



**BranWell Ford**  
Pensions & Legal Recruitment

## Privacy Policy

### BACKGROUND:

BWF Legal and BWF Pensions t/a BranWell Ford Associates Limited (“We” and “Us”) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who interacts with our recruitment services, visits our website [www.bwfgroup.co.uk](http://www.bwfgroup.co.uk) (“Our Site”) and/or Registers with Us. We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations, your rights under data protection principles and the Law.

Please read this Privacy Policy carefully and ensure that you understand it.

### 1.0 Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

<b>“Account”</b>	means an account required to access and/or use certain areas and features of Our Site.
<b>“Candidate”</b>	means an individual who has completed a Registration with Us for the purposes of conducting a recruitment search.
<b>“Cookie”</b>	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in our Cookie Policy.
<b>“Client”</b>	means an employer who has placed a vacancy with Us for the purposes of conducting a recruitment search.
<b>“Registration” and “Register”</b>	means a profile created by Us from your personal data to enable you to access our recruitment services.

### 2.0 Information About Us

- 2.1 Our Site is owned and operated by RecruiterWeb; a limited company registered in England and Wales under company number 9995374.
- 2.2 The registered address and trading address of BranWell Ford Associates Limited is Suite 8 The Chestnuts, 4 Stortford Road, Great Dunmow, Essex, England, CM6 1DA.
- 2.3 BranWell Ford Associates Limited is registered in England and Wales under company number 04498338.
- 2.4 The Data Protection Officer for BranWell Ford Associates Limited is Pip Raffael, Managing Director who can be contacted by email at [pip@bwflegal.co.uk](mailto:pip@bwflegal.co.uk), by telephone on 01279 464455, or by post at Suite 8 The Chestnuts, 4 Stortford Road, Great Dunmow, Essex, England, CM6 1DA.
- 2.5 We are a member of, and are governed by, the Recruitment and Employment Confederation.

### 3.0 What Does This Policy Cover?

- 3.1 This Privacy Policy applies to your use of our recruitment services and Our Site and the subsequent processing, analysis and storage of your personal data following your use and/or your Registration with Us to enable you to access our recruitment services.

3.2 Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

#### **4.0 What Is Personal Data?**

4.1 Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

4.2 Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

#### **5.0 What Are My Rights?**

5.1 Under the Data Protection Legislation, you have the following rights, which We will always work to uphold:

5.1.1 The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact Us to find out more or to ask any questions using the contact details under section 16.0 of this Policy.

5.1.2 The right to access the personal data We hold about you.

5.1.3 The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete.

5.1.4 The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that We hold.

5.1.5 The right to restrict (i.e. prevent) the processing of your personal data.

5.1.6 The right to object to Us using your personal data for a particular purpose or purposes.

5.1.7 The right to withdraw consent. This means that, if We are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.

5.1.8 The right to data portability. This means that, if you have provided personal data to Us directly, We are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.

5.1.9 Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

5.2 It is important that your personal data is kept accurate and up-to-date. If any of the personal data We hold about you changes, please keep Us informed as long as We have that data.

5.3 Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

5.4 If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact Us first, using the contact details in Section 16.0 of this Policy.

#### **6.0 What Data Do You Collect and How?**

6.1 Depending upon how you access our recruitment services; your use of Our Site and whether or not you Register with Us, We may collect and hold some or all of your personal data.

6.2 We receive your personal data when:

6.2.1 you search and view pages on Our Site;

- 6.2.2 when you make an enquiry with Us;
  - 6.2.3 when you apply directly for an advertised role via Our Site or contact us via Our Site or via email/telephone;
  - 6.2.4 when you upload a Curriculum Vitae via Our Site or send your Curriculum Vitae direct to Us via email;
  - 6.2.5 when you Register for an Account via Our Site and/or job alerts;
  - 6.2.6 when you Register with Us or contact one of our recruitment consultants direct for the purposes of facilitating a job search on behalf of a Client or a Candidate;
  - 6.2.7 during telephone conversations, email exchanges and face-to-face conversations and interviews/assessments with Us;
  - 6.2.8 when you provide verification documents to Us such as identification documentation, certifications etc...
  - 6.2.9 via a third party when you respond to an article, comment or a job post placed by BranWell Ford Associates Limited on a job board or social media.
- 6.3 When you use Our Site, Register with BranWell Ford Associates Limited or place a vacancy with Us, you must consent to Us collecting and storing your personal data. You will not be able to submit your enquiry or details to BranWell Ford Associates Limited without consenting to Us storing your personal data. This may include but is not restricted to:
- 6.3.1 your name;
  - 6.3.2 your email address;
  - 6.3.3 your telephone number;
  - 6.3.4 your home address;
  - 6.3.5 your employment history and work experience;
  - 6.3.6 your salary;
  - 6.3.7 your notice period;
  - 6.3.8 your general availability for interview/assessment and any reasonable adjustments that may need to be considered to enable you to attend an interview/assessment;
  - 6.3.9 your salary, mobility, and employment preferences;
  - 6.3.10 your education;
  - 6.3.11 links to your professional profiles available in the public domain e.g. LinkedIn, Twitter etc.; and
  - 6.3.12 your proof of eligibility to work in the UK and other certification documentation.
- 6.4 This information facilitates our ability to provide and conduct recruitment services for you and our Clients.
- 6.5 By explicitly providing consent when you use Our Site, Register with BranWell Ford Associates Limited or place a vacancy with Us, you are providing permission for our processing, analysis, and storage of your personal data.
- 6.6 BranWell Ford Associates Limited will never share your personal data, including your Curriculum Vitae, with a third party without your explicit consent.
- 6.7 If you do not consent to BranWell Ford Associates Limited processing, analysing or storing your personal data, please do not use Our Site; Register with Us; submit your Curriculum Vitae or other personal data to Us; or place any vacancy with Us.

