



City of York Trading Ltd Privacy Policy

Company Name:	City of York Trading Ltd t/a WorkwithYork, WorkwithSchools and WorkwithYorkshire('the Company')
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All organisations that process personal data are required to comply with data protection legislation. This includes in particular the Data Protection Act 1998 (or its successor) and the EU General Data Protection Regulation (GDPR) together known as the 'Data Protection Laws'. The Data Protection Laws give individuals (known as data subjects) certain rights over their personal data whilst imposing certain obligations on the organisations that process their data.

As a recruitment business the Company collects and processes both personal data and sensitive personal data. It is required to do so to for its business and to comply with other legislation. It is also required to keep this data for different periods depending on the nature of the data.

This policy explains what the Company does with personal data of the Company's Candidates, Clients, Suppliers, the Company's Website Users, and Other People whom it may contact in order to find out more about its Candidates or whom its Candidates indicate are an emergency contact. It also applies to the emergency contacts of the Company's permanent Staff.

It describes how the Company collects, uses and processes personal data, and in doing so, how it complies with its legal obligations. The privacy of individuals is important to the Company, and it is committed to protecting and safeguarding data privacy rights.

Summary sections are shown at pages 2-9, with links to more detailed information which can be found at pages 10 - 43



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SUMMARY SECTIONS (P2-9)

WHAT KIND OF PERSONAL DATA DOES THE COMPANY COLLECT?

CANDIDATE DATA:

To provide you with the best possible employment opportunities, tailored to you, the Company needs to process certain information about you. The Company only ask for details that will genuinely help it to help you, such as your name, age, contact details, education details, employment history, emergency contacts, immigration status, and national insurance number (and of course you may choose to share other relevant information with it). Where appropriate and in accordance with laws and/or job requirements, the Company may also collect information related to your health, diversity information or details of any criminal convictions.

If you would like more details of the personal data that the Company collects about you, please click [here](#).

If you access the Company's websites it will also collect certain data from you. If you would like more information about this, please click [here](#).

CLIENT DATA:

If you are customer of the Company, it needs to collect and use information about you, or individuals at your organisation, in the course of: (i) finding Candidates who are the right fit for you or your organisation; and/or (ii) authorising timesheets, processing payroll and issuing invoices; and/or (iii) notifying you of content published by the Company which is likely to be relevant and useful to you (for example its client newsletters).

If you would more details of the personal data that the Company collects in this way, please click [here](#).

If you access its websites the Company will also collect certain data from you. If you would like more information about this, please click [here](#).

SUPPLIER DATA:

The Company needs a small amount of information from its Suppliers to ensure that things run smoothly. The Company needs contact details of relevant individuals at your organisation so that it can communicate with you. The Company also needs other information such as your bank details so that it can pay for the services you provide (if this is part of the contractual arrangements between it and you).

If you would like more details of the personal data that the Company collects about you, please click [here](#).

If you access the Company's websites it will also collect certain data from you. If you would like more information about this, please click [here](#)



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PEOPLE WHOSE DATA THE COMPANY RECEIVE FROM CANDIDATES AND PERMANENT STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:

In order to provide Candidates with suitable employment opportunities safely and securely and to provide for every eventuality for them and its permanent staff, the Company needs some basic background information. The Company only asks for basic contact details, so that the Company can get in touch with you either for a reference or because you've been listed as an emergency contact for one of its Candidates or permanent staff members.

If you would like a more detailed description of the personal data that the Company collects about you, please click [here](#).

WEBSITE USERS:

The Company collects a limited amount of data from its Website Users which the Company uses to help it to improve your experience when using its websites and to help it manage the services the Company provides. This includes information such as how you use its websites, the frequency with which you access its Websites, and the times that its websites are most popular.

If you would like to find out more information about what data the Company collects about you when you visit its websites, please click [here](#).

A number of elements of the personal data the Company collects from you are needed so that the Company can carry out its contractual duties to you or to others. Where appropriate, some, such as tax details and national insurance numbers are required by law. Other items may be needed to ensure that relationship can run smoothly.

Depending on the type of personal data in question and the grounds on which the Company may be processing it, if you decline to provide it with such data, the Company may not be able to fulfil its contractual requirements or, in extreme cases, may not be able to continue with its relationship.

For details of the legal bases that the Company rely on to be able to use and process your personal data, please click [here](#).



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HOW DOES THE COMPANY COLLECT YOUR PERSONAL DATA?

CANDIDATE DATA:

There are two main ways in which the Company collects your personal data: 1.

Directly from you; and

2. From third parties.

If you want to know more about how the Company collects your personal data, please click [here](#).

If you access the Company's websites or read or click on an email from it, the Company may also collect certain data automatically or through you providing it to the Company. For more information please click [here](#).

CLIENT DATA:

There are two main ways in which the Company collects your personal data:

1. Directly from you; and

2. From third parties (e.g. the Company's [Candidates](#)) and other limited sources (e.g. online and offline media).

If you would like to know more about how the Company collects your personal data, please click [here](#).

If you access the Company's websites or read or click on an email from it, the Company may also collect certain data automatically or through you providing it to the Company.. For more information please click [here](#).

SUPPLIER DATA:

The Company collects your personal data during the course of its work with you.

If you access the Company's websites or read or click on an email from it, the Company may also collect certain data automatically or through you providing it to the Company.. For more information please click [here](#).

PEOPLE WHOSE DATA THE COMPANY RECEIVE FROM CANDIDATES AND PERMANENT STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:

The Company collects your contact details only where a [Candidate](#) or a member of its [permanent staff](#) puts you down as their emergency contact or where a [Candidate](#) gives them to the Company in order for you to serve as a referee.

WEBSITE USERS:

The Company may collect your data automatically via cookies when you visit the Company's websites, in line with cookie settings in your browser. If you would like to find out more about cookies, including how the Company use them and what choices are available to you, please click [here](#). The Company will also collect data from you when you contact it via its Websites, for example by using the "contact it" or "get in touch" or "forum" functions.



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HOW DOES THE COMPANY USE YOUR PERSONAL DATA?

CANDIDATE DATA:

The main reason for using your personal details is to help you find employment or other work roles that might be suitable for you. The more information the Company have about you, your skills and your ambitions, the more the Company can tailor its service to you. Where appropriate and in accordance with laws and requirements, the Company may also use your personal data for things like marketing and diversity monitoring. Where appropriate, the Company will seek your consent to undertake some of these activities.

For more details on how the Company use your personal data, please click [here](#).

CLIENT DATA:

The main reason for using information about Clients is to ensure that the contractual arrangements between it and you it can be properly implemented so that the relationship can run smoothly. This may involve: (i) identifying Candidates who the Company think will be the right fit for you or your organisation; and/or (ii) ensuring those Candidates are paid; and/or (iii) invoicing you for its services. The more information the Company have, the more the Company can tailor its service to you For more details on how the Company uses your personal data, please click [here](#).

SUPPLIER DATA:

The main reasons for using your personal data are to ensure that the contractual arrangements between it and you can properly be implemented so that the relationship can run smoothly, and to comply with legal requirements.

For more details on how the Company uses your personal data, please click [here](#).

