



## **LUTINE BELL PRIVACY POLICY**

Lutine Bell Ltd is committed to protecting and respecting your privacy. This policy sets out the way we will collect and use information about you in a way that is consistent with our responsibilities and your rights under relevant privacy law. Please read it carefully so that you understand how we will use your information.

### **Information we may collect from you**

We may collect and process the following data about you:

- Information that you provide to us via email or during a telephone conversation.
  - This information may include your name, address, e-mail address, phone numbers, work and education history, full CV, eligibility to work in the UK (or the country in which you have chosen to work), job preferences including role, geographical areas and salary.
  - Any other work related information you provide, for example, education or training certificates and other sensitive personal data as defined in the Data Protection Act 1998
- Information that you provide by filling in either the contact us section, or the career link on our website.
- Information that has been made available on the internet via job boards and business networking / business social media sites.
- On successful placement with a client, we may, or our client may request and hold copies of the above information / documentation
- We may, (or our client may), utilise the services of a third party provider to undertake credit references, employment references and other lawful checks, where a recruitment client requests such information. None of these checks will be undertaken without your permission and you will normally be required to submit the relevant documentation / information directly to the third party provider. The information gathered during these checks will be retained for no longer than is necessary.
- If you contact us, we may keep a record of that correspondence.
- We may also store cookies as set out in more detail below.

### **IP addresses and cookies**

When someone visits [www.lutinebell.com](http://www.lutinebell.com) we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out information such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.



## **Cookies**

We use a technology called 'cookies' as part of a normal business procedure to track patterns of behaviour of visitors to our site. A cookie is an element of data that our website sends to your browser which is then stored on your system. You can set your browser to prevent this happening. Any information collected in this way can be used to identify you unless you change your browser settings. This website does not store any information that would, on its own, allow us to identify individual users of this service without their permission. Any cookies that may be used by this website are used either solely on a per session basis or to maintain user preferences. Cookies are not shared with any third parties.

## **How we use your Personal Information**

In providing this service to you, you consent to your personal data being included on a computerised database and consent to us transferring your personal details to our clients, however your personal data, for example CV, will not be disclosed to any client without your permission.

If you do not wish to consent to the use of your data for any of these purposes, or you wish to amend or remove your data from our database, please e-mail: [administration@lutinebell.com](mailto:administration@lutinebell.com)

We use information held about you in the following ways:

- To provide our services to you in our capacity as an employment business / agency to find you suitable work whether on an Interim or permanent basis based on your requirements.
  - To match your skill sets with Interim and/or Permanent vacancies to assist in finding the positions most suited to you
  - To put forward your details to our clients for you to be considered for vacancies
  - To place you with our clients and prospective employers
  - We may also use your information to contact you by email, telephone and text message to keep you informed of available opportunities as they arise
- To provide you with information or services that you request from us or which we feel may interest you.
- To carry out our obligations arising from any contracts entered into between you and us
- To respond to any communication or enquiries from you
- To notify you about changes to our service

## **Where we store your Personal Data**

The data that we collect from you will be transferred to our database and stored by a third party located inside the European Economic Area (EEA).

It may also be stored or processed by our clients usually located inside the European Economic Area (EEA), but may be transferred to our clients and / or staff operating outside the EEA who work for one of our clients. By providing your personal data, you agree to this transfer, storing



and processing. We endeavour to take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

### **Data Security**

Although we will do our best to protect the storing of your personal data, the transmission of information via the internet is not completely secure and we cannot guarantee the security of your data transmitted to our site or any third party; any transmission is at your own risk.

### **Legal basis for processing the information**

We will rely on your consent to process the information detailed above.

- Information and documentation that establishes your right to work is processed by us as we are legally obliged to do so.
- Information in relation to background screening which is relevant for some roles, will be processed on the basis that it is necessary for us to comply with the law or meet our client requirements.
- Once a position has been found for you, we will process your personal data, including financial information if relevant, for the purpose of you entering into a contract to fulfil your role and to enable us to pay you, or to assist in negotiating a satisfactory remuneration package offer from the client, depending on the specific contractual arrangements and circumstances.
- For the purposes of paying you, where relevant, we are legally obliged to provide information to HMRC.
- We may also process your data on the basis of our legitimate interests i.e. to provide our services to you and for administrative purposes.

### **Disclosure of your information**

We may disclose your personal information:

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or standard terms and conditions of business and other agreements; or to protect the rights, property, or safety of Lutine Bell Ltd, our customers, or others.
- Your data will not be used/disclosed to any third party for marketing purposes.



### **Access to personal information**

Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to Lutine Bell Ltd for any personal information we may hold you need to put the request in writing addressing it to [administation@lutinebell.com](mailto:administation@lutinebell.com) or post the request to the Administration Department at the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

### **Request for Rectification**

If we do hold information about you, you can ask us to correct any mistakes, update information or delete information (in compliance with applicable law) by contacting the administration department.

In addition to right of access, you also have the following rights under GDPR:

#### **Right to be Forgotten:**

In certain circumstances you can ask for the data we hold about you to be erased from our records.

#### **Restriction of Processing:**

Right to restrict the processing of personal data in certain circumstances

#### **Data Portability:**

You have the right to have the data we hold about you transferred to another organisation

#### **Objection:**

Right to object to the processing of personal data under certain circumstances

#### **Retention of Your Data**

Your data will be retained in accordance with our Data Retention Policy.



### **Concern**

If you have a concern about the way we are collecting or using your personal data, please raise your concern with us.

### **Withdrawal of Consent**

If you have provided us with your consent to process your data, for the purpose of using our services and us finding you suitable work opportunities, you have the right to withdraw this at any time. In order to do so please contact us by emailing:

[administration@lutinebell.com](mailto:administration@lutinebell.com)

### **Contact Details:**

Administration Department  
Lutine Bell Ltd  
The Blacksmiths  
Finches Yard  
Mill Green Road  
Haywards Heath  
RH16 1XQ

### **Changes to our Privacy Policy**

We may make changes to this Privacy Policy at any time. Any changes we make to the policy in the future will be posted on this page.