



Signium UK

Privacy Policy

May 2018

**Signium UK**

Canon House, 27 London End, Beaconsfield, Buckinghamshire, HP9 2HN t: +44 (0) 1494 418 200

23 Berkeley Square, Mayfair, London, W1J 6HE t: +44 (0) 20 7036 9990

40 Tavistock Street, London WC2E 7PB t: +44 (0) 20 7430 1711

w [signium.co.uk](http://signium.co.uk)

Snowdon Tate Limited trading as Signium UK, Registered in England and Wales Company No. 5566468

Graham Gill UK LLP trading as Signium UK, Registered in England and Wales Company No. OC347332

## Who are we?

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Signium UK, 40 Tavistock Street, London WC2E 7PB and Canon House, 27 London End, Beaconsfield, Bucks HP9 2HN. We provide executive search and recruitment services to clients looking to recruit personnel for their businesses. We also provide coaching, due diligence, assessments, market reports, salary surveys and consulting services for candidates and clients.

## What does this policy cover?

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We at Signium UK take your personal data seriously. This policy:

- sets out the types of personal data that we collect about you;
- explains how and why we collect and use your personal data;
- explains how long we keep your personal data for;
- explains when, why and with who we will share your personal data;
- sets out the legal basis we have for using your personal data;
- explains the effect of refusing to provide the personal data requested;
- explains the different rights and choices you have when it comes to your personal data; and
- explains how we may contact you and how you can contact us.

## What personal data do we collect about you?

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We collect the information necessary to be able to carry out the work our clients ask us to deliver. This information may include, but not be limited to, CVs, identification documents, educational records, work history, employment, remuneration details, psychometric tests and references.

We may also collect sensitive personal data about you, in the form of bank details, work permit, driving license, criminal records, remuneration and compensation, identifications documents, education records. We only collect sensitive personal data from you, and further process this data, where you have given your explicit consent.

If you are receiving coaching from us, we will also process any additional information that you choose to provide to us with your consent during the course of the coaching.

## Where do we collect personal data about you from?

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The following are the different sources we may collect personal data about you from:

- **Directly from you.** This is information you provide while you are engaged with us as part of a search/recruitment process or via coaching.
- **From an agent/third party acting on your behalf.** e.g. an Interim Management Company or Rec to Rec agency.
- **Through publicly available sources.** We use the following public sources, as well as others from time to time:

- LinkedIn
- Not Actively Looking
- Company website
- Company annual reports
- **By Reference or word of mouth.** For example, you may be recommended by a friend, a former employer, a former colleague, telephone referencing or even a present employer.
- **Due Diligence.** Our 40 Tavistock Street team, which specialises in moving senior lawyers, is at times asked by its clients to produce due diligence reports on prospective hires who are normally senior lawyers. The team would ask the client to get consent from the prospective hire to undertake the due diligence. Once a report is produced it is sent to the client and any information still held is then minimised. At the end of the due diligence process the team also contacts the prospective hire to advise them of our privacy policy.

## How do we use your personal data?

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We use your personal data to help us deliver our services on behalf our clients and to assist you in the development of your career.

We use your personal data to match your skills, experience and education with a potential employer. We will initially collect basic information on you such as contact details, job role and experience and then pass this on to the client in search of personnel. If you are chosen by the client and go through to the next stage we will then be collecting more information from you at the interview (or equivalent) stage and onwards in that manner.

If you are receiving coaching from us, we use your personal data in order to understand more about you and to assist you with understanding your skills and areas for improvement or future opportunities and options.

If we undertake a reference/due diligence exercise the data supplied will be passed to our client. Sources may at times be anonymized.

## How long do we keep your personal data for?

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We only retain your information for as long as is necessary for us to use your information as described above or to comply with our legal obligations. However, please be advised that we may retain some of your information after you cease to use our services, for instance if this is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.

When determining the relevant retention periods, we will take into account factors including:

- a) our contractual obligations and rights in relation to the information involved;
- b) legal obligation(s) under applicable law to retain data for a certain period of time;
- c) statute of limitations under applicable law(s);
- d) (potential) disputes;
- e) if you have made a request to have your information deleted; and
- f) guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

## Who do we share your personal data with?

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We share your personal data with the client we are working with and on whose behalf we will have approached you or the client who has a position to fill, in order to determine with the client whether you are a good fit for the available position.

We may also, if we think it is beneficial to you, share your data within the Signium group internationally.

With your prior permission, we may also share your personal data with selected external contacts where we think there may be interesting career development opportunities available to you.

We may also conduct checks on you to verify the information you have provided and where we do this we may share this information with our clients and staff. We may also share your information with our accountants when applicable for managing payroll or processing invoices, for example in order for us to pay an interim contractor.

## What legal basis do we have for using your information?

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For prospective candidates, interim managers, referees and clients, our processing is necessary for our legitimate interests in that we need the information in order to be able to assess suitability for potential roles, to find potential candidates and to contact clients and referees.

If you are shortlisted as a candidate or we are working closely with you in an assessment of development process, then this may involve the processing of more detailed personal data including sensitive data such as health information that you or others provide about you. In that case, we always ask for your consent before undertaking such processing.

For clients, we may also rely on our processing being necessary to perform a contract for you, for example in contacting you.

## What happens if you do not provide us with the information we request or ask that we stop processing your information?

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If you do not provide the personal data necessary, or withdraw your consent for the processing of your personal data, we may not be able to work with you on potential assignments.

## Do we make automated decisions concerning you?

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As part of our determination of suitability for a specific role, we at times and with a candidate's prior explicit permission, include assessment/psychometric profiling which may be completed online. Results will always be assessed and analysed by trained and certified consultants and so no solely automated decisions will be made.

## Do we use Cookies to collect personal data on you?

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No, we do not use cookies to collect personal data.

## Do we transfer your data outside of the EEA?

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To better help you we may transfer your personal data to clients and partners in countries outside the EEA. These countries privacy laws may be different from those in your home country. Where we transfer data to a country which has not been deemed to provide adequate data protection standards we always have security measures and approved model clauses in place to protect your personal data. To find out more about how we safeguard your information as related to transfers contact us at [privacy@signium.co.uk](mailto:privacy@signium.co.uk)

## What rights do you have in relation to the data we hold on you?

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By law, you have a number of rights when it comes to your personal data. Further information and advice about your rights can be obtained from the data protection regulator in your country.

Rights	What does this mean?
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.
2. The right of access	You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy).  This is so you're aware and can check that we're using your information in accordance with data protection law.

3. The right to rectification	You are entitled to have your information corrected if it is inaccurate or incomplete.
4. The right to erasure	This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your information where there’s no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
5. The right to restrict processing	You have rights to ‘block’ or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be ‘blocked’ to make sure the restriction is respected in future.
6. The right to data portability	You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
7. The right to object to processing	You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities).
8. The right to lodge a complaint	You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.
9. The right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or

- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

## How will we contact you?

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We may contact you by phone, email or social media. If you prefer a particular contact means over another please just let us know.

## How can you contact us?

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If you are unhappy with how we've handled your information, or have further questions on the processing of your personal data, contact us here: [privacy@signium.co.uk](mailto:privacy@signium.co.uk)