



IBS respects your privacy and is committed to protecting your personal data. This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you contact us to enquire about our services, sign up to our newsletter, contact us by using our enquiry form, by telephone, email or post, leave a review, or apply for a job with us. It also explains your rights in relation to your information and how to contact us or supervisory authorities in the event if you are unhappy with how we are processing your data.

This policy applies to all data, whether it is stored electronically, on paper or on other materials.

## **1 Overview**

- 1.1 International Business Solutions Consulting (the "Company", "we", "us" or "our") obtains, keeps and uses information about you for a number of specific lawful purposes. The Company is a "data controller" which means that we are responsible for deciding how we hold and use personal information about you. Although we are the initial data controller, once we pass on your information to our clients (with a view of employing or engaging you) they may become a data controller in their own right. In this instance we may become joint data controllers in respect of your data. The term "jointly" is used where two or more persons (organisations) act together to decide the purpose and manner of any data processing. The term in common applies where two or more persons share a pool of personal data that they process independently of each other.
- 1.2 The Company takes the security and privacy of data seriously and is committed to complying with its legal obligations under the Data Protection Act 2018 (the '2018 Act') and the EU General Data Protection Regulation ('GDPR') in respect of data privacy and security. Our use of your personal data is subject to your instructions, the GDPR and any other relevant UK and EU legislation.
- 1.3 This privacy notice comes into effect on the 1 March 2019. It is important that you read this privacy notice together with any other privacy notices we may provide on specific occasions. This privacy notice supplements the other notices and is not intended to override them. We are required to notify you of this information under data protection legislation.
- 1.4 We are committed to complying with our data protection obligations, and to being concise, clear and transparent about how we obtain and use personal information or sensitive personal information and how (and when) we delete that information once it is no longer required.
- 1.5 We will review and update this notice regularly in accordance with our data protection obligations. We will circulate any new or modified policies or notices in relation to your data when it is adopted on our website. It is important that you read and understand this notice before you send us any data.
- 1.6 This website is not intended for children and we do not knowingly collect data relating to children.
- 1.7 If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us by emailing to [info@ibs-c.co.uk](mailto:info@ibs-c.co.uk) by telephone + 44 (0) 208 088 0102 or by writing to us to 27 Parsons Green Lane, London, SW6 4HH
- 1.8 We hope that we can resolve any query or concern you raise about our use of your information. However, if you feel that we have failed to address your concerns appropriately, you can contact the Information Commissioner at [ico.org.uk/concerns/](https://ico.org.uk/concerns/) or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.



## **2 Third Party Links**

- 2.1 Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **3 Data Protection Principles**

- 3.1 When processing your data, the Company will comply with the following data protection principles when processing information:
- 3.1.1 we will process personal information lawfully, fairly and in a transparent manner;
  - 3.1.2 we will collect personal information for specified, explicit and legitimate purposes only, and will not process it in a way that is incompatible with those legitimate purposes;
  - 3.1.3 we will only process the personal information that is adequate, relevant and necessary for the relevant purposes;
  - 3.1.4 we will keep accurate and up to date personal information, and take reasonable steps to ensure that inaccurate personal information is deleted or corrected without delay;
  - 3.1.5 we will keep personal information in a form which permits identification of data subjects (you) for no longer than is necessary for the purposes for which the information is processed; and
  - 3.1.6 we will take appropriate technical and organisational measures to ensure that personal information is kept secure and protected against unauthorised or unlawful processing, and against accidental loss, destruction or damage.

## **4 How we define processing**

- 4.1 The Company will process your personal data in accordance with our obligations under the data protection legislation.
- 4.2 **‘Processing’** means collection, recording, organisation, structuring, storage, adaption, alteration, retrieval, consultation or use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, destruction or erasure of personal data. This includes processing personal data which forms part of a filing system and any automated processing.

## **5 What data we collect**

- 5.1 The Company processes information about you ‘data subjects’ for a number specific lawful purposes and we seek to ensure that our data collection and processing is always proportionate.
- 5.2 **‘Personal data’** is information which relates to a living person who can be identified from that data (data subject) on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymised data.

- 5.3 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:



**Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

5.3.1 **Contact Data** includes billing address, delivery address, email address and telephone numbers.

5.3.2 **Financial Data** includes bank account and payment card details.

5.3.3 **Transaction Data** includes details about payments to and from you and other details of the services purchased, discounts applied and any refunds that we make to you.

5.3.4 **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

5.3.5 **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

5.3.6 **Usage Data** includes information about how you use our website, products and services.

5.3.7 **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

5.3.8 **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be used in accordance with this privacy policy.