PEOPLE WHOSE DATA THE COMPANY RECEIVE FROM CANDIDATES AND PERMANENT STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:

The Company use referees' personal data to help its Candidates to find employment which is suited to them. If the Company are able to verify their details and qualifications, the Company can make sure that they are well matched with prospective employers. The Company may also use referees' personal data to contact them in relation to recruitment activities that may be of interest to them. The Company uses the personal details of Candidate's or permanent staff member's emergency contacts in the case of an accident or emergency affecting that Candidate or member of permanent staff .

For more details on how the Company use your personal data, please click [here](#).

WEBSITE USERS:

The Company may use your data to help it to improve your experience of using its websites, for example by analysing your recent job search criteria to help to present jobs to you that the Company think you'll be interested in. If you are also a Candidate or Client of the Company, it may use data from your use of its websites to enhance other aspects of its communications with, or service to, you.

If you would like to find out more about cookies, including how the Company uses them and what choices are available to you, please click [here](#).

Please note that communications to and from the Company's permanent staff including emails may be reviewed as part of internal or external investigations or litigation.



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WHO DOES THE COMPANY SHARE YOUR PERSONAL DATA WITH?

CANDIDATE DATA:

The Company may share your personal data with various parties, in various ways and for various reasons. Primarily the Company will share your information with prospective employers to increase your chances of securing the job you want. Unless you specify otherwise, the Company may also share your information with associated third parties such as its service providers where the Company feel this will help it to provide you with the best possible service.

If you would like to see a list of who the Company may share your personal data with, please click [here](#).

CLIENT DATA:

The Company will share your data primarily to ensure that the Company provide you with a suitable pool of Candidates; Unless you specify otherwise, the Company may share your information with its associated third parties such as its service providers to help it meet these aims.

If you would like to see a list of who the Company may share your personal data with, please click [here](#).

SUPPLIER DATA:

Unless you specify otherwise, the Company may share your information with any associated third parties such as its service providers and organisations to whom the Company provide services.

If you would like to see a list of who the Company may share your personal data with, please click [here](#).

PEOPLE WHOSE DATA THE COMPANY RECEIVE FROM CANDIDATES AND PERMANENT STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:

Unless you specify otherwise, the Company may share your information with associated third parties such as its service providers and organisations to whom the Company provide services.

If you would like to see a list of who the Company may share your personal data with, please click [here](#).

WEBSITE USERS:

Unless you specify otherwise, the Company may share your information with providers of the web analytics services, marketing automation platforms and social media services to make sure any advertising you receive is targeted to you.



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HOW DOES THE COMPANY SAFEGUARD YOUR PERSONAL DATA?

The Company care about protecting your information. That's why the Company put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data.

For more information on the procedures the Company put in place, please click [here](#).

HOW LONG DOES THE COMPANY KEEP YOUR PERSONAL DATA FOR?

If the Company have not had meaningful contact with you (or, where appropriate, the company you are working for or with) for a period of two years, the Company will delete your personal data from its systems unless the Company believe in good faith that the law or other regulation requires the Company to preserve it (for example, because of its obligations to tax authorities or in connection with any anticipated litigation).

For more information on the Company's policy for the retention of personal data, please click [here](#).

HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO THE COMPANY?

Even if the Company already hold your personal data, you still have various rights in relation to it. To get in touch about these, please [get in touch](#). The Company will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that the Company may keep a record of your communications to help it to resolve any issues which you raise.

RIGHT TO OBJECT:

If the Company are using your data because the Company deem it necessary for its legitimate interests to do so, and you do not agree, you have the right to object. The Company will respond to your request within 30 days (although the Company may be allowed to extend this period in certain cases). Generally, the Company will only disagree with you if certain limited conditions apply.

RIGHT TO WITHDRAW CONSENT:

Where the Company have obtained your consent to process your personal data for certain activities (for example, for processing sensitive data for certain roles), or consent to market to you, you may withdraw your consent at any time.



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DATA SUBJECT ACCESS REQUESTS (DSAR):

You have the right to ask the Company to confirm what information it holds about you at any time, and you may ask it to modify, update or delete such information. At this point the Company may comply with your request or, additionally do one of the following:

1. the Company may ask you to verify your identity, or ask for more information about your request; and
2. where the Company is legally permitted to do so, the Company may decline your request, but the Company will explain why if it does so.

RIGHT TO ERASURE:

In certain situations (for example, where the Company have processed your data unlawfully), you have the right to request it to "erase" your personal data. The Company will respond to your request within 30 days (although the Company may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If the Company does agree to your request, the Company will delete your data but will generally assume that you would prefer it to keep a note of your name on its register of individuals who would prefer not to be contacted. That way, the Company will minimise the chances of you being contacted in the future where your data is collected in unconnected circumstances. If you would prefer the Company not to do this, you are free to say so.

RIGHT OF DATA PORTABILITY:

You have the right to transfer your data from the Company to another data controller. The Company will help with this by providing you with a copy in a commonly used format.

RIGHT TO RAISE CONCERNS WITH A SUPERVISORY AUTHORITY:

You also have the right to raise concerns with the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority if your data is processed outside of the UK, if you believe that your data protection rights have not been adhered to.

If your interests or requirements change, you can unsubscribe from part or all of its marketing content (for example job role emails or newsletters) by clicking the unsubscribe link in the email, or by emailing it direct letting it know what you want to unsubscribe from.

If you would like to know more about your rights in respect of the personal data the Company hold about you, please click here.



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HOW DOES THE COMPANY STORE AND TRANSFER YOUR DATA INTERNATIONALLY?

In order to operate its business effectively, the Company deals with some Suppliers and Clients who are based outside or operate outside the UK. In order for the Company to continue operating in this way, the Company may have to transfer or store your data internationally.

For more information on the steps the Company takes when it transfers and stores your data internationally, please click [here](#).

WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA ON THE COMPANY'S WEBSITES?

The Company controls the processing of personal data on its websites along with Suppliers such as website authors, hosts and third parties who the Company may ask to work to improve or add content to its websites. For further details, please click [here](#).

WHAT ARE COOKIES AND HOW DO THE COMPANY USE THEM?

A "cookie" is a bite-sized piece of data that is stored on your computer's hard drive. They are used by nearly all websites and do not harm your system. The Company use them to track your activity to help ensure you get the smoothest possible experience when visiting its websites. The Company can use the information from cookies to ensure it presents you with options tailored to your preferences on your next visit. The Company can also use cookies to analyse traffic and for advertising purposes.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. If you want to find out more about cookies, including how the Company use them and what choices are available, please click [here](#).

HOW TO REJECT COOKIES

If you don't want to receive cookies that are not strictly necessary to perform basic features of the Company's websites, you may choose to opt-out by changing your browser settings.

Most web browsers will accept cookies but if you would rather the Company didn't collect data in this way you can choose to accept all or some, or reject cookies in your browser's privacy settings. However, rejecting all cookies means that you may not be able to take full advantage of all features on the Company's websites. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences. For more information generally on cookies, including how to disable them, please click [here](#) or refer to <http://www.aboutcookies.org.uk/> You will also find details on how to delete cookies from your computer.



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DETAILED SECTIONS (P10 – 43)

WHAT KIND OF PERSONAL INFORMATION DOES THE COMPANY COLLECT?

This is a more detailed look at the information the Company may collect about you. The information described below is, of course, in addition to any personal data the Company are required by law to process in any given situation.

