contractors or suppliers we use while vetting applicants.

We will also share your personal information with other entities in our group to administer your application or contract with us, as part of our regular reporting activities on company performance, in the context of a business reorganisation, group restructuring exercise, for system maintenance support and hosting of data.

We may also share your personal information if:

- we are under a duty to disclose or share your personal data in order to comply with any legal obligation or in order to enforce any legal rights or agreements we enter into with you or to protect the rights, property, or safety of our clients, ourselves or others. This includes exchanging information with other companies and organisations for the purpose of fraud protection;
- we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or asset.

### **Are You Legally Obligated to Provide Us with Your Personal Information?**

You are not under any legal obligation to provide us with any of your personal information but please note that if you elect not to provide us with your personal information we may be unable to consider you for a position with us or add you to our database of potential colleagues.

### **Do We Need Your Consent to Use Your Personal Information?**

Whilst we always want you to be aware of how we are using your personal information, this does not necessarily mean that we are required to ask for your consent before we can use it. In the day to day running of our business we may use your personal information without asking for your consent because:

- we are considering entering a contract of employment, consultancy contract or other work arrangement with you;
- we are required to take certain actions to meet our legal or regulatory obligations e.g. confirming your “right to work” in the UK;
- we need to use your personal information for our own legitimate purposes (such as the administration and management of our business, identifying potential consultants to add to our database and the improvement of our services and network) and our doing so will not interfere with your privacy rights.

In exceptional circumstances, we may wish to use your personal information for a different purpose which does require your consent. In these circumstances, we will contact you to explain how we wish to use your personal information and to ask for your consent. You are not required to give consent just because we ask for it. Consent can be withdrawn at any time. Please see “Your rights and how can you control the information we hold about you” below.

### **How Do We Keep Your Personal Information Safe?**

We take every care to ensure that your personal information is kept secure. The security measures we take include:

- only storing your personal data on our secure servers or in a secure cloud environment; ensuring that our staff receive regular data security awareness training;
- keeping paper records to a minimum and ensuring that those we do have are stored in locked filing cabinets on our office premises;
- maintaining up to date firewalls and anti-virus software to minimise the risk of unauthorised access to our systems;
- enforcing a strict policy on the use of mobile devices and out of office working; limiting access to data on a need to know basis.

### **How Do We Ensure Your Personal Information is Protected if it is Sent Outside the European Economic Area (EEA)?**

We, or our sub-contractors, may transfer your personal information to, and store it at, a destination outside the EEA, including OCS Group companies based in the UK. In all such cases, we shall ensure appropriate safeguards are put in place to protect your personal data and your rights and freedoms.

Where we or our sub-contractors use IT systems or software that is provided by non-UK companies, your personal data may be stored on the servers of these non-UK companies outside the EEA.

In all cases where your personal data is transferred to a destination outside the EEA, we will complete a Data Protection Impact Assessment / International Data Transfer Assessment in order to ensure that your data is treated securely and in accordance with this notice by applying adequate safeguards. These may include entering into binding corporate rules or the use of standard contractual clauses approved by the Information Commissioner's Office.

### **How Long Do We Keep Your Personal Information?**

Your data is kept for 2 years and we will contact you prior to that to confirm that you still want to hear from us. However, you can opt out of these communications at any time by visiting your profile or by contacting us at [dataprotection@ocs.com](mailto:dataprotection@ocs.com)

If you are employed by us we will retain the personal information that we collected about you during the recruitment process. During the course of your employment with us we will also collect additional personal information in relation to the ongoing management and administration of your employment which will be stored and handled separately in accordance with our internal staff policies and procedures.

### **Automated Decision Making and Profiling**

We will not use your personal information to make automated decisions about you or to profile you.

## Your Rights and How You Can Control the Information We Hold About You

You have a legal right to know what personal data we hold about you - this is called the right of subject access. You can exercise this right by sending us a written request at any time. Please mark your letter "Subject Access Request" and send it to us at [dataprotection@ocs.com](mailto:dataprotection@ocs.com)

You also have the following rights under data protection law:

- to prevent your personal data being used for marketing purposes;
- to have inaccurate personal data corrected, blocked or erased;
- to object to decisions being made about you by automated means or to your personal data being used for profiling purposes;
- to object to our using your personal data in ways that are likely to cause you damage or distress; restrict our use of your personal data;
- to request that we delete your personal data;
- to require that we provide you with a copy of any personal data we hold about you.

The above rights do not apply in all cases, particularly where personal data must be processed and/or retained for legal or regulatory reasons.

If you want to exercise any of these rights, please contact the Data Protection Officer in writing. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## How to Raise a Concern

If you have any questions about the use of your data or you would like to raise a concern please contact us at [dataprotection@ocs.com](mailto:dataprotection@ocs.com)

You are also entitled to contact the Information Commissioner's office at [www.ico.org.uk](http://www.ico.org.uk).

## How We Keep This Notice Up to Date

We will review and update this notice annually.

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Policy Name	Privacy Notice for Candidates and Consultants
Policy Owner	Data Protection Officer
Version	5.0
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