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1.Introduction

Eldercare 360 Ltd (the 'Company') is a Consultancy which provides workfinding services to its clients and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services. In doing so, the Company acts as a data controller. You may give your personal details to the Company directly, such as on a registration form or via our website, or we may collect them from another source such as a job board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to positions relevant to you we will only use your personal data in accordance with the Privacy Notice. At all times we will comply with current data protection laws.

2. Collection and Use of Personal Data

A. Purpose of Processing and Legal Basis

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with workfinding services. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you, and developing and managing our services and relationship with you and our clients. In some cases, we may be required to use your data for the purpose of investigating, reporting, and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

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- Where we have a legitimate interest.
 - To fulfil a contractual obligation that we have with you.
 - To comply with a legal obligation that we have.
 - Your consent.

B. Legitimate Interest

This is where the Company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data, our legitimate interests are as follows: • Managing our database and keeping work-seeker records up to date. • Providing work-finding services to you and our clients. • Contacting you to seek your consent where we need it. • Giving you information about similar services that you have used from us recently.

C. Statutory and/or Contractual Requirement

The Company has certain legal and contractual requirements to collect personal data. Our clients may also require this personal data, and/or we may need your data to enter into a contract with you. If you do not give us personal data, we need to collect we may not be able to continue to provide work-finding services to you



D. Recipient/s of Data

The Company will process your personal data and/or sensitive personal data with the following recipients: • Clients (whom we may introduce you to). • Former employers whom we may seek references from. • Other Recruitment Consultancies in the supply chain.

3. Information To Be Provided When Data Collected Not From the Data Subject

The Company has collected the following personal data and/or sensitive personal data on you:

- Name, address, mobile telephone number, and email address.
- Date of birth.
- National Insurance Number.
- Nationality.
- Health information including whether you have a disability.
- Criminal conviction(s). The Company sourced your personal data and/or sensitive personal data from:
 - Jobs boards.
 - A former employer.
 - A referee.
 - Software providers who we use to support our services.
 - Cookies.

4. Overseas Transfers

The Company will not transfer the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with workfinding services. The EEA comprises the EU member states plus Norway, Iceland, and Liechtenstein.

5. Data Retention

The Company will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time.

6. Your Rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you.
- The right of access to the personal data the Company processes on you.
- The right to rectification of your personal data.
- The right to erasure of your personal data in certain circumstances.
- The right to restrict processing of your personal data. • The right to data portability in certain circumstances.
- The right to object to the processing of your personal data that was based on a public or legitimate interest.
- The right not to be subjected to automated decision making and profiling.
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data for further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis. There may be circumstances where the Company will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.



If you believe that a company is using your data in a way that is not necessary, you can object to the use of your data or complain to the organisation. You can also contact us using the above details if you want us to restrict the type or amount of data that we process for you, access your personal data or exercise any of the other rights listed above.

7. Cookies

Cookies are ways of saving a small amount of user information. The actual cookie is a small file of letters and numbers placed by a website onto a user's computer/device when they access the website. To find out more about cookies, please refer to the Cookie Policy.

8. Log Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

9. Links to External Websites

The Company's website may contain links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. When you leave our site, we encourage you to read the privacy notices of each and every website that collects personally identifiable information.

10. Sale of the Company

If the Company is sold or integrated with another company your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the Company.

11. Data Security

The Company takes every precaution to protect our users' information. Only staff who need the information to perform a specific job are granted access to your information. The Company uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email and/or the Internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email and/or the Internet.

12. Making a Complaint

If you think your data rights have been breached, you can raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or by telephone on 0303 123 1113.