

### Client Privacy Notice

Carisbrook Partners LLP (“**Carisbrook**” or “**we**”) will collect, hold and process personal information about you for the purpose of providing [**INSERT COMPANY NAME**] (the “**Client**”) with recruitment services.

In doing so, Carisbrook is a data controller under applicable data protection laws. Carisbrook has company number OC351842, with its registered office address at 25 Lyndhurst Way, London, SE15 5AG. Carisbrook’s postal address is The Shard, Level 24, 32 London Bridge Street, London, SE1 9SG and telephone number is +44 (0)207 183 9607.

We will process your information at all times in accordance with applicable data protection laws, namely the General Data Protection Regulation and the Data Protection Act 2018. This Notice sets out our processing of your personal information in accordance with those laws. We may update this Notice at any time, and should we do so, we will provide you with a copy of the updated Notice as soon as is reasonably practicable.

The information that we may hold and process about you and the legal basis for the processing of your information is set out below.

<b>Information</b>	<b>Legal Basis</b>
Name Work telephone number Mobile telephone number Email address	The processing of this information is necessary for the purposes of our legitimate interests in being able to offer our services to the Client and, where applicable, to fulfil our contract with the Client.

We use your information to contact you regarding the recruitment activities and needs of the Client. This may, for example, involve contacting you to discuss the Client’s hiring appetite, any ongoing interview processes, offer management, candidate introductions and market commentary.

In many cases, we will receive the above information from you directly. However, we may also receive information about you from a colleague of yours at the Client.

We will not use your information to make decisions about you based solely on automated processing.

### **Disclosure of information**

Your information will be stored on a third-party database (Chameleon i), to which all members of Carisbrook staff have access.

On occasion, with your consent, we may pass your information to a candidate for them to contact you directly. Should this involve the transfer of your information outside of the European Economic Area, we will inform you of this fact and seek your explicit consent prior to the transfer.

## **Consequences of failure to provide information**

You are not obliged to provide us with the above information, however, a failure to do so may hinder or prevent our ability to offer recruitment services to the Client.

## **Your rights**

You have the right to request details of the information we hold about you and to receive a copy of the information (“**Access Request**”). Any Access Request must be made in writing. We will respond without undue delay and in any event within a month of your Access Request (though we may extend this period by a further two months where the Access Request is complex or there are a number of requests). We do not charge a fee for dealing with an Access Request, but reserve the right to charge a reasonable fee for additional copies of information already supplied to you or where requests are “manifestly unfounded or excessive”.

In addition to this right of access, you will also have the following rights in relation to the information we hold about you:

- Rectification – the right to have your information updated where it is inaccurate or incomplete;
- Erasure – the right, in certain instances, to have your information erased;
- Restriction of processing – the right, in certain instances, to have the processing of your information by us restricted;
- Data portability – in certain instances, the right to receive in a useable format some of your information (only where such information was provided to us by you and is processed by automated means); the right to transmit that information to a third party without hindrance from us; and the right to have that information transmitted from us to a third party where technically feasible.

**Where the processing of your information is based on our legitimate interests, you also have the right to object at any time to our processing of that information on grounds relating to your particular situation. Should you make such an objection, we will stop processing the information concerned unless we demonstrate compelling legitimate grounds for the processing which overrides your interests, rights and freedoms or to establish, exercise or defend legal claims.**

**Where we are processing your information for direct marketing purposes, you have the right to object to such processing and should you make such an objection, we will stop processing the information concerned.**

We aim to respond to any requests made in pursuance of the above rights within the same timeframe as responding to an Access Request.

For further information about your rights, or to exercise any of your rights, please contact Robert Beevers at [r.beevers@carisbrookpartners.com](mailto:r.beevers@carisbrookpartners.com).

## **Storage and Retention of Data**

As mentioned above, your information is stored on a third-party database. Carisbrook staff members each have their own login username and password to access the database.

Some of your information may be stored on Spreadsheets, Word documents and PowerPoint documents, which are stored on office computer hard drives and/or the Carisbrook Partners shared Dropbox account. All members of Carisbrook staff have a desktop computer that is password protected. All company desktops are located in a secure office inside the Shard building which has 24 hour, 7 days per week barrier/pass-based security.

Your telephone number and email address may be stored on staff mobile telephones (personal and company). All telephones are protected by a password or finger print scan.

We limit access to your personal information to those employees who have a business need-to-know.

Where we have placed candidates with the Client, we will keep your information for no longer than 7 years after the termination of our relationship with the Client, in case legal proceedings arise during that time. Should such legal proceedings arise, we will retain your data for so long as is necessary to deal with those proceedings.

If we have not placed candidates with the Client, we will keep your information for 5 years from our first contact with you. It is in our legitimate business interests to hold your information for this period of time, so that we may contact you should any suitable opportunities to work together arise.

## **Consent**

If we rely on your consent to process certain information about you, in which case we will notify you of that fact, you may withdraw this consent at any time by contacting Robert Beevers at [r.beevers@carisbrookpartners.com](mailto:r.beevers@carisbrookpartners.com). This will not affect the lawfulness of the processing based on your consent before its withdrawal.

## **Concerns**

Should you have any concerns about our processing of your personal data, you may raise the concern with us in the first instance by contacting Robert Beevers at [r.beevers@carisbrookpartners.com](mailto:r.beevers@carisbrookpartners.com). In circumstances where you do not feel you can resolve the concern directly with us, you can raise the matter with the Information Commissioner's Office by visiting <https://ico.org.uk/concerns/>

Any queries regarding this Privacy Notice should be addressed to Robert Beevers at [r.beevers@carisbrookpartners.com](mailto:r.beevers@carisbrookpartners.com) or alternatively a Partner of Carisbrook.