

Swyddle: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS

Introduction

Swyddle LLP ("We") are committed to protecting and respecting your privacy.

This policy (together with our [terms of use](#) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Swyddle LLP is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are:

Postal Address: Swyddle LLP, 31 Timbers Square, Roath, Cardiff, CF24 3SH.

Telephone: 029 2030 2812

Email: post@swyddle.cymru

For all data matters contact: Dafydd Henry (Data Protection Officer) on 029 2030 2182 or post@swyddle.cymru

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

- To inform individuals and organisations of news, events and activities
- To inform of services and offers
- To inform of vacancies advertised
- To match candidates with potential employers
- To match services offered by candidates to businesses and organisations

4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data; name, address, e-mail address and phone number, IP address and cookie ID, financial and credit card information, personal description and photograph, qualifications and certifications.
- Special categories of data; race, ethnic origin, health

We have obtained your personal data from Opt-in pages, direct applications, CV Library and no detail is collected from publicly available sources.

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

<input type="checkbox"/> Consent of the data subject;	When signing up to the service a GDPR compliance form is completed which outlines the contact details required, how data is used, the contact frequency and if and how the data is shared.
<input type="checkbox"/> Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	To match or place candidates with appropriate employers
<input type="checkbox"/> Processing necessary for compliance with a legal obligation	To match or place candidates with appropriate employers
<input type="checkbox"/> Processing necessary to protect the vital interests of a data subject or another person	To meet legal requirements of employers
<input type="checkbox"/> Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	n/a

<input type="checkbox"/> Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	To meet legal requirements of employers, for example, safeguarding
---	--

b) Special categories of personal data (article 9 of GDPR)

[*IF YOU PROCESS SPECIAL CATEGORIES OF DATA, YOU MUST SATISFY AT LEAST ONE CONDITION UNDER ARTICLE 6 AND AT LEAST ONE CONDITION UNDER ARTICLE 9 AS LISTED BELOW. DELETE THIS SECTION IF YOU DO NOT PROCESS SPECIAL CATEGORIES OF DATA.]

Our lawful basis for processing your special categories of data:

<input type="checkbox"/> Explicit consent of the data subject	Special category data shared with potential employers only with explicit consent of the subject
<input type="checkbox"/> Processing necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement	Ethnic/Gender monitoring, right to work in the UK, safeguarding
<input type="checkbox"/> Processing necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent	n/a
<input type="checkbox"/> Processing carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided that the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and there is no disclosure to a third party without consent	n/a
<input type="checkbox"/> Processing relates to personal data manifestly made public by the data subject	n/a
<input type="checkbox"/> Processing necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity	To meet legal requirements of employers
<input type="checkbox"/> Processing necessary for reasons of substantial public interest on the basis of EU or Member State law	n/a

<input type="checkbox"/> Processing necessary for reasons of preventative or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional	To meet legal requirements of employers and health and safety requirements
<input type="checkbox"/> Processing necessary for the reasons of public interest in the area of public health	
<input type="checkbox"/> Processing necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes	

[*TICK MORE THAN ONE BOX, IF MORE THAN ONE APPLIES BUT INDICATE WHICH PURPOSE IT REFERS TO..]

More information on lawful processing can be found on the [ICO website](#).

6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with appropriate potential employers.

7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary for a period of 12 months in case of any legal claims/complaints and/or for safeguarding purposes.

8. Providing us with your personal data

You are under no statutory or contractual requirement or obligation to provide us with your personal data. But failure to do so will have the following consequences;

- We will not be able to provide your details for consideration by potential employers.
- You will not be kept informed of services, offers and other useful information

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- [THE RIGHT TO WITHDRAW YOUR CONSENT TO THE PROCESSING AT ANY TIME, WHERE CONSENT WAS YOUR LAWFUL BASIS FOR PROCESSING THE DATA];
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);

- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

If any data is transferred outside the EEA it will only be done under an EU Model contract or under Privacy Shield.

11. Automated Decision Making

Automated decision making is made only to enhance the relevance of marketing information being provided.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy 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 policy.

14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Dafydd Henry (Data Protection Officer) on 029 2030 2182 or post@swyddle.cymru.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.