CANDIDATE DATA:

Depending on the relevant circumstances and applicable laws and job requirements, the Company may collect some or all of the information listed below to enable it to offer you employment opportunities which are tailored to your circumstances and your interests:-

- Name;
- Age/date of birth;
- Sex/gender;
- Photograph;
- Marital status;
- Contact details;
- Education details;
- Employment history;
- Emergency contacts details;
- Referee details;
- Immigration status (whether you need a work permit);
- Nationality/citizenship/place of birth;
- A copy of your driving licence and/or passport/identity card/proof of address documents;
- National Insurance number and any other tax-related information;
- Diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information;



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- Details of any criminal convictions if this is required for a role that you are interested in applying for;
- Details about your current remuneration, pensions and benefits arrangements;
- Information on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on the Company's websites;
- Extra information that you choose to tell it;
- Extra information that your referees chooses to tell it about you;
- Extra information that the Company's Clients may tell it about you, or that the Company find from other third party sources such as job sites;
- IP address;
- The dates, times and frequency with which you access the Company's services; and
- CCTV footage if you attend its premises.

Please note that the above list of categories of personal data the Company may collect is not exhaustive.

If you access its websites the Company will also collect certain data from you. If you would like more information about this, please click [here](#).

CLIENT DATA:

The data the Company collects about Clients is generally only your contact details or the details of individual contacts at your organisation (such as their names, telephone numbers and email addresses) to enable it to ensure that the relationship runs smoothly. The Company may also hold information relating to your online engagement with material published by the Company, which the Company use to ensure that its marketing communications to you are relevant and timely. The Company may also hold extra information that someone in your organisation has chosen to tell it. If the Company need any additional personal data for any reason, the Company will let you know.

If you access its websites the Company will also collect certain data from you. If you would like more information about this, please click [here](#).



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SUPPLIER DATA:

With Suppliers the Company simply needs to make sure that the relationship runs smoothly. The Company will collect the details for its contacts within your organisation, such as names, telephone numbers and email addresses. It will also collect bank details, so that the Company can pay you. The Company may also hold extra information that someone in your organisation has chosen to tell it.

If you access its websites the Company will also collect certain data from you. If you would like more information about this, please click [here](#).

PEOPLE WHOSE DATA THE COMPANY RECEIVE FROM CANDIDATES AND PERMANENT STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:

All the Company need from referees is confirmation of what you already know about its Candidate or prospective member of permanent staff, so that they can secure that job they really want. Emergency contact details give it somebody to call on in an emergency. To ask for a reference, the Company will need the referee's contact details (such as name, email address and telephone number). It will also need these details if a Candidate or a member of its permanent staff has put you down as their emergency contact so that the Company can contact you in the event of an accident or an emergency.

WEBSITE USERS:

The Company collects a limited amount of data from its website users which the Company use to help it to improve your experience when using its websites and to help it manage the services the Company provide. This includes information such as how you use the websites, the frequency with which you access the websites, your browser type, the location you view the websites from, the language you choose to view it in and the times that the websites are most popular. If you contact it via the websites, for example by using the "contact us" or "get in touch" or "forum" functions, the Company will collect any information that you provide to it, for example your name and contact details. If you would like to find out more information about what data the Company collects about you when you visit its websites, please click [here](#).

HOW DOES THE COMPANY COLLECT YOUR PERSONAL DATA?

CANDIDATE DATA:

The Company collects Candidate personal data in three main ways:

1. Personal data that you, the Candidate, give to it;
2. Personal data that the Company receive from other sources; and
3. Personal data that the Company collects automatically.

Personal data you give to it:

The Company needs to know certain information about you in order to provide a tailored service. This will enable it to provide you with the best opportunities, and should save you time in not having to search through information about jobs and services that are not relevant to you.

There are several ways you can share your information with it, depending on your preference. These may include



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- Entering your personal details on the its websites or via an application form, as part of the registration process;
- Leaving a hard copy CV at a recruitment event, job fair or office;
- Emailing your CV to a Company consultant or being interviewed by them;
- Applying through a jobs aggregator or jobs board, which then redirects you to the Company's website or emails your application to the Company;
- Entering a competition through a social media channel such as Facebook or Twitter.

Personal data the Company receives from other sources:

The Company also receives personal data about Candidates from other sources. Depending on the relevant circumstances and applicable laws and requirements, these may include personal data received in the following situations:

- Your referees may disclose personal information about you;
- The Company's Clients may share personal information about you with it;
- The Company may obtain information about you from searching for potential Candidates from third party sources, such as LinkedIn and other job sites;
- If you 'like' its page on Facebook or 'follow' it on Twitter the Company will receive your personal information from those sites; and
- If you are referred to it through a second tier supplier or via a "recommend a friend" link or initiative, they may share personal information about you with it.

Personal data the Company collects automatically

If you access the Company's websites or read or click on an email from it, where appropriate and in accordance with laws and requirements, the Company may also collect your data automatically or through you providing it to the Company. For more information please click [here](#).



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CLIENT DATA:

The Company collects Client personal data in three ways:

1. Personal data that the Company receive directly from you; 2. Personal data that the Company receive from other sources; and
3. Personal data that the Company collects automatically.

Personal data that the Company receive directly from you

The Company and you both share the same aim – to make sure that you have the best staff for your organisation. The Company will receive data directly from you in two ways:

- Where you contact it proactively, usually by phone or email; and/or
- Where the Company contacts you, either by phone or email, or through its consultants' business development activities more generally.

Personal data the Company receive from other sources

Where appropriate and in accordance with laws and requirements, the Company may seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence including:

- From third party market research and by analysing online and offline media (which the Company may do itself, or employ other organisations to do for it);
- From delegate lists at relevant events; and
- From other limited sources and third parties (for example from its Candidates to the extent that they provide it with your details to act as a referee for them).

Personal data the Company collects via its the Websites

If you access the Company's websites or read or click on an email from it, where appropriate and in accordance with laws and requirements, the Company may also collect your data automatically or through you providing it to it. For more information please click [here](#).

WEBSITE USERS:

When you visit its websites there is certain information that the Company may automatically collect, whether or not you decide to use its services. This includes your IP address, the date and the times and frequency with which you access the websites and the way you browse its content. The Company will also collect data from you when you contact it via its websites, for example by using the "contact us" or "get in touch" or "forum" functions.

The Company collects your data automatically via cookies, in line with cookie settings in your browser. If you are also a Candidate or Client of the Company, the Company may use data from your use of its websites to enhance other aspects of its communications with or service to you. If you would like to find out more about cookies, including how the Company use them and what choices are available to you, please click [here](#).



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HOW DOES THE COMPANY USE YOUR PERSONAL DATA?

Having obtained data about you, the Company then uses it in a number of ways.

CANDIDATE DATA:

The Company generally use Candidate data in four ways:

1. Recruitment Activities;

Its main area of work is recruitment – connecting the right Candidates with the right jobs. The Company have listed below various ways in which it may use and process your personal data for this purpose, where appropriate and in accordance with laws and requirements. Please note that this list is not exhaustive.

