

Company Name:	Minerva Nursing Ltd (The company)
Company Contact details:	The Operations Officer responsible for Data Protection can be contacted via the email address DataProtection@MinervaNursing.co.uk
Document GDPR 3	Privacy Notice (when personal data is obtained from the data subject)
Topic:	Data protection
Date:	20th May 2018
Version:	Version 1.0

The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including sensitive personal 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, via emails, apps or our website, or we may collect them from another source such as a job board or exhibitions. The Company must have a legal basis for processing your personal data. To provide you with work-finding services or information relating to roles relevant to you, we will only use your personal data as per the terms of the following statement.

1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data to provide you with work-finding services. The legal basis we rely upon to offer these services to you are:

- Consent – for marketing purposes and informing you directly of job opportunities you might be interested in
- Legitimate interest – To enable Minerva Nursing to process your data to be able to place you in appropriate temporary or permanent roles
- Legal obligation – Processing is necessary for compliance with legal obligations that the company is subject to.
- Contractual obligation - Processing is necessary for the performance of contracts with you and our clients

b. Legitimate interest

Where the Company has relied on a legitimate interest to process your personal data, our legitimate interests is as follows:

GDPR Privacy Notice 2

- The company needs to maintain a database of candidates who have the requisite skills, qualifications and experience to fill vacancies, and to be able to offer you the opportunity to be placed in those vacancies

c. Recipient/s of data

The Company might process your personal data and sensitive personal data with the following recipients:

- Any client that you are placed with for compliance purposes
- Any umbrella company that you are paid through
- Auditors authorised by clients for audit purposes
- Occupational Health Providers
- Online Training Providers
- Disclosure and Barring Service providers
- HMRC for tax and payroll purposes
- UK Border agency if clarification for your Right to Work in the UK needs to be sought
- Professional Registration bodies such as the NMC, GMC or HcPC if required

d. Statutory/contractual requirement

Your personal data is required by law or a contractual requirement (e.g. our client may require this personal data), or a requirement necessary to enter into a contract. You are obliged to provide personal data. If you do not, Minerva Nursing will be unable to place you in roles that you are interested in

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

3. 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 and tax legislation.

Where the Company has obtained your consent to process your personal or sensitive data (such as trade union membership or medical details), we will do so in line with our retention policy [(a copy of which is attached)]. Upon expiry of that period, the Company will seek further consent from you. Where consent is not granted, the Company will cease to process your personal or sensitive data.

4. 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 the erasure of your personal data in certain circumstances;
- The right to restrict the 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 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 the company Data Protection Officer by email at DataProtection@MinervaNursing.co.uk or in writing at the address below

5. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact: The Data Protection Officer at DataProtection@MinervaNursing.co.uk

You also have the right to raise concerns with the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, if you believe that your data protection rights have not been adhered to.