



Client Privacy Notice

Version: 6
Date: 03/08/2020
Author: Optindigo.com
Stored: Local

Privacy Statement

Privacy Statement Summary:

We take your privacy seriously and will only use your personal information to provide the services you have requested from us and to send you information about services, vacancies and other information you may be interested in. We will never sell, share or use your personal information other than as described here.

Who will use my data?	KALEIDOSCOPE RECRUITMENT LTD.
What for?	We will store and process your data in order to allow us to provide our services to you as a recruitment specialist. This policy relates to all data we collect from recruitment professionals and companies involved in the recruitment and employment industry including clients, agents, recruitment companies, employment consultants, etc....
What will happen if I contact you?	If you contact us as a client with possible vacancies to fill or with other related requests, we will use your information to send any requested information as well as updates and other information that we think you will be interested in as well as updates relevant to the positions advertised.
What data will be stored?	As a client, potential employer, agent, or other recruitment professional we will store any data required in order to provide our services to you and meet any contractual obligations. This might include your contact details, company information, key contact information within the organisation, and data relating to other third-parties as required to provide our services and manage our relationship.
What data will be shared?	We will only share data with carefully managed third-parties as required to provide the services that we offer. We will only share information with the third parties detailed in this policy and always as you would reasonably expect. We may need to share your information with regulators or legal bodies that request it as well as any parties relevant to the application process
How long?	Your data will be stored only for 7 years following the last contact we have with you, after which time your data will be deleted.
Who can access my data?	Your data will be stored securely and access will be strictly controlled. Access to your data will be limited to authorised people within our organisations where they have a legitimate reason to access your data.
How is my data kept secure?	We will store your data on secure servers and systems including online and cloud based systems. We use approved security protocols and technology to secure your data and ensure we keep your data safe.

About This Privacy Policy

This policy sets out how we will use and share the information that you give us. This policy describes your relationship with KALEIDOSCOPE RECRUITMENT LTD. The General Data Protection Regulation (GDPR) describes how organisations must collect, handle, process and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not

disclosed unlawfully. GDPR is underpinned by eight important principals. These say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than is necessary
- Processed in accordance with the rights of the data subjects
- Be protected in appropriate ways
- Not be transferred outside the European Economic Area, unless that country or territory also ensures an adequate level of protection

This policy helps to protect us from data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.
- Any other loss or damage caused by failure to meet our data protection obligations

Who We Are And How To Contact Us

KALEIDOSCOPE RECRUITMENT LTD is registered in UK and is registered with the Information Commissioner's Office. The data controller is: Caroline Bayman. You can contact us in any of the following ways:

Email: caroline.bayman@kaleidoscope.group

Phone: 07721313064

Website:

<https://www.kaleidoscope.group/ourservices/?tab=Kaleidoscope%20Recruitment>

Post: Kaleidoscope Recruitment Ltd. 55 Old Church Lane, Stanmore, United Kingdom, HA7 2RG

Who this privacy policy applies to

KALEIDOSCOPE RECRUITMENT LTD. is a Recruitment and Employment Placement Services. This policy applies to individuals who have shared their data with KALEIDOSCOPE RECRUITMENT LTD as either a client, potential client, business contact, or supplier and to other individuals whose details we collect

store, and process in order to promote, develop and operate our company. Processing of your data is required in order to provide our recruitment services and to grow our business.

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This can include:

- Names of Individuals
- Postal addresses
- Email Addresses
- Telephone numbers
- Other personal information as require

What this policy applies to

This section describes the lawful basis for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect. This includes:

- The Information you provide when you contact us to discuss our services
- Information we collect when we discuss using our services
- Information we collect about how you use the website
- Information you provide when you visit our social media sites.
- Information that you provide to us when signing up to any lists to receive correspondence from us
- Information relating the services we provide to you and other transactions including financial and other personal information required to complete these transactions and manage our relationship
- Information we collect from public domain sources, directories, other third-parties, as required for us to grow and develop our business
- Information that is given and stored as part of our ongoing relationship

We do not routinely collect or process sensitive data about you however where this happens we will take appropriate precautions to protect your data.

How your information will be used

We will only use your personal data for the purposes for which we collected it and as you would reasonably expect your data to be processed and only where there is a lawful basis for such processing, for example:

Purpose/Activity	Type of data	Lawful basis for processing
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To register you as a new client	(a) Identity, (b) Contact	Performance of a contract with you and/or with your consent.
To process and deliver our services you request including recruitment and employment services, managing payments, fees and charges, and to collect and recover money owed to us	(a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary for our legitimate interests to recover debts owed to us (c) with your consent (d) in our legitimate interest
To manage our ongoing relationship with you which will include notifying you about changes to our terms, recruitment services, or privacy policy, to maintain our records	(a) Identity, (b) Contact, (c) Profile, (d) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary to comply with a legal obligation, (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services (d) with your consent
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity, (b) Contact, (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise, (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications, (f) Technical	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical, (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity, (b) Contact, (c) Technical, (d) Usage, (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business
To grow and develop our business – to identify clients that may be interested in our services.	(a) Identity, (b) Contact, (c) Technical, (d) Usage, (e) Profile	(a) Necessary for our legitimate interests to develop our products/services and grow our business. (b) With your consent.

