



MACKINNON BRUCE

INTERNATIONAL

PRIVACY NOTICE - CANDIDATE DATA (INDIVIDUALS)

Overview

- We will only collect and process the right amount of your personal data from you for the specific purposes that we need it.
- We only use your personal data for clearly defined purposes.
- We have identified the legal basis for the processing of your personal data.
- The service we provide means we do need to share your personal data with other organisations.
- We endeavour to keep your personal data safe and secure at all times
- We may have to transfer your personal data outside of the UK and EU.
- We only keep your personal data for a set period of time.
- You can keep in control of your personal data through the various rights you have.
- We are happy to speak to you about what we do with your personal data.

Personal data collected

To enable us to provide a tailored service specific to meet your needs and find you the most appropriate job opportunities our clients have to offer we need to collect some or all the following information from you:

- Full name
- Email address
- Postal address
- Telephone number(s)
- Nationality
- Employment history
- Details of work, including salary and future employment needs
- Skills and experiences
- Education and qualifications
- Marital status
- Number of dependents
- Any other information you choose to tell us



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Usually we collect this personal data directly from you, however we do sometimes collect this from other sources.

By using our website and sending any email communications our systems may obtain your IP address.

Collecting personal data directly from you

You may provide your personal data to us via one of the following ways:

- Applying for a specific job that is advertised on our website
- Submitting your CV via the candidate services area of our website
- Emailing your CV direct to one of our Consultants
- Leaving your details with a Consultant at a recruitment or graduation fair

Collecting personal data from other sources

We may obtain information about you via one of the following ways:

- We search professional networking sites, such as LinkedIn, and job boards to establish if there are any potential candidates who would be suitable for a job vacancy we are looking to fill.
- Referral from an existing candidate – they may share your personal data with us and ask us to contact you as you are interested in new career opportunities.

What we use your personal data for and the legal basis we rely on

We collect and use your personal data for the following purposes:

- For recruitment purposes, primarily to match you to a job vacancy we are recruiting for on behalf of our clients.
- For marketing purposes, for example to re-contact you in the future to inform you of new opportunities.



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Recruitment purposes

We want to make sure that we can find you the right job opportunity for you, so we need to know certain information about you to enable us to tailor our search to the most relevant client and job they have available. We will gather this information from you or collect from other sources such as LinkedIn.

A consultant who works within your business/market sector will spend time with you discussing your career, lifestyle, etc. to establish the kind of job you are seeking. They will then send a confidential profile to clients and potential client businesses who have or may have a role available within their business that would fit your criteria. This confidential profile will provide the client business with information about you. If they are satisfied with what they have read, we will move forward to providing them with your name and other personal data.

If you have submitted your CV directly to us, we will read and assess this to identify if your career history, skills and experience are a suitable match for one of our vacancies. We may not have any suitable vacancies for you. If you are not contacted within 6 months of sending your CV to us, please accept this as your CV has not been suitable and it will have been removed from our database.

Legal Basis - Consent

When you have made the initial contact with us, for example by applying for a job we are advertising on our website, uploading your CV via the candidate portal of our website, or leaving your CV and details with one of our consultants at a recruitment event you will have consented to us processing your personal data for the purpose of us contacting you to progress your job search application.

We will always obtain your consent to submit your personal data to any of our clients.

Legal Basis - Legitimate Interests

We do not think it is unreasonable for an individual to expect to be contacted by a recruitment agency if they publish details about their professional profile and career history on professional networking sites, such as LinkedIn. Along with searching our own database of candidates we often review professional networking sites and job boards to identify any



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potential candidates who may be suitable to fill a vacancy one of our clients has on offer. If we identify such a candidate, we will make initial contact with them to introduce ourselves and the opportunity available.

We have documented our decision-making for relying on legitimate interests for this purpose in a Legitimate Interest Assessment to ensure our legitimate interests are not overridden by the rights of individuals whose personal data is to be processed. If you would like to know more about the assessment we undertook please contact our Data Protection Manager.

