



Data Revolution Ltd who's registered office is 1 Waterside station road, Harpenden, England, AL5 4US. Data Revolution Ltd acts as the data controller of personal information obtained from its clients with a need for recruitment services and of personal information submitted by candidates who are interested in job postings.

Our main aim is to provide our recruitment services to you and to facilitate the recruitment process. In order to fulfil our legal and business obligations we collect your Personal Data such as your **name, address, company details, telephone numbers, email address** and, if you are a candidate, information you supply to us on **your CV**.

If you are a client, we need to collect and use **information about you, or individuals at your organisation** in order to provide you the service of finding candidates who are a suitable fit for you and your organisation.

The provision of your Personal Data may be mandatory in order to **process your requests and for us to provide a service to you**. If so, mandatory fields will be marked with an asterisk or any equivalent on our on-line forms. Failure to provide mandatory data may prohibit Data Revolution Ltd from providing the requested service.

How we use your data:

To be able to provide our products and services to you, your information will be **retained, processed** and **disclosed** by us in the following ways:

- To facilitate the recruitment process, by matching your details to job opportunities.
- To allow details of your skills and experience, to be viewed by our clients whom we feel may be interested in engaging your services. Please be assured that your personal details will only be provided to our clients if you have given permission to us to do so.
- To keep you informed of job opportunities and contract assignments which we think may be of interest to you via email and telephone.
- To keep you updated about services provided by our third party business partners which are relevant to your sector. You can opt out at any time from such e-mails. Please see section below " Access to your Personal Information"
- To carry out our obligations arising from any contracts entered into between you and us. As a result, your information will be accessible to and processed by our recruitment consultants, responsible management, human resources, accounting, audit, compliance, information technology, legal and other corporate staff and selected third party service providers sand suppliers, only if they have a legitimate business need to do so;



access to your personal information

We want you to be in control of what communications you receive from us and how your personal information is used, you can do this in the following ways:

- Unsubscribe from our mailing list: if you decide at any time that you no longer wish to receive marketing emails from us or our group companies, you can either follow the unsubscribe link at the bottom of our marketing email messages to you.
- Alternatively, you can log in to "Your job alert account" via the Data Revolution website.
 - Once on the "Your account" page you can either amend or deactivate your account by clicking on the details page.

If you wish to inform us of any changes to your information or wish to correct the information we hold about you; you can contact us at info@datarevolutionhr.com in the event that you:

- Have any queries about the information that we hold about you.
- Wish to inform us of any changes in your information or wish to correct the information we hold about you
- Have any requests with regard to our processing of your personal data
- Wish to access information held about you.
- Do not wish us to hold your information, you are entitled to tell us at any time and we will remove all such information as specified by you from our database in accordance with the law.

To preserve our business relationship with you as a user of our website

To keep you informed of the products and services (relevant to your sector and your professional interests) offered by us or our group companies via relevant marketing communications. These could include information about recently registered candidates/consultants, client workshops we are arranging, market updates, new software or training courses that may be of interest to you.

To carry out our obligations arising from any contracts entered into between you and us.

To notify you about changes to our services



How can you access, amend or take back the personal data that you have provided to us?

One of the GDPR's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to us. These are described in more detail below.

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about the personal data we hold for you please contact in with us on info@datarevolutionhr.com

We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Right to object: this right enables you to object to us processing your personal data where we do so for one of the following four reasons: (i) our "legitimate interests"; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.

The "legitimate interests" and "direct marketing" categories above are the ones most likely to apply to our website users, candidates, clients and suppliers.

If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:

We can show that we have compelling legitimate grounds for processing which overrides your interests; or

We are processing your data for the establishment, exercise or defense of a legal claim.

If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities (for example, for our marketing arrangements or automatic profiling), you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

Data Subject Access Requests (DSAR): You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. We



may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.

Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding data subject access requests and may refuse your request in accordance with such laws.

Right to erasure: You have the right to request that we erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:

The data are no longer necessary for the purpose for which we originally collected and/or processed them;

Where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;

The data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);

It is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or

If we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding data subject right to erasure and may refuse your request in accordance with local laws.

We would only be entitled to refuse to comply with your request for one of the following reasons:

To exercise the right of freedom of expression and information;

To comply with legal obligations or for the performance of a public interest task or exercise of official authority;

- For public health reasons in the public interest;
- For archival, research or statistical purposes; or
- To exercise or defend a legal claim.



When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.

Right to restrict processing: You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.

The circumstances in which you are entitled to request that we restrict the processing of your personal data are:

- Where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
- Where you object to our processing of your personal data for our legitimate interests.
 - Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
- Where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
- Where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.

If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

Right to rectification: You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

Right of data portability: If you wish, you have the right to transfer your personal data between data controllers. In effect, this means that you are able to transfer your account details to another online platform. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data to another online platform. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.