## 6 Basis for processing data

6.1 We have set out below a description of what data we collect, where and how we obtain the data from, the purpose of collecting it, how we will use it and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate, what happens if you do not provide the information and who we may share it with and why.

6.2 We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We collect the personal data of the following types of people to allow us to undertake our business;

6.2.1 Prospective and placed candidates for permanent or temporary roles;

6.2.2 Prospective and live client contacts;

6.2.3 Supplier contacts to support our services;

6.2.4 Employees, consultants, temporary workers, volunteers and interns.

6.3 Given the nature of our business we routinely introduce candidates to clients for permanent employment, temporary worker placements or with a view of the candidates entering into independent professional contracts

with clients. We also support our clients with their human resourcing needs. We therefore must collect appropriate personal data of our candidates and clients as it is a fundamental and essential part of our business.

- 6.4 We have to have a valid lawful basis in order to process your personal data. We will generally process your personal data in the following circumstances:



- 6.4.1 We need this information in order to take steps at your request prior to entering into a contact with you or for the performance of a contract with you or a third party.
- 6.4.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service to candidates and clients. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Where we process your information under this lawful basis, we will specify legitimate interests accordingly. We need to process this data in order to maintain, expand and develop our business.
- 6.4.3 Where we need to comply with a legal or regulatory obligation that we are subject to. For example if you are a candidate, we may need to verify your right to work in the UK.
- 6.4.4 Where you have provided us consent. Generally, we do not rely on consent as a legal basis for processing your personal data but may in certain circumstances request for your explicit consent to process your data. If we do so, we will advise you on the purpose of that data collection, how we will process it and will request your explicit and clear consent for us to process that data for that purpose. Where we rely on your consent to process your data, you will be able to withdraw your consent at any time.
- 6.5 Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out below.
- 6.6 The Company may from time to time and in very limited circumstances may need to process sensitive personal information.
- 6.7 We will only process sensitive personal information if we have a lawful basis for doing so as set out in paragraph 0 and one of the special conditions for processing sensitive personal information applies, eg:
- 6.7.1 you have given us explicit consent;
- 6.7.2 the processing is necessary for the purposes of exercising the employment law rights or obligations of the Company or you;
- 6.7.3 processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
- 6.7.4 processing relates to personal data which are manifestly made public by you;
- 6.7.5 the processing is necessary for the establishment, exercise or defence of legal claims;

6.7.6 the processing is necessary for reasons of substantial public interest.

## **7 How we process your data**

### **Website Users**

7.1 When you use our website we may:



- 7.1.1 automatically collect Technical Data, Usage Data and Aggregate data about your equipment, browsing actions and patterns. We collect this data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. We will obtain this information from you or third parties such as analytics providers (eg google), which is based outside the EU;
- 7.1.2 collect this information for the purpose to administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- 7.1.3 collect this data as it is necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise);
- 7.1.4 will share the information we receive with relevant personnel within company, i.e. those responsible for the IT aspect of the business and third-party service providers responsible for our website maintenance;
- 7.1.5 collect this information automatically when you use our website. If you do not wish for this information to be collected, please do not use our website.
- 7.1.6 If you enquire about our services you may give us your Identity, Contact and Marketing and Communications Data by filling in forms on our website, by corresponding with us by post, phone or email and in face to face meetings. If you then place an order we will process your Financial and Transaction data. We will obtain this information from you and collect this information for the purpose of determining if we are able to provide you with services or contact you, respond to your queries etc.

### **Clients:**

- 7.2 If you become a Client, in addition to you Identity, Contact and Marketing and Communications Data we will collect your Financial Data and Transactional Data. We will collect this data from you, public sources (such as linkedin, companies house, search engines) and for the purpose of ensuring that we are able to comply with our contractual obligations.
- 7.3 We collect this data as it is necessary in order for us to enter into a contract with you and for our legitimate interests (to grow our business, maintain appropriate records, provide you with the list of our services, list of candidates, fees and other information, to receive payment from you and to pay candidates) and to comply with our legal/regulatory obligation i.e. to determine if we can provide you with the services, maintain appropriate records for tax and legal purposes.
- 7.4 We will share the information we receive with relevant personnel within company, i.e. to pass messages or information so that that personnel may respond to your enquiry, assist you to place an order or with any external companies that provide services to you on our behalf. We will also share this information with shortlisted candidates.

- 7.5 If you do not provide this information we may not be able to contact you or take necessary steps to enter into a contract with you.