In accordance with your preferences, we may also use your personal information to provide you with information about services that may be of interest to you. This document explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services communications, including communications in relation to any purchases you make or services you use.

How to change your preferences

We operate in line with EU GDPR (May 2018) data protection guidelines. We respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities, namely the Information Commissioner's Office. Any requests or objections should be made in writing to the Data Controller or you can visit our website, call, or email us to contact us to change your preferences at any time.

By submitting your personal data on this site, when you contact us, and as required for us to provide our services to you, you are affirming your agreement for such information to be used in accordance with this privacy policy. You will be able to change your preferences at any time by the methods described as prescribed in this document.

We may from time to time use your information for marketing, account management or relationship management purposes. The main purpose of this is to provide you with information about services which we think may be of interest to you and/or to maintain any existing relationship we may have with you.

Opting out at a later date

Where you give your consent for us to process your data, for example when you agree to us sending you marketing information or where you agree to us processing financial data, you can contact us to amend or withdraw your consent at any time. You can also choose to object to processing and request deletion of your data. We respect all user rights as defined in GDPR. If you have any comments or wish to complain please contact us.

How we store and process your data

Your data will be collected stored and processed securely, we may transfer your data outside the EU, where this is the case will ensure appropriate technical, procedural, and contractual controls are in place to protect your data. Your data will be stored for up to 7 years to ensure we have records of service, payments, and other interactions we have with you.

In order to provide our services to you, we use recognised third parties to support our services. This includes companies to operate our recruitment platform, manage our data, take payment, manage our company accounts and provide banking services. We will store transactions, payment and order data for up to 7 years or for as long as required by UK financial and company regulations. These third parties may operate outside the EU, if this is the case we will ensure precautions are in place to protect your data.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us. If we need to use your personal data for a purpose unrelated to

the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may be legally obliged to disclose your personal information without your knowledge to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings; in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

You will only receive marketing communications from us if you have:

- Requested information from us or purchased goods or services from us
- If you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications
- You have not opted out of receiving marketing

We will get your explicit consent before we share your personal data with any third party for marketing purposes.

Our obligations

We are a data controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the GDPR (2018) in the way we use and share your personal data. Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Third Parties

We may have to share your personal data with the parties set out below for the purposes described in this document:

For clients [for example]:

- Within Kaleidoscope Group Limited, Kaleidoscope Mentoring Limited and Kaleidoscope Foundation, and
- Candidates / employees / workers that may be interested in any vacancies
- with Consultants or contractors to Kaleidoscope Group for the purposes of training, coaching or other support function to ensure our candidates meet any vacancy role requirements.
- Recruitment platform: <https://www.voyagersoftware.com/voyager-infinity/>
- Social media sites [LinkedIn, Facebook, etc...]
- Microsoft Sharepoint for document storage / collaboration
- Zoom / Teams and other video conferencing and communication sites
- Jobs Boards [CVLibrary and others...]
- Our Job Coaches and approved representatives
- Other products and platforms as required to run our business

For all users of our services:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance and accounting services.

- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.
- Other third parties as required to grow, develop, and promote our business

We will take reasonable steps to ensure all third parties with whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions and will ensure appropriate contracts and controls are in place to protect your data.

We will never transfer sensitive personal data to any third party or transfer your sensitive data outside of the EU without your explicit consent.

Use of AI and Combined Data

We do not use AI or Machine Learning however we may combine the data you provide to us directly with data from other sources.

Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours. If you have any queries or concerns about your data usage, please contact us.

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We

only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

As well as your ability to accept or reject cookies, we also require your permission to store cookies on your machine, which is why when you visit our site, you are presented with the ability to accept our terms of use, including the storage of cookies on your machine. Should you not accept then you are free to leave our website, at any time.

Contacting us, exercising your information rights and Complaints

If you any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact: Caroline Bayman at KALEIDOSCOPE RECRUITMENT LTD. We will process SARs within 30 days, SAR responses are usually free, but we reserve the right to charge for excessive or unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities. If you remain dissatisfied, then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk

Privacy Policy Document History

Date	Changes made	By
03/08/2020	FINAL VERSION AGREED	AB & CB