Right to lodge a complaint with a supervisory authority: You also have the right to lodge a complaint with your local supervisory authority. Details of how to contact us are the following

Email – info@datarevolutionhr.com

Phone – +441702 460010

If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), details of how to contact us are the following

Email – info@datarevolutionhr.com

Phone - +441702 460010

Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Sharing your information

We want to provide as full a service as possible and support you in your recruitment needs. We appreciate that candidates with specialist expertise have a strong preference for dealing with equally specialist recruiters. In turn, we are able to offer clients higher quality candidates. Your personal information will be shared with VMR Consultants Limited and all other subsidiaries of the Vertical Market Recruitment Group.

Our trading names of VMR Consultants Limited are the following J People, Dot Net Resourcing, ERP Associates and Data Revolution.

hyperlinks

Our web site may contain links to other web sites, which are outside our control and are not covered by this statement. If you access other sites using the links provided, the operators of these sites may collect information from you, which will be used by them in accordance with their privacy policy, which may differ from ours.

Data quality

We rely on you to ensure that your information is complete, accurate and current. Please do inform us promptly of any changes to or inaccuracies of your personal information by sending an email to info@datarevolutionhr.com. However you can update your CV at any time you are logged in to the Data Revolution website.



Data retention

The Company will retain your personal data for 5 years since the date we last provided you with work finding services. 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 the date on which we last provide you with work-finding services. As per our retention policy we will retain your personal data for 5 years since the date we last provided 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 or by legitimate interest to process your personal and sensitive personal data including but not limited to name, address, D.O.B, work history, salary, medical/health history and contact information, we will do so in line with our retention policy.

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 data and sensitive data.

Security measures

We have appropriate technical and organisational security measures in place to ensure the security of your information and to protect it against deliberate or accidental manipulation, destruction, loss or unauthorised access. Despite our efforts regarding security it is important to bear in mind that the internet is not a secure means of communication. Personal information communicated through the internet may be intercepted by other people. We cannot guarantee the security of personal information sent to us through this website. By using this website and entering your personal data, you accept that you use this website at your own risk.

Cookies policy



A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.

What types of cookies do we use?

We use two types of cookies on our website:

1) 'session cookies'

These are temporary cookies, which only exist in the period you access the website (or more strictly, until you close the browser after accessing the website). Session cookies help our website remember what you chose on the previous page, therefore avoiding having to re-enter information. On our website, these cookies do not contain personal information, and cannot be used to identify you.

2) 'persistent cookies'

These are cookies remain on your device after you have visited our website. These cookies help us to identify you as a unique visitor (by storing a randomly generated number).

Why do we use cookies?

To tailor our website so that it meets your specific needs, we use different technologies, including cookies, which allow us to distinguish you from other users of our website.

We use cookies:

- To recognise and count the number of visitors and pages or various parts of a page they have visited on our site;
- To remember if you have already replied to a survey pop-up that asks you if the content was helpful or not (so that you won't be asked again);
- To remember if you have agreed (or not) to our use of cookies on this site;
- To see how visitors move around the site when they are using it, for example, we use Google Analytics, popular web analytics services. The web analytics services use cookies to help us to analyse how visitors use our site. This helps us to improve the way our website works, for example, by ensuring that visitors are finding what they are looking for easily. Find out more about how these cookies are used on Google's Privacy site <https://tools.google.com/dlpage/gaoptout?hl=en>
- To improve and monitor the advertisement and marketing we offer to our visitors, based on our visitor's interest and activity.
- Within our online application forms and client staff search facility. Without cookies enabled our client's will not be able to use the staff search section of our site.

In summary, by using cookies we are able to improve your experience when you browse our website and enable us to continually improve our site and our services for you. Our cookies



have been set in our browser and we will assume you are ok with them via your continuous use of our website. You can disable certain cookies as set out below. If you disable these cookies we cannot guarantee how the site will perform for you.

Managing your cookies

Enabling cookies will ensure you receive the optimum user experience from our website.

Most browsers automatically accept cookies, but you can deactivate this function at any time and set your browser to notify you whenever a cookie is sent. You can use your browser settings to block all or some cookies. Please note that if you do block all cookies you may not be able to access all or parts of our site.