- Collecting your data from you and other sources, such as LinkedIn;
- Storing your details (and updating them when necessary) on its database, so that the Company can contact you in relation to recruitment;
- Providing you with its recruitment services and to facilitate the recruitment process;
- Assessing data about you against vacancies which the Company think may be suitable for you;
- Sending your information to Clients, in order to apply for jobs or to assess your eligibility for jobs;
- Enabling you to submit your CV, apply online for jobs or in future to subscribe to alerts about jobs the Company think may be of interest to you;
- Allowing you to participate in online training or assessment;
- Allowing you to participate in the interactive features of its services, such as online forums, when you choose to do so;
- Carrying out its obligations arising from any contracts entered into between the Company and you;
- Carrying out its obligations arising from any contracts entered into between the Company and third parties in relation to your recruitment;
- Facilitating the Company's payroll and invoicing processes;



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- Carrying out customer satisfaction surveys;
- Verifying details you have provided, using third party resources (such as evaluations or skills tests), or to request information (such as references, qualifications, health assessments and potentially any criminal convictions, to the extent that this is appropriate and in accordance with laws and with job requirements);
- Complying with its legal obligations in connection with the detection of crime or the collection of taxes, duties or fines;
- Processing your data to enable it to send you targeted, relevant marketing materials or other communications which the Company think are likely to be of interest to you.

The Company may use your personal data for the above purposes if the Company deem it necessary to do so for its legitimate interests. If you want to know more about what this means, please click [here](#). If you are not happy about this, in certain circumstances you have the right to object and can find out more about how and when to do this [here](#).

2. Marketing Activities;

The Company may periodically send you information that the Company think you may find interesting, or to ask for your help with connecting other [Candidates](#) with jobs. In particular, the Company may wish to use your data for the purposes listed below, where appropriate and in accordance with laws and requirements. Please note that this list is not exhaustive. To: enable it to develop and market other products and services;

- market the Company's full range of recruitment services (permanent, temporary, and ad hoc) to you;
- send you details of reports, promotions, offers, networking and [client](#) events, and general information about the industry sectors which the Company think might be of interest to you;
- display promotional excerpts from your details on its websites as a success story (only where the Company have obtained your express consent to do so); and
- provide you with information about certain discounts and offers that you are eligible for by virtue of your relationship with the Company.



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The Company need your consent for some aspects of these activities which are not covered by its legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, the Company will ask for this via an opt-in or soft-opt-in (which the Company will explain further below).

Soft opt-in consent is a specific type of consent which applies where you have previously engaged with it (for example by submitting a job application or CV, or registering a vacancy to be filled), and the Company are marketing other recruitment-related services. Under 'soft opt-in' consent, the Company will take your consent as given unless or until you opt out. For most people, this is beneficial as it allows it to suggest other jobs to you alongside the specific one you applied for, significantly increasing the likelihood of it finding you a new position. For other types of e-marketing, the Company are required to obtain your explicit consent.

If you want to know more about how the Company obtain consent, please click [here](#). If you are not happy about its approach to marketing, you have the right to withdraw your consent at any time and can find out more about how to do so [here](#). Occasionally, even if you have opted out from its marketing communications, it is possible that your details may be recaptured through public sources in an unconnected marketing campaign. The Company will try to make sure this doesn't happen, but if it does, it is sorry. The Company just asks that in those circumstances you opt out again.

3. Equal Opportunities Monitoring;

The Company are committed to ensuring that its recruitment processes ensure equal opportunities. Some of the data the Company may (in appropriate circumstances where legally appropriate or required) collect about you comes under the umbrella of "diversity information", such as information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background. Where appropriate and where legally appropriate or required, the Company will use this information on an anonymised basis to monitor its compliance with its equal opportunities policy. The Company may also disclose this (suitably anonymised where relevant) data to Clients where this is contractually required or the Client specifically requests such information to enable them to comply with their own employment processes.

This information is what is called 'sensitive' personal information and slightly stricter data protection rules apply to it. The Company therefore need to obtain your explicit consent before the Company can use it. The company will ask for your consent by offering you an opt-in. This means that you have to explicitly and clearly tell it that you agree to the Company collecting and using this information.

The Company may also collect other sensitive personal data about you, such as health-related information, or details of any criminal convictions if this is legally appropriate and is required for a role that you are interested in applying for. The Company will never do this without your explicit consent.

If you would like to find out more about consent, please click [here](#). If you are not happy about this, you have the right to withdraw your consent at any time and you can find out how to do so [here](#).



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4. To help it to establish, exercise or defend legal claims.

In more unusual circumstances, the Company may use your personal data to help it to establish, exercise or defend legal claims.

CLIENT DATA:

The Company use Client information for:

1. Recruitment Activities

Its main area of work is recruitment, through providing you with Candidates.

The Company have listed below the various ways in which the Company use your data in order to facilitate this:-

- Storing your details (and updating them when necessary) on its database, so that the Company can contact you in relation to recruitment activities;
- Keeping records of its conversations and meetings, so that the Company can provide targeted services to you;
- Undertaking customer satisfaction surveys; and
- Processing your data for the purpose of targeting appropriate marketing campaigns.

The Company may use your personal data for these purposes if the Company deem this to be necessary for its legitimate interests. If you would like to know more about what this means, please click here.

If you are not happy about this, in certain circumstances you have the right to object and can find out more about how and when to do this here.

2. Marketing Activities

Subject to appropriate laws and requirements, the Company will not, as a matter of course, seek your consent when sending marketing materials such as its client newsletter to a corporate postal or email address.

If you are not happy about this, you have the right to opt out of receiving marketing materials from it and can find out more about how to do so here.

3. To help it to establish, exercise or defend legal claims

In more unusual circumstances, the Company may use your personal data to help it to establish, exercise or defend legal claims.



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SUPPLIER DATA:

The Company will use your information:

- To store (and update when necessary) your details on its database, so that the Company can contact you in relation to its agreements;
- To offer services to you or to obtain support and services from you;
- To perform certain legal obligations;
- To help it to target appropriate marketing campaigns; and
- In more unusual circumstances, to help it to establish, exercise or defend legal claims.

The Company may use your personal data for these purposes if the Company deem this to be necessary for its legitimate interests. If you want to know more about what this means, please click [here](#).

The Company will not, as a matter of course, seek your consent when sending marketing messages to a corporate postal or email address.

If you are not happy about this, in certain circumstances you have the right to object and can find out more about how to do so [here](#).

PEOPLE WHOSE DATA THE COMPANY RECEIVE FROM CANDIDATES AND PERMANENT STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:

The Company will only use the information that its [Candidate](#) gives it about you for the following purposes:

- If its [Candidates](#) or [permanent staff](#) members put you down on its form as an emergency contact, the Company will contact you in the case of an accident or emergency affecting them; or
- If you were put down by its [Candidate](#) or a prospective member of [permanent staff](#) as a referee, the Company will contact you in order to take up a reference. This is an essential part of its quality [Candidate](#) recruitment process, may be the difference between the individual being accepted for work or not.
- If you were put down by its [Candidate](#) or a prospective member of [permanent staff](#) as a referee, the Company may sometimes use your details to contact you in relation to recruitment activities that the Company think may be of interest to you, in which case the Company will use your data for the same purposes for which the Company use the data of [Clients](#). If you would like to find out more about what this means, please click [here](#).



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The Company may use your personal data for these purposes if the Company deem this to be necessary for its legitimate interests. If you would like to find out more about what this means, please click [here](#).