You have the right to object to us processing your personal data on this basis, to exercise this right please contact our Data Protection Manager.

Marketing purposes

We pride ourselves on offering a tailored service to our candidates and would like to be by your side right through your career till retirement (however early or late that might be). We know that for some people there is a need to move to new jobs to enhance their career prospects and progress to the top. We therefore want to keep you informed of any new job opportunities that become available that you may be interested in.

You can change your marketing preferences at any time by contacting our Data Protection Manager.

Legal Basis - Legitimate Interests

We do not think it is an unreasonable expectation for candidates to receive information from ourselves about new opportunities that might be suitable for them. GDPR allows us to use legitimate interests as the lawful basis for direct marketing purposes where this does not breach other e-privacy laws. As there is a relationship in place between ourselves and candidates we can legitimately rely on soft opt-in rules under the Privacy & Electronic Communication Regulations 2003 to undertake email direct marketing.

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Who we will share your personal data with

We will share your personal data with:

- our existing clients who have job vacancies to fill; and
- prospective clients who we feel may be able to provide a suitable career opportunity for you.

We will always ask for your consent to send your personal data to existing or prospective clients.

When we set up a new recruitment business for one of our top performing managers, the manager will take a copy of their client database they built up whilst working for Mackinnon Bruce International. The new business is still owned and controller in the majority by Mackinnon Bruce International.

Your personal data may be accessed and seen by our third-party outsourced IT provider, whilst they undertake work on our behalf. We have a data processor contract in place which sets out both parties responsibilities and obligations under GDPR.

If you enter personal data into our website then it may be accessed and seen by our third-party website host and web data storage provider, whilst they undertake work on our behalf. We have a data processor contract in place which sets out both parties responsibilities and obligations under GDPR.

How we keep your personal data safe

Mackinnon Bruce International take the security of your personal data seriously and we have put in place the most appropriate organisational and technical measures to safeguard personal data. Our measures include:

- Encrypting devices and servers where appropriate



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- Password access to computers and mobile devices
- Secure premises
- Restricting access to those staff who need to see the information
- Internal policies and procedures on data protection and information security
- Staff training

When we use third-party providers to process and/or store personal data we undertake relevant assessments of their business to establish their level of compliance with GDPR and only use those that provide sufficient guarantees to implement appropriate technical and organisational measures to safeguard personal data.

Our website, emails, databases and data storage are all on servers based in the UK and EU.

Transferring personal data outside of the UK and EU

If a job vacancy is located outside of the UK and EU, Mackinnon Bruce International will need to transfer your personal data to that country. As we have said before we always get your consent to give your personal data to one of our clients and you will be made aware that the business is not located within the UK or EU.

How long we will keep your personal data for

We have documented retention periods for all the information we obtain and process.

We will keep your personal data for as long as we have an active communication with you, and once this ceases we will keep your personal data for 10 years before it is deleted from our systems/securely destroyed.

Your rights

You have various rights in relation to how we process your personal data.

- You can access the personal data we keep about you and be given specific information about the processing.



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- You can ask us to update inaccurate personal data we hold about you.
- You can ask us to delete your personal data but only when specific grounds apply.
- You can ask us to restrict the processing of your personal data, for example if you are contesting the accuracy of it.
- You can object to the processing of your personal data if you do not agree with our legitimate interest grounds and for direct marketing purposes.
- You can transfer your personal data from us to another service provider but only when certain grounds apply.

We do not undertake any automated decision-making, including profiling.

Should you wish to exercise any of your rights please contact our Data Protection Manager.

If you are not happy with the way we have been processing your personal data or have not dealt with one of your rights correctly when you have asked us to you may lodge a complaint with the Information Commissioners Office (ICO). The ICO has several ways in which you can get in touch with them, including post, email, and online forms. To find out how click [here](#).

Our contact details

You can contact our Data Protection Manager via one of the following ways:

- Telephone: +44 (0)113 2882860
- Post: Mackinnon Bruce International, Park Row House, Park Row, Leeds, LS1 5JF
- Email: info@mackinnon-bruce.com