Amending your cookie settings is different in different browsers, for ease, we've included instructions on amending your settings in the most popular browsers below:

How to check cookies are enabled on windows platforms

Microsoft internet explorer 7, 8 & 9

- Select 'Tools' from the top menu of your browser and then select 'Internet options', then click on the 'Privacy' tab
- Ensure that your Privacy level is set to Medium or below, which will enable cookies in your browser
- Settings above Medium will disable cookies

Mozilla firefox

- Select 'Tools' from the top menu of your browser and then select 'Options'
- Then select the Privacy icon
- Click on Cookies, then select 'allow sites to set cookies'
- Google Chrome
- Select 'Tools' from the top menu of your browser and then select 'Options'
- Click the 'Under the Hood' tab, locate the 'Privacy' section, and select the 'Content settings' button
- Now select 'Allow local data to be set'

safari

- Select the cog icon' from the top menu of your browser and then select 'Preferences'
- Select 'Security and, check the option that says 'Block third-party and advertising cookies'
- Click 'Save'



Microsoft internet explorer 5.0 on osx

- Select 'Explorer' from the top menu of your browser and select 'Preferences' options
- Scroll to the 'Cookies' option under Receiving Files
- Select the 'Never Ask' option
- Safari on OSX
- Select 'Safari' from the top menu of your browser and select the 'Preferences' option
- Click on 'Security' then 'Accept cookies'
- Select the 'Only from site you navigate to'

other browsers

If you are using a different browser please consult your product documentation, online help files or the browser manufactures website.

our legal bases for processing your data

legitimate interests

Article 6(1)(f) of the GDPR is the one that is relevant here – it says that we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

Please note that in certain of the jurisdictions in which we operate, a different legal basis for data processing might apply in certain cases.

Candidate data:

We think it's reasonable to expect that if you are looking for employment or have posted your professional CV information on a job board or professional networking site, you are happy for us to collect and otherwise use your personal data to offer or provide our recruitment services to you, share that information with prospective employers and assess your skills against our bank of vacancies. Once it's looking like you may get the job, your prospective employer may also want to double check any information you've given us (such as the results from psychometric evaluations or skills tests) or to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with local laws. We need to do these things so that we can function as a profit-making business, and to help you and other candidates get the jobs you deserve.

We want to provide you with tailored job recommendations and relevant articles to read to help you on your job hunt. We therefore think it's reasonable for us to process your data to make sure that we send you the most appropriate content.



We also think that it might help with your job search if you take part in our specialist online training or some of our more interactive services, if you have the time. These are part of our service offering as a business, and help differentiate us in a competitive marketplace, so it is in our legitimate interests to use your data for this reason.

We have to make sure our business runs smoothly, so that we can carry on providing services to candidates like you. We therefore also need to use your data for our internal administrative activities, like payroll and invoicing where relevant.

We have our own obligations under the law, which it is a legitimate interest of ours to insist on meeting! If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection, tax collection or actual or anticipated litigation.

client data:

To ensure that we provide you with the best service possible, we store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations, meetings, registered jobs and placements. From time to time, we may also ask you to undertake a customer satisfaction survey. We think this is reasonable – we deem these uses of your data to be necessary for our legitimate interests as an organisation providing various recruitment services to you.

supplier data:

We use and store the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of our suppliers. We also hold your financial details, so that we can pay you for your services. We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

PEOPLE WHOSE DATA WE RECEIVE FROM CANDIDATES AND STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:

If you have been put down by a candidate or a prospective member of staff as one of their referees, we use your personal data in order to contact you for a reference. This is a part of our quality assurance procedure and so we deem this to be necessary for our legitimate interests as an organisation offering recruitment services and employing people ourselves.

If a candidate or staff member has given us your details as an emergency contact, we will use these details to contact you in the case of an accident or emergency. We are sure you will agree that this is a vital element of our people-orientated organisation, and so is necessary for our legitimate interests.

consent

In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.



Article 4(11) of the GDPR states that (opt-in) consent is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her." In plain language, this means that:

- You have to give us your consent freely, without us putting you under any type of pressure;
- You have to know what you are consenting to – so we'll make sure we give you enough information;
- You should have control over which processing activities you consent to and which you don't. We provide these finer controls within our privacy preference centre; and
- You need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

We will keep records of the consents that you have given in this way.

We have already mentioned that, in some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you which are related to the recruitment services we provide as long as you do not actively opt-out from these communications.

- Please note that in certain of the jurisdictions in which we operate, we comply with additional local law requirements regarding consenting to receive marketing materials.
- As we have mentioned, you have the right to withdraw your consent to these activities. You can do so at any time, and details of how to do so are the following

Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities (for example, for our marketing arrangements or automatic profiling), you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

Data Subject Access Requests (DSAR): You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. We may ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.



How you can get in touch with us:

To access, amend or take back the personal data that you have given to us;

If you suspect any misuse or loss of or unauthorised access to your personal information;

To withdraw your consent to the processing of your personal data (where consent is the legal basis on which we process your personal data);

with any comments or suggestions concerning this Privacy Policy

You can write to us at the following address:

Head Office: 15 Clarence Road, Southend, Essex, SS1 1AN

Alternatively, you can send an email to: info@datarevolutionhr.com

How you can get in touch with us to update your marketing preferences

You can do this by emailing us at info@datarevolutionhr.com



DATA REVOLUTION