If you are not happy about this, you have the right to object and can find out more about how to do so [here](#).

WEBSITE USERS:

The Company uses your data to help it to improve your experience of using its the websites, for example by analysing your recent job search criteria to help it to present jobs or [Candidates](#) to you that the Company think you'll be interested in.

If you would like to find out more about cookies, including how the Company use them and what choices are available to you, please click [here](#).

WHO DOES THE COMPANY SHARE YOUR PERSONAL DATA WITH?

Where appropriate and in accordance with laws and requirements, the Company may share your personal data, in various ways and for various reasons, with the following categories of people:

- Individuals and organisations who hold information related to your reference or application to work with it, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies;
- Tax, audit, pension or other authorities, when the Company believes in good faith that the law or other regulation requires it to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);
- Third party service providers who perform functions on its behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, including providers of technical and financial support functions and systems and IT consultants carrying out testing and development work on its business technology systems);
- Third party outsourced IT and document storage providers where the Company have an appropriate processing agreement (or similar protections) in place;
- Marketing technology platforms and [Suppliers](#);
- In the case of [Candidates](#): potential employers and potentially other recruitment agencies/organisations to increase your chances of finding employment;
- In the case of [Candidates](#): third party partners, job boards and job aggregators where the Company consider this will improve the chances of finding you the right job;



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- In the case of Candidates and its Candidates' and prospective members of permanent staff's referees: third parties who the Company have retained to provide services such as reference, qualification, health and criminal convictions checks, to the extent that these checks are appropriate and in accordance with law;
- If the Company merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) the Company may share your personal data with the (prospective) new owners of the business or company.

HOW DOES THE COMPANY SAFEGUARD YOUR PERSONAL DATA?

The Company is committed to taking all reasonable and appropriate steps to protect the personal information that it holds from misuse, loss, or unauthorised access. The Company does this by having in place a range of appropriate technical and organisational measures, including but not limited to:-

- Restricting access to its business technology systems and databases which contain personal data to authorised permanent staff, suppliers and third party service providers and that, where appropriate, access is password protected (cyber security);
- Ensuring that hard copy documents containing personal data are stored in locked draws, cabinets and/or filing rooms and that access is restricted to authorised permanent staff;
- Ensuring that documents containing personal data are not kept any longer than necessary (data minimisation);
- Ensuring data is anonymised where it is feasible to do so (e.g. equal opportunities monitoring)
- Having internal policies and procedures are in place to ensure its permanent staff comply with GDPR requirements;

The Company also have measures in place to deal with any suspected data breach. If you suspect any misuse or loss of or unauthorised access to your personal information please let it know immediately. Details of how to contact it can also be found here.

HOW LONG DOES THE COMPANY KEEP YOUR PERSONAL DATA FOR?

The Company will delete your personal data from its systems if the Company have not had any meaningful contact with you (or, where appropriate, the company you are working for or with) for two years (or for such longer period as the Company believes in good faith that the law or relevant regulators require it to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

For those Candidates whose services are provided via a third party company or other entity, "meaningful contact" with you means meaningful contact with the company or entity which supplies your services. Where the Company are notified by such company or entity that it no longer has that relationship with you, the Company will retain your data for no longer than two years from that point or, if later, for the period of two years from the point the Company subsequently have meaningful contact directly with you.



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When the Company refer to "meaningful contact", the Company means, for example, communication between it and you (either verbal or written), or where you are actively engaging with its online services. If you are a Candidate the Company will consider there to be meaningful contact with you if you submit your updated CV onto its websites or take part in its online forum. The Company will also consider it meaningful contact if you communicate with it about potential roles, either by verbal or written communication or click through from any of its marketing communications. Your receipt, opening or reading of an email or other digital message from it will not count as meaningful contact – this will only occur in cases where you click-through or reply directly.

HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO THE COMPANY?

One of the GDPR's main objectives is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy. This means that you retain various rights in respect of your data, even once you have given it to it. These are described in more detail below.

To get in touch about these rights, please get in touch. The Company will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which the Company are lawfully entitled). Please note that the Company may keep a record of your communications to help it resolve any issues which you raise.

Right to object:

This right enables you to object to the Company processing your personal data where it does so for one of the following four reasons:

- (i) its legitimate interests;
- (ii) to enable it to perform a task in the public interest or exercise official authority;
- (iii) to send you direct marketing materials; and
- (iv) for scientific, historical, research, or statistical purposes.

The "legitimate interests" and "direct marketing" categories above are the ones most likely to apply to its Website Users, Candidates, Clients and Suppliers. If your objection relates to it processing your personal data because the Company deem it necessary for its legitimate interests, the Company must act on your objection by ceasing the activity in question unless:

- the Company can show that the Company have compelling legitimate grounds for processing which overrides your interests; or
- the Company are processing your data for the establishment, exercise or defence of a legal claim.

If your objection relates to direct marketing, the Company must act on your objection by ceasing this activity.



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Right to withdraw consent:

Where the Company have obtained your consent to process your personal data for certain activities (for example, for its marketing arrangements or processing sensitive data for job matching), you may withdraw this consent at any time and the Company will cease to carry out the particular activity that you previously consented to unless the Company consider that there is an alternative reason to justify its continued processing of your data for this purpose in which case the Company will inform you of this condition.

Data Subject Access Requests (DSAR):

You may ask the Company to confirm what information it holds about you at any time, and request it to modify, update or delete such information. The Company may ask you to verify your identity and for more information about your request. If the Company provides you with access to the information the Company holds about you, it will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from it, the Company may charge you a reasonable administrative cost where legally permissible. Where the Company are legally permitted to do so, the Company may refuse your request. If the Company refuse your request it will always tell you the reasons for doing so.

Right to erasure:

You have the right to request that the Company erase your personal data in certain circumstances. Normally, the information must meet one of the following criteria:

- the data is no longer necessary for the purpose for which the Company originally collected and/or processed it;
- where previously given, you have withdrawn your consent to it processing your data, and there is no other valid reason for it to continue processing;
- the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
- it is necessary for the data to be erased in order for it to comply with its legal obligations as a data controller; or
- if the Company process the data because the Company believe it necessary to do so for its legitimate interests, you object to the processing and the Company are unable to demonstrate overriding legitimate grounds for its continued processing.

The Company would only be entitled to refuse to comply with your request for one of the following reasons:

- to exercise the right of freedom of expression and information;
- to comply with legal obligations or for the performance of a public interest task or exercise of official authority;



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- for public health reasons in the public interest;
- for archival, research or statistical purposes; or
- to exercise or defend a legal claim.

When complying with a valid request for the erasure of data the Company will take all reasonably practicable steps to delete the relevant data.

Right to restrict processing:

You have the right to request that the Company restricts its processing of your personal data in certain circumstances. This means that the Company can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.

The circumstances in which you are entitled to request that the Company restrict the processing of your personal data are:

- where you dispute the accuracy of the personal data that the Company are processing about you. In this case, its processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
- where you object to its processing of your personal data for its legitimate interests. Here, you can request that the data be restricted while the Company verify its grounds for processing your personal data;
- where its processing of your data is unlawful, but you would prefer it to restrict its processing of it rather than erasing it; and
- where the Company has no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.