- 7.6 We may in very limited circumstances collect your sensitive personal data. You may wish to provide us with sensitive data in relation to your health (i.e. disability) by requesting us to make reasonable adjustments on how we communicate with you or if we need to make special adjustments so that we can provide you with our services or sell to you our goods. The legal condition for processing such data is establishment, exercise or defence of legal claims (i.e. so that we can show that we have treated you fairly and in accordance to our legal obligations). It is important to note that while you do not have to provide us with this information, once you do, we may need to retain this data for the establishment, exercise or defence of legal claims even if you withdraw your consent.

#### **Promotional Communications:**

- 7.7 When you subscribe to our service or publications (i.e. by signing up to receive our newsletter on our website); request marketing to be sent to you; enter a competition, promotion or survey; or give us some feedback we will collect your Identity Data, Contact data and Marketing and Communications Data.
- 7.8 We will obtain this information from you or obtain this information from publicly available sources (i.e. LinkedIn, Companies House, search engines).
- 7.9 Collect this information so that we can send you our newsletters, to deliver relevant website content and advertisements to you, notify you of updates and promotions, send you information's to our events or events of our partners, or to introduce our new services and measure or understand the effectiveness of the advertising we serve to you.
- 7.10 We will collect this data as it is necessary for our legitimate interests (to keep in touch with our clients, to study how customers use our services and promote them, to grow our business and to improve our marketing strategy).
- 7.11 We will share the information we receive with relevant personnel within our company, i.e. those responsible for the IT or marketing aspects of the business and third - party service providers responsible for our website maintenance and marketing or software providers. You will be able to opt out of receiving any further promotional material from us.

#### **Candidates**

- 7.12 When you apply for work with us or with one of our clients (whether as an employee, worker, contractor, volunteer or intern), we may process your Identity and Contact Data as well as:
- 7.12.1 **Background Data:** includes any other information that you provide on your application form, CV, cover letter, during your interviews, assessments and may include employment history, qualifications, membership of any professional bodies, hobbies and interests.
- 7.12.2 **Referee Data:** Details of personal or educational referees, details of former employers the details of which you have provided us with so that we can contact them to obtain a reference from them.

7.12.3 **Performance Data:** More detailed information about your academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance details and information and verification regarding your academic and professional qualifications or verification of your membership of a professional body.

7.12.4 **Membership Data:** Information in relation to your membership of any professional bodies.

7.13 We will obtain this information from you, another recruitment agency, previous employer (with your consent) or publicly available sources (i.e. LinkedIn).



7.14 We will collect your personal data so that we can take steps prior to entering into a contact with you and for legitimate interests (so that we can fill the roles that become available within the company or with our clients; communicate with you to arrange interviews; decide whether to employ (or engage) you; to make applications on your behalf or recommend you as a prospective candidate to our clients, decide or help our client decide what other terms of your contract to offer you; verify the qualifications or employment information provided by you, and if we or our client decides to offer you a job to progress your application, maintain employment records and ensure that we comply with our duties under the employment law) and so that we comply with our legal obligations (i.e. to verify that you have the right to work in the UK or Conduct Regulations).

7.15 You do not have to provide this information, but we will not be able to process your application successfully if you fail to provide information which is necessary for us to consider your application (such as Identity data, or relevant Background data, i.e. evidence of qualifications or work history). We may also not be able to contact you if you do not provide us with your Contact Data. If we require references for this role and you fail to provide us with Referee Data, we will not be able to take to process your application further.

7.16 We will share this data with HR Personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of outcome. If we offer you a job, we may also have to share this data with our accountants, legal advisers, consultants and a relevant professional body bodies such as HRMC or Home Office. If you are a contractor, we will share this information with our clients (strictly on the need to know basis).

7.17 In very limited circumstances and depending on the position applied for and the requirements of the client, we may need to collect your criminal record data. If do so we will provide you with relevant information on how your criminal record data will be processed before such collection.

7.18 We will only process sensitive personal information if we have lawful basis for doing so and one of the special conditions for processing sensitive information applies. We will not request you to provide us your personal sensitive data.

7.19 Any sensitive personal data that you provide to us, will be processed for legitimate business interest and to comply with our legal obligations (i.e. Equality Act 2010). We will collect this information so that we can:

7.19.1 maintain employment records;

7.19.2 use information about your (health) disability status to provide appropriate adjustments, for example whether adjustments need to be made during your interview or if we need to use certain methods to communicate with you to progress your application or we need to make reasonable adjustments during your employment and so that we do not discriminate against you.



- 7.19.3 use information about your race or national or ethnic origin, religious beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- 7.20 We will obtain sensitive personal information from you. We may also receive this information from your referees, details of which you have provided or any medical practitioners that you authorise to disclose this data to us.
- 7.21 You do not have to provide this information and it will not affect your application if you do not provide it.



