



## Anubian Consulting Privacy Notice

The purpose of this Privacy Notice is to let you know how we collect, use, share, transfer and otherwise process information about you.

### Who are we?

**Company:** Anubian Consulting (a trading division of Osirian Consulting Ltd)  
**Address:** 22 Farnham Drive, Caversham, Reading, RG4 6NY  
**Data Protection Manager:** Rachael Lee  
**Contact email:** rachael.lee@anubian.co.uk

We are committed to protecting your personal information, otherwise known as data, to maintain your trust and confidence in us. We are registered with the Information Commissioners Office (ICO) and we are a Data Controller. We will process and store personal data in accordance with the provisions of the Data Protection Act and the General Data Protection Regulations (GDPR).

Personal data is any information that relates to a natural living person who can be identified from the data. Personal data may also include special category data (previously known as sensitive personal data) which relates to you, this may include the following:

- Racial
- Ethnic origin
- Political opinions
- Religious beliefs
- Philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Health data
- Data concerning a natural person's sex life
- Sexual orientation
- Other

We will inform you what category of data we are collecting or that we obtain from any third party concerning you.

### What information will we collect about you?

In order for us to provide the services to you we need to collect certain personal data.

Personal data includes, but may not be limited to:

- Your name
- Email address
- Telephone number
- Location details/address
- Date of birth

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- Sex
- Education and qualifications
- Work experience
- Bank details
- NI Number
- Emergency contact details
- Online identifier/IP address

In addition, as part of our registration process we may also ask for details of the following and will request additional permissions to share this with named third parties. Refusal to do so may limit or exclude you from some opportunities. All data will be processed in line with the regulations set out within Article 9 and 10 within GDPR 2016/679.

- Health/medical information
- Unspent criminal convictions

If you did not provide your personal data to us directly, we would have sourced it from one of the following sources:

- LinkedIn
- CV Library
- Jobserve
- Publicly available on another social media or website
- A referral from another person

We are intent on collecting only the information that is appropriate for the purpose and does not invade your privacy. Where we need to contact you for marketing purposes we will seek additional consent.

### **How will we use that data that we collect about you?**

We will process your data (programme/project managers) for the purpose of work-finding services. We will process your data (clients potentially requiring project delivery) for the purposes of managing project delivery. We comply with the obligations under GDPR by keeping your personal data up-to-date by; storing and destroying it securely; by not collecting or retaining excessive amounts of data; protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We will use your personal data for the purpose of providing work finding services and any subsequent employment, engagement, placement or selection processes. This will include but may not be limited to the following:

- Providing your personal data to prospective employers
- Requesting references from previous employers
- Processing payroll for any hours worked by you

We will need to retain your personal data and to share it with third parties in order complete our legitimate interest.

As we act as both an employment agency and an employment business, in accordance with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, we are under a

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legal obligation to provide relevant information about you to any hirer/prospective employer insofar as it relates to your suitability for the role. As a result, we may need to provide certain information to a hirer whether or not you have consented to us doing so. For further information, please refer to Regulation 20 of the above regulations.

Currently we do not process any of your data outside of the EEA, however if this changes we will update this notice.

In order to provide work-finding services to you, your personal data may be disclosed to:

- Potential employers and any third-party businesses/intermediaries acting on behalf of those potential employers
- Organisations which we may approach to obtain professional or academic references
- Organisations which we contact to verify any training, qualifications, certifications and professional memberships held by you
- Government departments, such as the Home Office, for the purpose of checking or verifying your right to work in the United Kingdom
- Our professional advisors and administrative service providers
- Any third-party company through which you are contracting or are proposing to contract, such as an umbrella company

We may also disclose your personal data to third-parties where we are permitted or required by law to do so:

- To comply with any legal obligation, such as the obligation to report payroll and Intermediary Company payments to HMRC
- To comply with any court order, summons or subpoena
- To investigate or prevent crime
- To comply with any lawful request which is made by a governmental department or agency
- To bring or defend legal proceedings or to take legal advice in respect of any potential legal proceedings

Your personal data will not otherwise be shared with any other organisations unless you have given your direct and personal consent to the sharing of personal data.

