

Privacy policy

The Company is a consultancy which provides work-finding and contracting services to its clients and contract-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as via email, referral, or our website, or we may collect them from another online source. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding/contracting services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

1. Collection and use of personal data

A. Purpose of processing and legal basis

The Company will collect and process your personal data for the purposes of providing you with work-finding or contracting services. This includes for example, contacting you about opportunities, assessing your suitability for those opportunities, adding your details to our databases, putting you forward for opportunities (which includes passing your details on to third parties), arranging payments to you and developing and managing our services and relationship with you and our clients.

In some cases we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

The legal bases we rely upon to offer these services to you are:

- Your consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you

B. Legitimate interest

This is where the Company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Managing our database and keeping records up to date;
- Contacting you to seek your consent where we need it;

- Providing services to an individual, including sending their information to clients where they have demonstrated an interest in doing that particular type of work but not expressly consented to you passing on their cv;
- Contacting the individual with information about similar products or services that they have used from you recently.

C. Recipient/s of data

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Clients that we introduce or supply individuals to for the purposes of providing work-finding or contracting services
- Former or prospective employers that you provide as part of the recruitment process
- Banking providers
- Our legal advisers if necessary
- Our internal system and database
- We may use public databases to carry out checks on work-seekers and contractors e.g. Companies House
- Government, law enforcement agencies and other regulators e.g the Police, Home Office, HMRC, Employment Agencies Standards Inspectorate (EASI), Local Authority Designated Officers (LADOs), GLAA

We will always make it clear to you as a work-seeker or contractor where and with whom we are sharing your data.

2. Overseas Transfers

The Company may transfer only the information you provide to us to countries outside the European Economic Area ('EEA') solely for the purposes of providing you with work-finding or contracting services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

3. Data retention

The Company will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time.

Where the Company has obtained your consent to process your personal data, we will do so in line with our retention policy. This stipulates that we will only keep personal data as long as is necessary, and we will review the bases for holding your data in the instance that we have not engaged with you in over 1 year. 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/sensitive data.

4. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;

- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data, you have the right to withdraw that consent at any time by contacting Nimble Approach directly on the contact details provided.

There may be circumstances where the Company will still need to process your data for legal or official reasons. We will inform you if this is the case. Where this is the case, we will restrict the data to only what is necessary for the purpose of meeting those specific reasons.

If you believe that any of your data that the Company processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

5. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Victoria Cooper

E: victoria@nimbleapproach.com T: 0114 345 0540

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

Withdrawal of consent

We take privacy and data protection very seriously, and we respect your right to withdraw your consent for us to process your personal data on our systems. Should you wish to withdraw your consent, please contact us at info@nimbleapproach.com explaining your request, and we will ensure your details are removed immediately.