

## **Client Privacy Policy**

KTM Recruitment Solutions Limited is committed to protecting and respecting your privacy. We have created this policy to inform you and make sure we are transparent about our processes. This policy might be subject to changes and updates. This version was last updated on 24 May 2018.

This Data Processing Notice applies to you if you (1) are a representative of any of our (prospective) clients or suppliers (e.g. umbrella companies), (2) you reside within the European Union and (3) if your personal data is processed on KTM Recruitment Solutions Limited database and other internal systems.

When you use our services, you trust us with your personal data. This Data Processing Notice is meant to help you understand what personal data we collect, why we collect it, and what we do with it. Furthermore, it will briefly outline your rights as a data subject. This is important, and we hope you will take time to read it carefully. Your new rights under GDPR will only apply once the GDPR comes into effect on 25 May 2018.

## **General Data Protection Regulation**

In accordance with the General Data Protection Regulation (EU) 2016/679 ('GDPR') that comes into effect on 25 May 2018, KTM Recruitment Solutions Limited is obliged to issue a Data Processing Notice if we store your personal data in our database.

The GDPR is a new regulation which replaces the Data Protection Directive 95/46. The GDPR aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

This Data Processing Notice will outline:

1. KTM Recruitment Solutions Limited as a data controller
2. Which personal data KTM Recruitment Solutions Limited collect and how we collect it
3. Why we hold your data and legal basis
4. How long will we store your data
5. What are your rights under GDPR
6. Automated decision making
7. Lodging a complaint
8. Changes to this Data Processing Notice
9. Contact details for GDPR and data queries

### **1. Identity and contact details of the Data Controller**

KTM Recruitment Solutions Limited will be what's known as the 'Controller' of the personal data you provide to us. KTM Recruitment Solutions Limited

KTM Recruitment Solutions Limited is headquartered in the UK and has one member of staff with one computer.

Our offices address is: KTM Recruitment Solutions Limited, 207 Radstock Way, Merstham, Surrey RH1 3NQ.

Your personal data will be stored specifically in our outlook folders and our excel spreadsheet. Your personal data can, therefore, only be accessed by one staff member (Megan Green – Director).

We may disclose your personal information to third parties in the event that we sell or buy any business or assets, in which case we will have to disclose your personal data to the prospective seller or buyer of such business or assets. We may moreover be under a duty to disclose or share your personal data in order to comply with any legal obligation, to defend our business against a legal claim or in order to enforce or apply our standard terms of business or other agreements, or to protect the rights, property or safety of KTM Recruitment Solutions Limited, our customers, or other parties.

## **2. Which personal data KTM Recruitment Solutions Limited collects and how we collect it**

KTM Recruitment Solutions Limited will collect the following personal data:

- Your full name
- Job title
- Job function
- LinkedIn profile
- Your email addresses
- Your (mobile) telephone number
- Your company details (location, department)

This information may be received from you individually, but KTM Recruitment Solutions Limited is a recruitment company who acquires details from various sources e.g. through job boards, your company website, candidate referrals etc. When we process your data, our Recruitment Consultants will inform you as soon as possible of collecting the data of the source your personal data originates from. If this information is not provided, please let us know straight away and we will confirm how we located your data.

## **3. Why we hold your data and legal basis**

KTM Recruitment Solutions Limited will collect your information to carry out our core business and ancillary activities; in particular, KTM Recruitment Solutions Limited will collect your personal data for the following purposes:

- Providing you with information about current or prospective candidates;
- Communicating with you to identify opportunities for your business;
- Contacting you in relation to the performance of a contract with your organisation;
- Evaluating your experience with KTM Recruitment Solutions Limited and our recruitment process;
- Keeping your business updated by means of regular newsletters and how we can better support you to find the right candidate for the job

The legal basis under the current laws for collecting and processing your personal data is legitimate interests pursued by KTM Recruitment Solutions Limited. We have carried out a three-part test (a so-called legitimate interest's assessment).

