

# Privacy Policy

## 1. INTRODUCTION

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We also provide the following other services introductions of candidates, consultancy, advice and resourcing. We collect information about you to carry out our core business and ancillary activities.

This privacy notice provides you with details of how Manny & Me LTD (“we”, “our”, “us”, or “the Company”) collect and Process your Personal Data, whether you’re a client, a candidate, a supplier or another third party.

“**Personal Data**” is any information identifying a living, identifiable individual, excluding any anonymous data but including any sensitive Personal Data. Such data can be factual such as a name, email address, date of birth or national insurance number; or an opinion or reference about a person’s actions or behaviour.

“**Processing**” or “**Process**” means any activity involving the use of Personal Data whether that is obtaining, holding, recording or carrying out any operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. It includes the transmission or transferring Personal Data to third parties.

**Manny & Me LTD** is the data controller and we are responsible for your Personal Data, including determining when, why and how to Process Personal Data.

Our email address is [info@mannyandme.com](mailto:info@mannyandme.com).

Our postal address is **94 Leonard Court, Cobden Walk, London, SE15 2BP**

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at [info@mannyandme.com](mailto:info@mannyandme.com).

## 2. BACKGROUND

This policy has been written in accordance with the principles and safeguards set out in the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”) We adhere to the principles relating to the Processing of Personal Data set out in GDPR which require Personal Data to be:

- (a) Processed lawfully, fairly and in a transparent manner (*Lawfulness, Fairness and Transparency*).
- (b) Collected only for specified, explicit and legitimate purposes (*Purpose Limitation*).
- (c) Adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (*Data Minimisation*).
- (d) Accurate and where necessary kept up to date (*Accuracy*).
- (e) Not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (*Storage Limitation*).

(f) Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage (*Security, Integrity and Confidentiality*).

(g) Not transferred to another country without appropriate safeguards being in place (*Transfer Limitation*).

(h) Made available to individuals such as you to allow them to exercise certain rights in relation to their Personal Data (*Data Subject's Rights and Requests*).

### 3. HOW WE USE YOUR PERSONAL DATA

We will only use your Personal Data when legally permitted. The most common uses of your Personal Data are:

- Where we need to perform the contract between us either (i) in accordance with our terms and conditions of business if you are a client; ii) in accordance with our terms of representation if you are a candidate or (iii) in accordance with the relevant terms of supply between us as businesses.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for Processing your Personal Data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing us at [info@mannyandme.com](mailto:info@mannyandme.com)

#### Purposes for Processing your Personal Data

Set out below is a description of the ways we intend to use your Personal Data and the legal grounds on which we will Process such data. We have also explained what our legitimate interests are where relevant.

We may Process your Personal Data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at [info@mannyandme.com](mailto:info@mannyandme.com) if you need details about the specific legal ground we are relying on to Process your Personal Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for Processing
To register you as a new client	(a) Identity (b) Contact (c) Details concerning your family	To find a suitable candidate for your family in accordance with our legal terms and conditions of business.
To register you as a new candidate	(a) Identity (b) Contact	To comply with your legal terms and conditions of representation and use all reasonable endeavours to find you suitable employment / engagement.

<p>To Process your invoice:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests to recover debts owed to us</p>
<p>To manage our relationship with you as a supplier</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests to manage and run our business</p>
<p>To manage our relationship with you, including notifying you about changes to our terms or privacy policy.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests to keep our records updated and to study how clients use our services</p>
<p>To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security and to prevent fraud.</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To use data analytics to improve our website, services, marketing, client relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests to define types of clients for our services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy.</p>

To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to develop our services and grow our business.
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**Information we obtain from other sources.**

In addition, we may obtain information about our candidates from other sources such as job board websites, references, personal recommendations, and referees. Such information shall be held by us for the purpose of complying with our obligations to our clients and candidates. For further details on the sources from which we obtain Personal Data on candidates and the purposes for which we use it, please refer to our Candidate Privacy Policy.

We are working closely with third parties including [Disclosure & Barring Services.] We may receive information about you from them for the purposes of our recruitment services and ancillary support services.

**Marketing communications**

You will receive marketing communications from us if you have:

- (i) requested information from us or registered with us as a candidate or client; or
- (ii) if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
- (iii) in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your Personal Data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by emailing us at [info@mannyandme.com](mailto:info@mannyandme.com) at any time.

Where you opt out of receiving our marketing communications, this will not apply to Personal Data provided to us as a result of us providing you with a service or other transaction.

**4. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your Personal Data with the parties set out below for the purposes set out in the table in paragraph 2 above:

- Clients who are looking for suitable candidates to fulfil a role that they are offering.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of Processing activities in certain circumstances.

- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your Personal Data and to treat it in accordance with the law. We only allow such third parties to Process your Personal Data for specified purposes and in accordance with our instructions.

## 5. INTERNATIONAL TRANSFERS

We do not transfer your Personal Data outside the European Economic Area.

## 6. DATA SECURITY

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only Process your Personal Data on our instructions and they are subject to a duty of confidentiality.

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

## 7. DATA RETENTION

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we Process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we must keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for six years after they cease being clients for tax purposes.

In some circumstances you can ask us to delete your data and it is our responsibility to make sure that any Personal Data we retain is accurate. So, if you would like us to erase your data (to the extent that we are able) or there are any changes to your data which means what we currently hold is inaccurate, please do let us know.

## 8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data. These include the right to:

- Request access to your Personal Data.
- Request correction of your Personal Data.
- Request erasure of your Personal Data.
- Object to Processing of your Personal Data.
- Request restriction of Processing your Personal Data.
- Request transfer of your Personal Data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at [info@mannyandme.com](mailto:info@mannyandme.com).

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

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

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.