

Client Data Privacy Statement

1. Introduction

New Forest HR (NFHR) is strongly committed to protecting the data of our clients and the personal data we collect as part of providing HR Consultancy services to our clients. This privacy statement describes why and how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us, by our clients so that we can provide them with HR Consultancy Services, and by individuals themselves.

Personal data is any information relating to an identified or identifiable living person. NFHR processes personal data to provide the HR Consultancy Services which we are contracted to provide to our clients, including for recruitment purposes.

2. Our Processing Activities

We collect personal data from our clients, or from individuals associated with these clients, or individuals who apply for roles within a client's organisation. For example, we may collect data regarding names, addresses, contact details, salary and benefits, absence, performance, date of birth, employment start date and history, as well as any details usually provided on a CV or job application form. Some of the data we may need to collect will be special category data e.g. where it includes information about an individual's ethnicity, religion, sexual orientation, disability (or other protected characteristics under the Equality Act 2010), health or reasons for absence, medical conditions and prognosis for a return to work e.g. from an independent medical assessment, or membership of a trade union, to list some.

We try to only collect personal data which is necessary for the provision of our services and advice and we ask our clients to only share personal data where it is strictly needed for those purposes.

Where we need to process personal data to provide HR consultancy services, we advise our clients to provide the necessary data privacy information to the data subjects (their employees) regarding its use, and to obtain consent to process personal/special category data if their existing data privacy statement does not detail the appropriate legal basis for doing so e.g. when gaining consent to refer an employee to an independent medical practitioner. Our clients can refer data subjects to this privacy statement where appropriate.

We consider it part of our service to be able to make clients aware of changes in employment practice and employment legislation, which may have an impact on their employment practice or require an

update to their policies and procedures, as well as development opportunities covering HR practice. We will use client business contact details to provide these updates and invitations to events, unless our clients inform us they no longer wish to be contacted in this way or confirm in writing that they wish to end their contract with us.

We will comply with any legal or regulatory requirement with regards to processing or sharing personal data. For example, if we need to provide personal data to as part of a legal claim or for law enforcement purposes.

3. Data Retention Periods

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

In the absence of specific legal, regulatory or contractual requirements, we will keep records and other documents created in the provision of our services for 6 years after provision of that service. Applications or CVs of unsuccessful candidates gathered during a recruitment campaign received as part of a will be retained for 6 months after the recruitment process ends.

4. Data Security and Storage

We ensure that all data regarding our clients, and personal data gathered whilst providing our service, is processed and stored securely. Data is held within a secure IT network and within a securely locked, filing cabinet to which only the Director or lead caseworker has a key.

5. Sharing personal data and locations of processing

We will rarely need to share personal data with a third party and will only do so when we are legally permitted or required to or have the express permission of the client and individual concerned. In such circumstances, we will ensure that they have data privacy and security procedures in place that meet the requirements of the GDPR.

Personal data will not be transferred outside of the European Economic Area (EEA) except for where personal data is processed using, or stored within, cloud-based software and data back-up storage services. These cloud-based services are located in secure data centres around the world, and personal data may be stored in these, for example Apple iCloud or Microsoft OneDrive.

6. Follow-up Contact with Non-Clients and Ending a Consultancy Contract with us

If a company makes contact with us to enquire about our services we will retain their details and may make follow-up contact with them for up to 6 months after they contacted us, unless they inform us that they do not wish us to retain their details.

If a client wishes to end an existing consultancy contract with us, and no longer be contacted by us, they should confirm this in writing.

7. Changes to this privacy statement

This privacy statement was written on the 9th May 2018. We will review this privacy statement regularly to ensure it remains accurate. The latest statement will be posted on our website (www.newforesthhr.co.uk).

8. Data Controller and Contact Information

The data controller is New Forest HR (trading name of Croft Life Ltd. Registered No. 07874203 (England and Wales) at address: The Croft, School Road, Nomansland, Salisbury, Wiltshire, SP5 2BY.

If you have any questions about this privacy statement or how and why we process personal data, please contact us at the above address or by email: natalie@newforesthhr.co.uk. Or phone 07802 626128.

9. Individuals' rights and how to exercise them

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights. We are a Data controller where we decide how and why personal data is processed. The following information explains the rights that individuals have and how to exercise them.

Unless subject to an exemption under the GDPR, individuals have the following rights with respect to their data:

- The right to request a copy of the personal data we hold about you.
- The right to request that we correct personal data if it is inaccurate or out of date.
- The right to request that your personal data is erased where it is no longer necessary to retain it.
- The right to withdraw your consent for processing at any time where we have relied on consent to lawfully process your data.
- The right to ask us to transmit your personal data to another data controller (where we have automated data processing).
- The right, where there is a dispute in relation to the accuracy of your data or processing, to request a restriction is placed on further processing.
- The right to object to processing of personal data where we base processing on legitimate interests.

If an individual would like to exercise any of the above rights they must contact the Data Controller, Natalie Crates by emailing: natalie@newforesth.co.uk.

Much personal data collected and processed by us is correct at the time it was provided for the purposes of seeking advice or HR Consultancy services. Historical records, which were accurate at the time, will be kept of this data in keeping with the purpose and retention periods detailed above.

Clients, or individuals, should inform us if personal data they have provided and which we retain for ongoing processing needs to be updated e.g. contact details supplied on a CV or application for possible future vacancies, where the individual has agreed to us retaining their data.

If an individual asks to see all the data the company has and processes about them (a formal Subject Access Request) we will respond as promptly as possible, but will take no more than 1 month to do so. In certain circumstances an administration charge may be made to process a request.

If you wish to raise a complaint on how we have processed personal data, you can contact Natalie Crates at: natalie@newforesth.co.uk who will investigate the matter.

If you are not satisfied with our response, or believe we are not processing personal data in accordance with the law, you can complain to the Information Commissioner's Office (ICO). Details of how to contact them can be found on their website. www.ico.org.uk