KTM Recruitment Solutions Limited will need to process this data to build and maintain relationships with its clients and suppliers. We also need your details to provide the best possible services to our clients, candidates, suppliers, and other business partners.

Furthermore, to support our candidate's career aspirations and our client's resourcing needs, we require a database of client and supplier representative data containing historical information as well as current points of contact. We will only collect information that is necessary to satisfy our legitimate business interests. Furthermore, if KTM Recruitment Solutions Limited has entered into a contract with your organisation or is in the process of entering into a contract, it moreover may need your personal data for the performance of a contract as you may be signing some of the contracts on behalf of your organisation.

#### **4. How long will we store your data?**

Your personal data will be stored in our systems as long as KTM Recruitment Solutions Limited is in touch with your organisation. If KTM Recruitment Solutions Limited enters into an agreement with your organisation it shall keep your data on file for the duration of the client relationship, and six years thereafter unless there is a direct statutory requirement (that comes into force) under which KTM Recruitment Solutions Limited is obliged to keep your data stored in our internal databases for a longer period of time, or KTM Recruitment Solutions Limited needs to hold your data on file for a longer period of time for the purposes of executing an agreement to which your organisation is a party, to comply with a legal obligation or to defend itself against a legal claim. If, however, we never signed a contract with your organisation we will remove your details from our database if we have not been in touch with you for a period of 6 years, or if it appears that you do not work for your organisation anymore.

#### **5. What are your rights under GDPR**

Under GDPR you are entitled to various rights:

- You can request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. This means when working with our Recruitment consultants, make sure you notify us of any changes or update your information like email, phone number etc. when they change.
- You can request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below). This means should you wish to be removed from KTM Recruitment Solutions Limited's database, please email [megan@ktmrs.co.uk](mailto:megan@ktmrs.co.uk). We will review and process your request within 30 days.
- You can object to the processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- You can request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing it.
- You can request the transfer of your personal information to another party in certain formats, if practicable.

All such requests need to be addressed to [megan@ktmrs.co.uk](mailto:megan@ktmrs.co.uk)

The fact that you can lodge a request does not necessarily mean we will grant your request at all times, especially if KTM Recruitment Solutions Limited has legitimate interest that outweighs your interests as an individual.

KTM Recruitment Solutions Limited will, however, provide information without undue delay and in any event within one month (this can be extended to 2 months in exceptional circumstances) of the receipt of the request, however where requests are manifestly unfounded or excessive, in particular, because of its repetitive character, KTM Recruitment Solutions Limited may refuse to act upon your request. In that case, we will inform you within one month of the request of the possibility of lodging a complaint with a supervisory authority (ICO) or seeking a judicial remedy.

## **6. Automated decision-making, including profiling**

KTM Recruitment Solutions Limited will not conduct any forms of automated processing of your personal data consisting of the use of personal data to evaluate certain personal aspects relating to you; in particular, to analyse or predict aspects concerning your performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements. We will not make decisions that are based solely on automated processing which produces legal effects or similarly significantly affects you as a data subject.

## **7. Lodging a complaint**

If you feel that your rights as a data subject have been breached, you are entitled to lodge a complaint with the supervisory authority (in the UK this will be the Information Commissioner's Office via <https://ico.org.uk/concerns/>) or seek a legal remedy. However, we strongly encourage you to contact us via [megan@ktmrs.co.uk](mailto:megan@ktmrs.co.uk) We will then review your complaint at our earliest convenience.

## **8. Changes to this Data Processing Notice**

Any changes we make to our Data Processing Notice in the future will be posted on this website and where appropriate, notified to you by email. Please check back frequently to see any updates or changes to this Data Processing Notice.

## **9. Contact details for GDPR and data queries**

Questions, comments, and requests regarding this Data Processing Notice are welcome and should be addressed to:

Megan Green (Director)  
KTM Recruitment Solutions Limited  
207 Radstock Way  
Merstham  
Surrey  
RH1 3NQ

T: 01737 570 028  
M: 07983 966 838  
E: [megan@ktmrs.co.uk](mailto:megan@ktmrs.co.uk)