- 7.22 We will share sensitive personal data in relation to your health with HR Personnel on a strictly need to know basis (i.e. to contact you to progress your application, arrange interviews and inform you of the outcome e.g. if you request for us to contact you only in writing or to make specific arrangements for your interview or to ensure that we meet our obligations under the Equality Act). We may also share this information with any prospective clients that we can place you with if you are a contractor and only if we have your express permission/request to do so.
- 7.23 The Company will not carry out automated decision-making (including profiling) based on any individual's sensitive personal information.

## 8 Data Retention

- 8.1 We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data.
- 8.2 We generally keep your personal data so that we can:
  - 8.2.1 respond to any questions, complaints or claims made by you or on your behalf;
  - 8.2.2 show that we treated you fairly;
  - 8.2.3 keep records required by law;
  - 8.2.4 prevent fraud;
  - 8.2.5 comply with our regulatory requirements.
- 8.3 When it is no longer necessary to retain your personal data, we will delete securely.
- 8.4 In summary your data will be retained as follows:

**Website Users:** data will be anonymised and retained for maximum of 6 years.

- 8.4.1 **Clients:** enquiries will be retained for 12 months. After 6 months your data will be made accessible only under limited circumstances, i.e. to comply with our regulatory obligations. Completed orders will be retained for the duration of 6 years i.e. to defend any legal claims.
- 8.4.2 **Promotional:** If you subscribed to receive our promotional notifications, we will retain your name, organisation and your contacting preferences until you withdraw your consent.
- 8.4.3 **Candidates and Staff Members:** if you apply for a job but your application has not been successful for the duration of 6 months unless you have consented to your data to be retained for speculative applications. In this case your data will be retained indefinitely on the basis of your consent. If you have



applied for a job and you were successful we will retain your data for 6 years from the date of the termination of your employment with us or with our client.

## **9 Data Security**

- 9.1 Information may be held at our offices and third-party agencies, service providers, representatives and agents. We have security measures in place to ensure that there is appropriate security for information we hold.
- 9.2 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from our data protection manager.



- 9.3 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **10 Data Sharing**

- 10.1 We routinely share personal data with:
- 10.1.1 relevant personnel within our Company;
  - 10.1.2 our clients;
  - 10.1.3 our regulators;
  - 10.1.4 our insurers;
  - 10.1.5 external service suppliers, representatives and agents that we use to make our business more efficient (i.e. website developers, document storage service, our technology, system and software providers);
- 10.2 We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.
- 10.3 They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions. We also impose contractual obligations on service providers relating to ensure they can only use your personal data to provide services to us and to you.
- 10.4 We do not send your personal data outside the European Economic Area. If this changes you will be notified of this and the protections, which are in place to protect the security of your data, will be explained.
- 10.5 We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.
- 10.6 We may disclose your data in order to enforce our contractual rights against you or to defend legal claims. We may also disclose your data to protect our rights, property and safety, or the rights, property and safety of others or to prevent fraud.
- 10.7 We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.
- 10.8 We will not share your personal data with any other third party unless you instruct us to.

## 11 Promotional communications

- 11.1 We may use your personal data to send you updates (by email, telephone or post) about job offers, or any promotions that might be of interest to you and/or information about our services, including exclusive offers, promotions, invitations to events or information on our new services.
- 11.2 We have a legitimate interest in processing your personal data for promotional purposes.
- 11.3 We will always treat your personal data with the utmost respect and never sell or share it with other organisations for marketing purposes.
- 11.4 You have the right to opt out of receiving promotional communications at any time by using the 'unsubscribe' link or 'opt out' link in any promotional emails or updating your marketing preferences by contacting us.



- 11.5 We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

## 12 Your Rights

- 12.1 Under the legislation you may be entitled to the listed rights in certain circumstances as listed below:
  - 12.1.1 **The right to be informed** about the collection and use of your personal data.
  - 12.1.2 **The right to access (Subject Access Request)** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. If you wish to exercise this right you will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
  - 12.1.3 **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. In certain circumstances we may refuse a request for correction.
  - 12.1.4 **Request erasure** of your personal information. In certain circumstances you have the right to have ask for some but not all of the information we hold and process to be erased (the right to be forgotten). 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).
  - 12.1.5 **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 particular 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.
  - 12.1.6 **Request 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.
  - 12.1.7 **Request the transfer** of your personal information to another party.

12.1.8 **Rights in relation to automated decision making and profiling.** You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

12.2 If you want to exercise any of the above-mentioned rights, please contact us by telephone or in writing. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated

12.3 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### 13 Cookies



13.1 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.