If the Company have shared your personal data with third parties, the Company will notify them about the restricted processing unless this is impossible or involves disproportionate effort. The Company will, of course, notify you before lifting any restriction on processing your personal data.



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Right to rectification:

You also have the right to request that the Company rectifies any inaccurate or incomplete personal data that the Company holds about you. If the Company has shared this personal data with third parties, the Company will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, the Company will also tell you which third parties the Company has disclosed the inaccurate or incomplete personal data to. Where the Company think that it is reasonable for it not to comply with your request, the Company will explain its reasons for this decision.

Right of data portability:

If you wish, you have the right to transfer your personal data between data controllers. To allow you to do so, the Company will provide you with your data in a commonly used format so that you can transfer the data. This right of data portability applies to: (i) personal data that the Company process automatically; (ii) personal data provided by you; and (iii) personal data that the Company process based on your consent or in order to fulfil a contract.

Right to lodge a complaint with a supervisory authority:

You also have the right to lodge a complaint with the Information Commissioners Office 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is the legal basis for processing your personal data), details of how to contact the Company can be found [here](#). Please note that the Company may keep a record of your communications to help it resolve any issues which you raise.

You may ask to unsubscribe from job alerts and emails at any time. Details of how to do so can be found [here](#).

It is important that the personal information the Company hold about you is accurate and current. Please [keep it informed if your personal information changes](#) during the period for which the Company hold your data.



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WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA ON THE COMPANY'S WEBSITES?

The Company is responsible for processing your personal data on all its websites and it is located at 5/6 Kings Court, The Shambles, York, YO1 7LD, in doing this the Company may work with Suppliers such as its website authors, hosts and third parties who the Company may ask to work to improve or add content to its websites. If you have any further questions and want to contact it please click [here](#).

If you have any comments or suggestions concerning this Policy please follow this [link](#). The Company take privacy seriously so will get back to you as soon as possible.

HOW DOES THE COMPANY STORE AND TRANSFER YOUR DATA INTERNATIONALLY?

In order to provide you with the best service and to carry out the purposes described in this Policy, your data may be transferred:

- to third parties (such as advisers or other Suppliers to the Company);
- to overseas Clients;
- to Clients within your country who may, in turn, transfer your data internationally;
- to cloud-based storage providers; and
- to other third parties, as referred to here.

The Company wants to make sure that your data is stored and transferred in a way which is secure. The Company will therefore only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:

- transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
- by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws; or
- by signing up to the EU-U.S. Privacy Shield Framework for the transfer of personal data from entities in the EU to entities in the United States of America or any equivalent agreement in respect of other jurisdictions; or
- where it is necessary for the conclusion or performance of a contract between the Company and a third party and the transfer is in your interests for the purposes of that contract (for example, if the Company need to transfer data outside the EEA in order to meet its obligations under that contract if you are a Client of the Company); or



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- where you have consented to the data transfer.

To ensure that your personal information receives an adequate level of protection, the Company have put in place appropriate procedures with the third parties the Company share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the law on data protection.

COOKIES POLICY

WHAT'S A COOKIE?

A "cookie" is a piece of information that is stored on your computer's hard drive and which records your navigation of the Company's websites so that, when you revisit that the website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.

Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

THESE COOKIES ARE USUALLY SET IN ONE OF TWO WAYS:

First party cookie:

Set directly by the Company's website you are visiting and the information is only used by that website.

Third party cookie:

Set by a different Company/organisation to the one whose website you are currently using and the data may be shared.

COOKIES ARE EITHER:

Session cookies:

These are only stored on your computer on a temporary basis during your web session and are generally deleted when you close your browser. They are used primarily to help you complete tasks online, for instance remembering your details during form submissions to save you re-entering; or remembering search terms you have recently used.

Persistent cookies:

Stored as a file on your computer for a fixed period of time so remaining there when you close your web browser. The cookie can be read by the website that created it when you visit that website again so that it knows you have previously visited and also any preferences you indicated at the time. The Company uses persistent cookies for Google Analytics and in particular to collect visitor statistics.



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HOW DOES THE COMPANY USE COOKIES?

In common with most current websites the Company uses a blend of the above to help improve your experience of using its websites expressly by using cookies to:

- Track your use of its websites. This enables it to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps it know how many people have visited its websites, the search terms used, and the journeys made to access content – from this the Company can develop and improve its websites and services in response to what its visitors want and need; and
- Help it remember preferences you have previously indicated to it, making it easier for you to fill in forms (particularly if they are several pages long) and capturing your user feedback to ensure the Company only ask you each question once; and
- Make sure the Company know when you are logged in, and logging you out automatically after a period of time to protect you against misuse.

COOKIES CAN ALSO BE CATEGORISED AS FOLLOWS:

Strictly necessary cookies:

These cookies are essential to enable you to use the core features of its websites effectively, such as when applying for a job, and therefore cannot be turned off. Without these cookies, the services available to you on its websites cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

Performance cookies:

These cookies enable it to monitor and improve the performance of its the websites. For example, they allow it to count visits, identify traffic sources and see which parts of the site are most popular, they are anonymised when aggregated and the Company use them to help improve the performance of its websites.

Functionality cookies:

These cookies allow its websites to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, the Company may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised and is not used to track your activities on other websites.

Tracking/Personalisation cookies:

Used to deliver more relevant advertising. Usually placed by third party agencies and the information gathered may be shared with other organisations.



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SPECIFIC COOKIE USAGE ON THE COMPANY'S WEBSITES For details of specific cookies on the Company's websites:-

www.workwithyork.co.uk; and www.workwithschools.co.uk and www.workwithyorkshire.co.uk and www.cytlimited.co.uk; please [click here](#)

COOKIES AND THE LAW

The 'e-Privacy Directive' 2011, gave users of the Websites and other digital media more control over the information that was collected about them. In essence they want to make users more aware of cookies and ensure that their consent is sought before potentially private information is stored. The [GDPR](#) adds some more detail to this, so that single cookies or the combination of several cookies or the combination of cookies with other information may be defined as personal data. The [Information Commission's Office](#) is responsible for enforcement in the UK and more information can be found on their website.

REFUSING COOKIES

You can choose to accept all or some, or reject cookies. If you don't want to receive cookies that are not strictly necessary to perform basic features of the Company's websites, you may choose to optout by changing your browser settings.

Each browser is different – Find out how to manage cookies on popular browsers:

- [Google Chrome](#)
- [Microsoft Edge](#)
- [Mozilla Firefox](#)
- [Microsoft Internet Explorer](#)
- [Opera](#)
- [Apple Safari](#)

To find information relating to other browsers, visit the browser developer's website.

However, please be aware that because certain web functions rely on cookies this may affect your use of the Company's websites. Expressly:

- Signing-up and logging-in to areas with account/subscription facilities
- Completing multi-page form submissions
- Saving previously indicated preferences

For more information generally on cookies, including how to disable them, please refer to <http://www.aboutcookies.org.uk/> or www.allaboutcookies.org. You will also find details on how to delete cookies from your computer. To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.



