



## PRIVACY AND DATA POLICY

From 25 May 2018, the General Data Protection Regulation 2016 will come into force, this replaces the Data Protection Act 1998.

CLS (UK) Infrastructure Limited's privacy and data policy sets out the basis on which we process any personal data that we collect from you or about you that you provide to us or that we receive from other sources. If we ask you to provide information from which you can be identified, including as a result of using our website, it will be used in accordance with this privacy policy.

Catherine Fell at CLS has been appointed our **Data Protection Officer** and she will undertake this role following the principles laid down by the GDPR. She will also be involved in processing any information data. Any issues/queries relating to the regulations and data should be addressed in writing to Catherine Fell. CLS is registered as a data controller with the Information Commissioner's Office under ICO registration reference: ZA398315, company number 9201504.

At CLS (UK) Infrastructure Ltd we operate a construction recruitment business providing temporary and permanent placements within the UK. In order to assign workers to these placements, arrange interviews, offers of and placement in employment we require specific employment data.

To assist you in finding employment and temporary assignments, CLS will process personal data about you such as full name, postal address, email address, and contact telephone numbers. This information can be gathered either through registration on our website or by corresponding with us by phone, email, post, social media etc.

If relevant we may also collect and hold data such as details about your previous work references, occupational health conditions, training achieved, qualifications, proof of eligibility to work in the UK etc to enable us to process payroll in line with current UK employment regulations.

This personal data would relate to applications for a particular role, allowing us to match your details to possible assignments for as long as you require us to do so. We will use your email address and mobile number to provide you with alerts regarding current and future work opportunities suitable to your experience and qualifications.

We may also receive personal data about you from other sources such as Client Managed service companies, Payroll Bureau providers, online job sites, social media etc to provide and maintain your employment position and will co-operate with and report to government agencies and regulatory bodies such as HMRC, the Home Office, Department of Work and Pensions, the Construction Industry Scheme, Pension Regulator, CITB, NPORS etc to ensure that we are meeting our statutory obligations and hold relevant and current information regarding your skill sets.

### **We use our personal data information to;**

- maintain our records and to support and manage our candidates
- provide you with updates and alerts regarding current and future work opportunities
- ensure compliance with statutory and legal obligations
- detect and prevent fraud
- respond to any complaint you might make
- contact you or your next of kin in case of an emergency
- answer any general enquiries

**We will NOT** use your information to conduct market research or for marketing purposes.

**We will NOT** pass on your information to a third party for that party's or any other party's purposes

**We will NOT** sell your information to a third party

### **Sharing your personal data**

We sometimes need to share the personal information either with the individual or other organisations when this occurs we will comply with all aspects of GDPR. These organisations may include but are not limited to:

- financial organisations
- current, past or prospective employers
- educators or examining bodies
- suppliers and service providers
- central government
- credit reference, debt collection and tracing agencies
- business associates
- complainants and enquirers
- professional advisers and consultants
- any legal compliance or obligation

### **Website**

Our website as well as containing important information about our company allows users to register their interest in our services by either sending a CV or completing a contact form. In order for us to provide you with a 'contact back' service, we request personal information on this form. These include: Your full name, email address, contact number, computer IP and browser information.

This information submitted is transmitted securely over SSL and stored in a secure, encrypted database. The information is used to facilitate the 'contact back' service, is retained for as long as necessary, and removed in the event that the purpose has been met or when you no longer wish the data to be held.

We take our duty to protect your personal information and confidentiality seriously. We are committed to taking all reasonable measures to ensure the confidentiality and security of personal data for which we are responsible, whether computerised or on paper.

Data removal can be requested by contacting CLS directly.

When using our website, as with any website, this sometimes involves placing small amounts of information on your device, these include small files known as cookies. They cannot be used to identify you personally.

### **Data storage**

CLS have in place appropriate technical and organisational measures to prevent accidental loss, damage or destruction of your personal data and also to protect your personal data against unauthorised or unlawful use and theft. We have strict confidentiality agreements including data protection obligations with our third-party service providers and data processors.

### **Your rights**

Under the GDPR you have a number of rights in relation to your personal data, you can:

- access and obtain a copy of your data on request
- require CLS to change incorrect or incomplete data
- require CLS to delete or stop processing your data
- object to or restrict the processing of your data by CLS

If you would like to exercise any of these rights, please contact our Data Protection Officer.

### **Failure to provide personal data**

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, CLS may not be able to process your application properly or at all.

### **Changes to our Privacy Policy**

If in the future we make any changes to our privacy policy, the latest version of our privacy policy will be posted on our website.

## IT Data Security

Please rest assured that any and all data held by CLS is securely protected. We do this in the following way:

Your data is held on our secure database which is only accessible to CLS Staff and is password protected at all times.

Our Data Protection Officer (Catherine Fell) has been appointed by the Managing Director to oversee all data security. This is achieved by:

Ensuring the company is registered with the Information Commissioner's Office as a data controller.

Appointing a database provider which uses leading technology and encryption software to safeguard your data and keep strict security standards at all times. Furthermore, our Data Protection Officer will liaise with the providers of our database (Project House) to ensure that the system is always moving forward with regular updates to comply with both legislation requirements and security

Appointing a local IT Specialist (MLC Computing) who fully understand our company's requirements and can ensure that our IT systems (both hardware and software) are kept up to date at all times.

All our computers are protected by a robust antivirus system to prevent any breach of data security.

Finally, everyone working for CLS is subject to the common law duty of confidentiality. Information provided in confidence will only be used for the purposes advised and consented to by the person concerned.

*Catherine Fell*

**Catherine Fell**  
**Managing Director**

**Date: 1 June 2023**