



PRIVACY POLICY

BACKGROUND:

DB Recruitment Solutions Ltd trading as Estrata Recruitment understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of all our candidates, clients, professional contacts and those who visit our Website, www.estratarecruitment.com or www.estrata.co.uk and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

- “personal data”** means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data and
- “We/Us/Our”** means DB Recruitment Solutions Ltd trading as Estrata Recruitment, a limited company registered in England under Company No: 07976749, whose registered address is: C/O PB Sandcroft Management Services Ltd, 3 Morley’s Place, Sawston, Cambridge, Cambs CB22 3TG

2. Information About Us

- 2.1 DB Recruitment Solutions Ltd trading as Estrata Recruitment, a limited company registered in England under Company No: 07976749, whose registered address is: PB Sandcroft Management Services Ltd, 3 Morley’s Place, Sawston, Cambridge, Cambs CB22 3TG
- 2.2 Deborah Blumfield, can be contacted by email at Deborah@estratarecruitment.com, by telephone on 07766562643, or by post at Our registered address: PB Sandcroft Management Services Ltd, 3 Morley’s Place, Sawston, Cambridge, Cambs CB22 3TG.
- 2.3 We are registered with the Information Commissioners Office no. A8062799

3. What Does This Policy Cover?

This Privacy Policy applies to all personal data We hold about candidates, clients, professional contacts, and visitors to Our Site.

Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.



4. **Your Rights**

- 4.1 As a data subject, you have the following rights, which this Policy and Our use of personal data have been designed to uphold:
 - 4.1.1 The right to be informed about Our collection and use of personal data;
 - 4.1.2 The right of access to the personal data We hold about you (see section 11);
 - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 12);
 - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 12);
 - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
 - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 - 4.1.7 The right to object to Us using your personal data for particular purposes;
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 13 and We will do Our best to solve the problem for you. You also have the right to lodge a complaint with the UK's Information Commissioner's Office. (www.ico.org.uk)
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. **What Data Do We Collect and Where Do We Collect It From?**

Depending upon your relationship with us, We may collect some or all of the following personal data:

- 5.1 name;
- 5.2 date of birth;
- 5.3 gender;
- 5.4 job title;
- 5.5 profession;
- 5.6 contact information such as email addresses and telephone numbers;
- 5.7 demographic information such as post code, preferences, and interests;
- 5.8 salary details and notice period
- 5.9 details of your employment history;
- 5.10 bank account and payment card details (where you are a client making a payment to us);
- 5.11 IP address;



- 5.12 web browser type and version;
- 5.13 operating system and details of your device;
- 5.14 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.

Where do we Collect Your Data From?

We may collect data from different sources:

- 5.2.1 we collect data which you give to us directly when you contact us, or apply for a job using Our Site;
- 5.2.2 we collect the data from online job-boards (such as CV Library, Total Jobs, Indeed) and from LinkedIn and other public sources;
- 5.2.3 we collect technical data (such as your IP address and web browser) automatically when you interact with our website, by using cookies and other similar technologies.

6. How Do We Use Your Data?

- 6.1 Our use of your personal data will always have a lawful basis. We set out below how we use your personal data, and the legal basis on which we use your personal data. Note that we may process your personal data based on more than one legal basis.
- 6.2 We use your personal data for the following purposes:
 - 6.2.1 Entering you as a new candidate or client on our database;
 - 6.2.2 Providing details of candidates to our clients;
 - 6.2.3 To contact you in response to your enquiries, or in connection with vacancies you have applied for;
 - 6.2.4 Supplying Our recruitment services to you;
 - 6.2.5 Personalising and tailoring Our services for you;
 - 6.2.6 To carry out administration in connection with the provision of services to you, including managing payments, fees and charges;
 - 6.2.7 To manage our relationship with you as a client or candidate or professional contact, which will include asking you for feedback and notifying you about changes to our privacy policy;
 - 6.2.8 To send you updates about Our business, or to send you details of vacancies that might be of relevance to you;
 - 6.2.9 Market research, including asking you to complete a questionnaire or feedback form;
 - 6.2.10 To administer and protect our business and Our Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
 - 6.2.11 To use data analytics to improve our website, marketing and client and candidate relationships and experiences.
- 6.3 We rely on the following legal bases to use your personal data:



6.3.1 **Where it is necessary to perform a contract with you**, such as:

- a) to enter you as new client on our database;
- b) to carry out administration in connection with the administration of services to you;
- c) to manage our relationship with you;

6.3.2 **Where it is our legitimate interest to do so**, such as;

- a) to enter you as a new candidate on our database;
- b) to provide details of candidates to clients;
- c) to contact you in response to enquiries, or in connection with vacancies you have applied for;
- d) to carry out administration in connection with the provision of services to you;
- e) to manage Our relationship with you as a candidate or professional contact, which will include asking you for feedback and notifying you about changes to our privacy policy;
- f) to send you updates about Our business, or to send you details of vacancies that might be of relevance to you;
- g) for conducting market research;
- h) administering and protecting Our business and Our Site;
- i) using data analytics to improve Our services or Our Site;

6.3.3 to **comply with some legal obligations**

6.3.4 with your **consent**, such as for marketing.

Marketing

6.4 We may contact you about vacancies or opportunities which may be of interest to you in the future. You can ask us to stop contacting you about these vacancies or opportunities at any time by following the opt-out links on any marketing message sent to you or by contacting us using the details given below.

How long do we keep your data for?

6.5 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods

6.5.1 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purpose for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Full details of your retention are available



on request from our Data Manager

- 6.5.2 For example if you are a candidate we will keep your details for 1 year from the date of your application in order to advise of additional opportunities should arise, unless you advise us otherwise. After that time, we will only keep a record that you previously contacted us

7 How and Where Do We Store and Transfer Your Data?

- 7.1 We do not transfer your data outside of the EEA. We may transfer your data to other countries inside the EEA.
- 7.2 Except as set out in paragraph 7.1 your data will be stored in the UK through the FCP Internet Ltd Evolve CRM database system <https://www.evolvedb.co.uk/> and through the office email system on a secure PC with sole user access.

Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.

- 7.3 Steps We take to secure and protect your data include:
 - 7.3.1 Using a secure CRM and firewalls and virus detection software

8 Do We Share Your Data?

- 8.1 We may have to share your personal data with the parties set out below for the purposes set out in paragraph 6;
 - 8.1.1 Clients, who we send candidate details to;
 - 8.1.2 Our service providers, who provide IT and system administration services, or who store files or documents on our behalf;
 - 8.1.3 Our professional advisers, including lawyers and accountants;
 - 8.1.4 HMRC and other authorities based in the UK who require reporting of our processing activities in certain circumstances.
- 8.2 We do not allow out 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.
- 8.3 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.



9 What Happens If Our Business Changes Hands?

9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

9.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new owner or controller.

10 Your Right to Withhold Information

You have the right to withhold your personal data at any time. However, where We need to collect personal data by law, or to provide Our services to you, and you fail to provide data when requested, we may not be able to provide Our services to you. In this case, we may have to cease providing services to you, but if this is the case, we will notify you at the time.

11 How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). No fee is payable where your request is in line with data protection legislation and We will provide any and all information in response to your request free of charge. Please contact Us for more details at Deborah@estratarecruitment.com or using the contact details in section 2. Alternatively, please refer to Our Data Protection Policy.

12 Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at Deborah@estratarecruitment.com, by telephone on 07766 562643, or by post through the registered address at: PB Sandcroft Management Services Ltd, 3 Morley's Place, Sawston, Cambridge, Cambs CB22 3TG. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 11, above).

13 Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.