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THE COMPANY'S LEGAL BASES FOR PROCESSING YOUR DATA

LEGITIMATE INTERESTS

Article 6(1)(f) of the GDPR says that the Company can process your data where it "is necessary for the purposes of the legitimate interests pursued by [it] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

The Company thinks that the following activities help it to offer you a more tailored, efficient service, and the Company don't believe they prejudice your interests. However, you do have the right to object to it processing your personal data on this basis. If you would like to know more about how to do so, please click [here](#).

CANDIDATE DATA:

The Company thinks it's reasonable to expect that if you are looking for employment or have posted your professional CV information on a job board or professional networking site, you are happy for it to collect and otherwise use your personal data to offer or provide its recruitment services to you, share that information with prospective employers and assess your skills against its bank of vacancies. Once it's looking like you may get the job, your prospective employer may also want to double check any information you've given it (such as the results from evaluations or skills tests) or to confirm your references, qualifications, fitness to work and criminal record, to the extent that this is appropriate and in accordance with relevant law. The Company needs to do these things so that the Company can function as a recruitment business, and to help you and other [Candidates](#) get the jobs you deserve.

The Company wants to provide you with tailored job recommendations and relevant articles to read to help you on your job hunt. The Company therefore think it's reasonable for it to process your data to make sure that the Company send you the most appropriate content.

The Company also thinks that it might help with your job search if you take part in some of its more interactive services, such as its online forums. These are part of its service offering as a business, and help differentiate it in a competitive marketplace, so it is in its legitimate interests to use your data for this reason.

The Company has to make sure its business runs smoothly, so that the Company can carry on providing services to [Candidates](#) like you. The Company therefore also needs to use your data for its internal administrative activities, like payroll and invoicing where relevant.

The Company has its own obligations under the law, which it is a legitimate interest of ours to insist on meeting. If the Company believes in good faith that it is necessary, the Company may therefore share your data in connection with crime detection, tax collection or actual or anticipated litigation.

CLIENT DATA:



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To ensure that the Company provides you with the best service possible, the Company stores your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of its conversations, meetings, registered jobs and placements. From time to time, the Company may also ask you to undertake a customer satisfaction survey. The Company thinks this is reasonable – the Company deems these uses of your data to be necessary for its legitimate interests as an organisation providing various recruitment services to you.

SUPPLIER DATA:

The Company uses and stores the personal data of individuals within your organisation in order to facilitate the receipt of services from you as one of its Suppliers. The Company also holds your financial details, so that the Company can pay you for your services. The Company deem all such activities to be necessary within the range of its legitimate interests as a recipient of your services.

PEOPLE WHOSE DATA THE COMPANY RECEIVE FROM CANDIDATES AND PERMANENT STAFF, SUCH AS REFEREES AND EMERGENCY CONTACTS:

If you have been put down by a Candidate or a prospective member of permanent staff as one of their referees, the Company uses your personal data in order to contact you for a reference. This is a part of its recruitment and quality assurance procedure and so the Company deems this to be necessary for its legitimate interests as an organisation offering recruitment services and employing people itself.

If a Candidate or permanent staff member has given it your details as an emergency contact, the Company will use these details to contact you in the case of an accident or emergency. The Company is sure you will agree that this is a vital element of its people-orientated organisation, and so is necessary for its legitimate interests.

CONSENT

In certain circumstances, the Company is required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what the Company are doing with your information, this consent will be opt-in consent or soft opt-in consent.

Article 4(11) of the GDPR states that (opt-in) consent is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her." In plain language, this means that:

- you have to give it your consent freely, without it putting you under any type of pressure;
- you have to know what you are consenting to – so the Company will make sure the Company give you enough information;



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- you should have control over which processing activities you consent to and which you don't; and
- you need to take positive and affirmative action in giving it your consent – the Company are likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

The Company will keep records of the consents that you have given in this way.

The Company have already mentioned that, in some cases, the Company it will be able to rely on soft opt-in consent. The Company are allowed to market products or services to you which are related to the recruitment services the Company provide as long as you do not actively opt-out from these communications.

You have the right to withdraw your consent to these activities. You can do so at any time, and details of how to do so can be found [here](#).

ESTABLISHING, EXERCISING OR DEFENDING LEGAL CLAIMS

Sometimes it may be necessary for the Company to process personal data and, where appropriate and in accordance with laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".

This may arise for example where the Company needs to take legal advice in relation to legal proceedings or is required by law to preserve or disclose certain information as part of the legal process.

CONTRACT

CANDIDATE:

If you are a [Candidate](#) working through the Company on a temporary basis in accordance with its Agency Worker Temporary Terms and Conditions, then the Company has a contract with you which includes an obligation to pay you for the work you have carried out, provided you meet requirements under these terms. To perform its obligations under this contract, the Company therefore needs to store and process your personal data for payroll purposes, which will include sharing your data with the [Clients](#) you are placed with, to obtain timesheet and expense claim authorisation and with tax authorities and pension providers to comply with its legal obligations.

CLIENT:

If the Company is providing recruitment services to you, based on its Client Temporary Terms & Conditions or on its Client Permanent Terms & Conditions, this is a contract with you. The Company



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needs to process and store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of its conversations, meetings, registered jobs and placements in order to carry out its obligations under this contract.

SUPPLIER:

The Company needs to store and process contact details of relevant individuals at your organisation so that it can communicate with you. The Company also needs other information such as your bank details so that it can pay you for the services you provide as part of the contractual arrangements between it and you.

LEGAL OBLIGATION

Where your personal data is processed in accordance with the fair processing condition relating to its rights and obligations under employment and social security law, this relates to its processing of your personal data which is necessary for compliance with legal obligations (such as ensuring that the Company pay you statutory sick pay, comply with the statutory employment protections that you enjoy, comply with health and safety laws, and ensure that appropriate National Insurance contributions are made).



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SCHEDULE 1

HOW TO CONTACT THE COMPANY

To get in touch:

Please write to the following address:

FAO Karen Bull – Managing Director

City of York Trading Ltd t/a WorkwithYork; WorkwithSchools,

5/6 Kings Court,

The Shambles,

York,

YO1 7LD

Please mark your envelope “Data Privacy”

Alternatively, you can send an email to: privacy@cytlimited.co.uk

If you

- want to access, amend or take back the personal data that you have given to the Company;
- suspect any misuse or loss of or unauthorised access to your personal information;
- want to withdraw your consent to the processing of your personal data (where consent is the legal basis on which the Company process your personal data);
- have any comments or suggestions concerning this Policy

To update your marketing preferences

Please write to the following address:

FAO Claire Leaver – Marketing & Communications Manager

City of York Trading Ltd t/a WorkwithYork and WorkwithSchools,

5/6 Kings Court,

The Shambles,

York,

YO1 7LD

Please mark your envelope “Marketing Preferences”



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You can also email at: privacy@cytlimited.co.uk Or you can click the "Update Preferences" link in marketing e-mails the Company sends to you.

SCHEDULE 2

HOW TO CONTACT YOUR LOCAL SUPERVISORY AUTHORITY

Your local supervisory authority is :

The Information Commissioner's Office.

You can contact them in the following ways:

Phone:

0303 123 1113

Email:

casework@ico.org.uk

Post:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

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SCHEDULE 3

COOKIES

Specific Cookies on the Company's websites are set out below:-

Statistics

Statistic cookies help the Company to understand how visitors interact with its websites by collecting and reporting information anonymously.

