



## **PRIVACY STATEMENT**

First Class Education and Apprenticeships Limited (FCE) is committed to protecting and respecting your privacy and this notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is the new regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation 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. The Government intends for the GDPR to continue in UK law post-Brexit.

Please read the following carefully to understand our principles and practices regarding your personal data and how we will treat it.

For the purposes of data protection, the data controller is:

- First Class Education and Apprenticeships Ltd of C21A Parkhall, 40 Martell Road, London, SE21 8EN
- Our Data Protection Officer is Mr Peter Cobrin

### **Who We Are and What We Do**

We are a specialist education recruitment agency as defined in the Employment Agencies and Employment Businesses Regulations 2003.

We collect the personal data relevant to the following categories of individuals to allow us to undertake our business:

- Prospective and placed candidates for permanent or temporary roles
- Prospective and live client contacts
- Supplier contacts to support our services
- Employees, consultants, temporary workers

We collect this information to carry out our core business and ancillary activities.

### **Information You Give to Us or We Collect About You**

This is information about you that you give us by phone, e-mail or other forms of communication. It includes information you provide when you register to use our site, to enter our database, subscribe to our services, and when you report a problem with our site.



The information you give us, or we collect about you may include your name, address, private and corporate e-mail address and phone number, financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

When we send a client your CV, it has only your name, general geographical area that you live in, qualifications and employment history. No personal contact details are included. We make it clear to any client that upon receiving your CV that they are responsible for the protection of your data and that if you are not suitable for the client that your CV is deleted as a matter of course.

### **Information We Obtain from Other Sources**

This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, personal recommendations, and others. In this case we will inform you, by sending you this privacy notice, within a maximum of 30 days of collecting the data, of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data. If you do not wish us to retain this data, you must advise us with 14 days of receipt of the privacy notice and we will remove it from our systems.

We are working closely with third parties, business partners, sub-contractors in technical, professional, payment and other services, advertising networks, analytics providers, search information providers, credit reference agencies, professional advisors and others. We may receive information about you from them for the purposes of our recruitment services and ancillary support services.

### **Our Legitimate Business Interest: The Purposes for Processing of Your Data**

We use information held about you in the following ways:

- The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary or permanent engagement
- To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation
- Our service includes to supporting individuals throughout their career and to supporting the resourcing needs and recruitment strategies of our clients

Our legal basis for the processing of personal data is our legitimate business interest, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.



We will rely on legal obligation if we are legally required to hold information on you to fulfil our legal obligations.

We will in some circumstances rely on consent for uses of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate).

## **Consent**

Should we want or need to rely on consent to lawfully process your data, we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing, you have the right to withdraw your consent to this particular processing at any time.

## **Your Data and Use of Our Website Information**

With regard to each of your visits to our site we will automatically collect the following information:

- Your login information if applicable, browser type and version, and country

We will use your information:

- To ensure that content from our site is presented in the most effective manner for you and for your computer
- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- To improve our site to ensure that content is presented in the most effective manner for you and for your computer
- To allow you to participate in interactive features of our service, when you choose to do so
- As part of our efforts to keep our site safe and secure
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you
- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them

We do not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by an FCE team member who will always be involved in the decision-making process.

## **Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.



## **Disclosure of Your Information**

All staff at FCE are GDPR trained to ensure that they are aware of their obligations regarding your personal data and we will share your personal information with selected third parties including:

- Clients for the purpose of introducing candidates to them
- Candidates for the purpose of arranging interviews and engagements
- Clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you

We will also disclose your personal information to third parties:

- If we are under a duty to disclose or share your personal data to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of First Class Education, our customers, or others
- This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction

The lawful basis for the third-party processing will include:

- Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs
- Satisfaction of their contractual obligations to us as our data processor
- For the purpose of a contract in place or in contemplation
- To fulfil their legal obligations

## **Where We Store and Process Your Personal Data**

The data that we collect from you may/will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may/will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services.

By submitting your personal data, you agree to this transfer, storing or processing. We take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.



## **Retention of Your Data**

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so.

We do the following to try to ensure our data is accurate:

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:

- The nature of the personal data
- Its perceived accuracy
- Our legal obligations
- Whether an interview or placement has been arranged
- Our recruitment expertise and knowledge of the industry by country, sector and job role

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

## **Your Rights**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your personal data for marketing purposes.

You can exercise your right to accept or prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at our office or at [Hello@firstclasseducation.org.uk](mailto:Hello@firstclasseducation.org.uk)

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## The GDPR Provides You with the Following Rights

- **To 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
- **To 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)
- **To object to 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 situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes
- **To 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
- **To request the transfer** of your personal information to another party in certain formats, if practicable
- **To make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

## Access to Information

The Data Protection Act 1998 and the GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete. Your right of access can be exercised in accordance with the Act and the GDPR.

A subject access request should be submitted to [Hello@firstclasseducation.org.uk](mailto:Hello@firstclasseducation.org.uk).

## Changes to Our Privacy Notice

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

## Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to [Hello@firstclasseducation.org.uk](mailto:Hello@firstclasseducation.org.uk)