### **What is the lawful basis for processing the data?**

#### **Consent**

In certain circumstances we will require consent to process both personal data and special category data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting the Data Protection Manager for the company.

#### **Legitimate interest**

As a recruitment business we introduce candidates to clients for permanent employment and independent professional contracts. The exchange of personal information of our candidates and our client contacts is a fundamental, essential part of this process.

We maintain a database of relevant personal information of prospective and engaged candidates and clients containing historical information as well as current resourcing requirements, in order to:

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- Support candidates' career aspirations throughout their career and support our clients' resourcing needs and strategies
- Carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us
- We will rely on contract if we are negotiating or have entered into a contract to provide services to, or receive services from you or your organisation
- We will rely on legal obligation if we are legally required to hold information on you, e.g. by tax law

We will, in some circumstances, rely on consent for particular uses of your data. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate).

Just so you are aware our online recruitment systems do not use Automated Decision Making tools to assess the suitability of applicants but we utilise the skills and experience of our consultants to assess your capability and experience.

We do not collect or compile personal information for distribution or sale to outside parties for consumer marketing purposes, or host mailings on behalf of third parties.

#### How long will we keep your data?

We understand our legal duty to retain accurate data and only retain personal information for as long as it is required for carrying out the data processing activities mentioned above. Accordingly, we have a data retention policy and run data routines to remove data that we no longer have a legitimate business interest in maintaining.

We will keep in touch with you regularly to confirm all the information we hold is accurate and up to date and you still wish for us to hold your data, you can ask us at any stage to remove your information. Prior to making any introduction to our client we will check with you that we have the most up to date and accurate information.

#### What rights do you have as a data subject?

As an Individual you have the right to be informed about the collection and use of your personal data. This is a key transparency requirement under the GDPR.

- **The right to be informed**
- **The right of access** – you have a right to access the information we hold about you
- **The right to rectification** – you have the right to correct the data that we hold about you that is incomplete or inaccurate
- **The right to erasure** – under certain circumstances you can ask us to delete data that we hold about you
- **The right to restrict processing** – you can ask us to restrict the processing under certain circumstances
- **The right to data portability** – you have the right to request that we transfer information about you to another organisation.
- **The right to object** – you have the right to object to certain types of processing.
- **Rights in relation to automated decision making and profiling**

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In order to exercise your rights, you need to contact us and we will send you a subject access request form.

### How do I find out what data is being held about me?

You are entitled to see the information held about you and you may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If you wish to do this, or you have a complaint please contact us at the email address above. There is no fee for this service.

You need to submit a Subject Access Request to us and we can confirm what information we hold about you and how it is processed. If we do hold personal data about you, you can request the relevant information, including the following:

- The identity and contact details of the person or organisation that is processing your personal data
- The contact details of our Data Protection Manager, where appropriate, or the company’s representative
- The reason and the legal basis for the processing
- Whether the processing is based on legitimate interest
- The categories and special categories of data
- How long the data will be stored for
- Whether the provision of the data is a contractual requirement or a statutory one and whether and what the consequences are if the individual fails to provide the relevant data
- Any details of automated decision making, such as profiling and any relevant information about the logic involved in the decision-making process, including the significance and expected consequences of the processing

### Who do I complain to if I’m not happy?

If you wish to complain about how your personal data is being processed by us or any third party that processes data on our behalf, or how your complaint has been handled by us, you can complain by contacting us on the details above or direct to the supervisory authority:

Information Commissioners Office  
<https://ico.org.uk/concerns/handling/>  
 Tel: 0303 123 1113

### Document Control and Change History

We keep our Privacy Notice under regular review, it was last updated as seen below.

Version	Revisor	Description of Change	Date of Change	Next Review
v.1	RL/CL/RSH	Final version	22/05/18	01/06/19
v.2	MP/VP	Update for Anubian Consulting	01/05/19	01/06/20

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