Cookie Name [+ Duration]	Provider	Cookie Purpose
_ga [2 years] _gat [session] _gid [session] _gali [session]	workwithschools.co.uk workwithyork.co.uk workwithyorkshire.co.uk	<p>The Company uses Google Analytics on its website s. These cookies are used to collect information about how visitors use its website and WordPress blog. It uses the information to compile reports and to help the Company improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited. _gali is used to identify which links on a page are being clicked.</p> <p>Read Google's overview of privacy and safeguarding data</p>

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__utm.gif [session] __utma [2 years] __utmb [session] __utmc [session] __utmt [session] __utmz [6 months]	Sound Cloud	<p>The Company uses embedded Sound Cloud widgets to play audio clips from the Sound Cloud website e.g. a radio interview with one of its staff members. Sound Cloud may set cookies on your computer as you reach the page containing the embedded Sound Cloud widget. For more information about Sound Cloud Cookies read the Sound Cloud Cookie Policy.</p> <p>These cookies relate to Google Analytics used by Sound Cloud.</p>
vuid [2 years] vimeo analytics unique id [2 years] __utma [2 years] __utmt_player [session] __utmb [session] player [1 year] __utmc [session] __utmz [6 months]	vimeo.com	<p>The Company uses video sharing website “Vimeo” to deliver and display videos on its website. When viewing pages where the Vimeo player is embedded Vimeo may set cookies on your device e.g. to collect data about which pages have been viewed. To find about more about how Vimeo uses cookies see Vimeo’s Cookie List. More information can be found on Vimeo’s Privacy Policy.</p>

Marketing

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

Cookie Name [+ Duration]	Provider	Cookie Purpose
ads/user-lists/# [session]	google.com	These cookies are used for generating lists of previous website visitors. They may be used for remarketing campaigns where Adwords adverts are displayed to users on the user list. As previous visitors to the website, those users are considered more likely to be interested in the adverts.

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collect [session]	google-analytics.com	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels.
lang [session]	cdn.syndication.twimg.com	'lang' remembers the user's selected language version of a website.

i/jot/syndication [session]	twitter.com	<p>The Company uses a Twitter timeline widget to display its Twitter feed on its website homepage. When accessing a web page where the widget is placed Twitter may set cookies on your computer. Learn more about the information Twitter receive and how they use it view their privacy policy and cookies use.</p> <p>The Company has implemented the timeline feed using a method that opts the site out of having information from its website used for personalization. Find out more.</p>
IDE [1 year]	doubleclick.net	Used by Google DoubleClick to register and report the web site user's actions after viewing or clicking on one of the advertiser's adverts with the purpose of measuring the efficacy of an advert and to present targeted adverts to the user.
sc_anonymous_id	Sound Cloud	The Company uses embedded Sound Cloud widgets to play audio clips from the Sound Cloud website e.g. a radio interview with one of its staff members. Sound Cloud may set cookies on your computer as you reach the page containing the embedded Sound Cloud widget. For more information about Sound Cloud Cookies read the Sound Cloud Cookie Policy .

PREF [8 months]	youtube.com	Registers a unique ID that is used by Google to keep statistics of how the visitor uses YouTube videos across different websites.
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VISITOR_INFO1_LIVE [179 days]	youtube.com	Tries to estimate the users' bandwidth on pages with integrated YouTube videos.
YSC [session]	youtube.com	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.
impression.php/# [session]	facebook.com	The Company uses a Facebook timeline widget to display its Facebook Timeline on the homepage of our website. When viewing pages with the Facebook timeline embedded Facebook may set cookies on your device. One function of such cookies is to register impressions on pages with the Facebook log in button. For more information about the cookies set by Facebook visit https://www.facebook.com/policies/cookies/ .
r/collect [session]	doubleclick.net	Collects data to measure efficiency of viewed or clicked ads and shows targeted ads.
test_cookie [session]	doubleclick.net	Used to check if the user's browser supports cookies.
UID [2 years] UIDR [2 years]	scorecardresearch.com	3 rd party marketing cookies set via the Sound Cloud widget embed for Sound Cloud's marketing purposes. Collects information of the user and his/her movement, such as timestamp for visits, most recently loaded pages and IP address. The data is used by the marketing research network, Scorecard Research, to analyse traffic patterns and carry out surveys to help their clients better understand the customer's preferences.
put_# [29 days] rpb [29 days] rpx [29 days] khaos [1 year]	rubiconproject.com	3 rd party cookies set via the Sound Cloud widget embed. Registers anonymised user data, such as IP address, geographical location, visited websites, and what ads the user has clicked, with the purpose of optimising ad display based on the user's movement on websites that use the same ad network.
c [session]	rubiconproject.com	Regulates synchronisation of user identification and exchange of user data between various ad services.

City of York Trading Ltd Privacy Policy

tap.php [session]	rubiconproject.com	Used to identify users' device type.
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Unclassified

_gd# [session]	workwithschools.co.uk	Unclassified 1 st party cookie.
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SCHEDULE 4

DEFINITIONS

CANDIDATES

Includes applicants for all roles advertised or promoted by the Company, including permanent, parttime and temporary positions and freelance roles with the Company's Clients; as well as people who have supplied a speculative CV to the Company not in relation to a specific job. Individual contractors, freelance workers and employees of Suppliers or other third parties put forward for roles with the Company will be treated as Candidates for the purposes of this Policy.

CLIENTS

This covers its customers, Clients, and others to whom the Company provides services in the course of its business.

DELETE

While the Company will endeavour to permanently erase your personal data once it reaches the end of its retention period or where the Company receive a valid request from you to do so, some of your data may still exist within its systems, for example if it is waiting to be overwritten. For its purposes, this data has been put beyond use, meaning that, while it still exists on an archive system, this cannot be readily accessed by any of its operational systems, processes or Staff.

GENERAL DATA PROTECTION REGULATION (GDPR)

A European Union statutory instrument which aims to harmonise European data protection laws. It has an effective date of 25 May 2018, and any references to it should be construed accordingly to include any national legislation implementing it.

OTHER PEOPLE WHOM THE COMPANY MAY CONTACT

These may include Candidates' and the Company's permanent staff's emergency contacts and referees. The Company will only contact them in appropriate circumstances.



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PERMANENT STAFF

Includes employees and interns engaged directly in the business of the Company (or who have accepted an offer to be engaged) as well as certain other workers engaged in the business of providing services to the Company (even though they are not classed as employees). To be clear, 'permanent staff' does not include individuals hired by the Company for the purpose of being placed with Clients. These individuals are treated in the same way as the Company's Candidates and are covered by this Privacy Policy. Likewise, independent contractors and consultants performing services for the Company fall within the definition of a 'Supplier' for the purposes of this Policy.

SUPPLIERS

Refers to partnerships and companies (including sole traders), and atypical workers such as independent contractors and freelance workers, who provide services to the Company. In certain circumstances the Company will sub-contract the services it provides to Clients to third party Suppliers who perform services on the Company's behalf. In this context, Suppliers that are individual contractors, freelance workers, or employees of Suppliers will be treated as Candidates for data protection purposes. Please note that in this context, the Company requires Suppliers to communicate the relevant parts of this Privacy Policy (namely the sections directed at Candidates) to their employees.

WEBSITE USERS

Any individual who accesses any of The Company's the Websites.