## 7.0 Cookies

7.1 Our Site also uses Cookies and other similar technologies in order to distinguish you from other users. By using Cookies, We are able to provide you with a better experience and to improve Our Site by better understanding how you use it. Please read our Cookie Policy carefully and ensure that you understand it. Your acceptance of our Cookie Policy is deemed to occur when you accept, or when you have selected your preferred Cookie options, in our Cookie prompt on entering Our Site.

## 8.0 How Do You Use My Personal Data?

8.1 Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Providing and managing your access to Our Site.	Your IP address; your browser type; your browser version; your operating system; associated actions including how you interact with Our Site.	Consent and Legitimate Interests in understanding how users use Our Site so as to improve our services to users.
Providing and managing your Account on Our Site and/or job alerts	Your IP address; your browser type; your browser version; your operating system; your name; your email address; associated actions including how you interact with Our Site; when your Account is created, when you log in/out; what job alerts you create and any changes to your Account.	Consent and Legitimate Interests to provide you with an Account to enable you to access some of our recruitment services.
When you Register to be a Candidate with Us.	your name; your email address; your telephone number; your home address; your employment history and work experience; your salary; your notice period; your general availability for interview/assessment and any reasonable adjustments that may need to be considered to enable you to attend an interview/assessment; your salary, mobility, and employment preferences; your education; links to your professional profiles available in the public domain e.g. LinkedIn, Twitter etc.; your proof of eligibility to work in the UK and other certification documentation; and what jobs you may wish to apply for and any other personal data that you may choose to provide to Us in order to a facilitate a recruitment search on your behalf.	Legitimate Interests in providing a recruitment service to you.

What We Do	What Data We Use	Our Lawful Basis
<p>Via a third party when you respond to a job post placed by Us on a job board or social media on behalf of a Client.</p>	<p>your name; your email address; your telephone number; your home address; your employment history and work experience; your salary; your notice period; your general availability for interview/assessment and any reasonable adjustments that may need to be considered to enable you to attend an interview/assessment; your salary, mobility, and employment preferences; your education; links to your professional profiles available in the public domain e.g. LinkedIn, Twitter etc..; your proof of eligibility to work in the UK and other certification documentation; and what jobs you may wish to apply for and any other personal data that you may choose to provide to Us in order to a facilitate a recruitment search on your behalf.</p>	<p>Legitimate Interests in providing a recruitment service to you.</p>
<p>When you upload your CV on Our Site</p>	<p>your name; your email address; your telephone number; your home address; your employment history and work experience; your salary; your notice period; your general availability for interview/assessment and any reasonable adjustments that may need to be considered to enable you to attend an interview/assessment; your salary, mobility, and employment preferences; your education; links to your professional profiles available in the public domain e.g. LinkedIn, Twitter etc..; your proof of eligibility to work in the UK and other certification documentation; and what jobs you may wish to apply for and any other personal data that you may choose to provide to Us in order to a facilitate a recruitment search on your behalf.</p>	<p>Consent and Legitimate Interests in providing a recruitment service to you.</p>

<b>What We Do</b>	<b>What Data We Use</b>	<b>Our Lawful Basis</b>
When a Client places a vacancy with Us	your name; your email address; your telephone number; your job title; scheduling information or availability to participate in assessment/interviews relating to the vacancy; any business documents provided to Us to enable you to use Our recruitment services and for Us to bill those services to you; and any other personal data that you may choose to provide to Us in order to a facilitate a recruitment search on behalf of your organisation.	Performance of a Contract and Legitimate Interests in providing a recruitment service to you.
When you make a general enquiry with us either via social media, email, telephone, messaging service or via Our Site and our ongoing communication with you.	your name; your email address; your telephone; your address; the status of an application on your behalf and any specific feedback about your application; messages sent via email, mobile device or left on voicemails; attachments sent to Us by you.	Legitimate Interests in providing a recruitment service to you.
Communicating with Clients.	your name; your email address; your telephone number; your job title; scheduling information or availability to participate in assessment/interviews relating to the vacancy; any business documents provided to Us to enable you to use Our recruitment services.	Performance of a Contract and Legitimate Interests in providing a recruitment service to you.

- 8.2 We will only use your personal data for the purpose(s) for which it was originally collected unless We reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If We do use your personal data in this way and you wish Us to explain how the new purpose is compatible with the original, please contact Us using the details in section 16.0 of this Policy.
- 8.3 If We need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, We will inform you and explain the legal basis which allows Us to do so.
- 8.4 In some circumstances, where permitted or required by Law, We may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.
- 8.5 We will only send your personal data to our Clients with your explicit consent. Such transfers are performed in the course of the job search, application, and interview process. Such personal data will be processed in accordance with these terms and those of the relevant Client.
- 8.6 We send certain Client related information to Candidates. This may include job descriptions including salary and benefits details; information about the Client's organisation; the Client's representative's name and location and the status of the Candidates application with the Client.

8.7 We may use third parties to perform services in connection with our operations. This may include the provision of recruitment services to you, Candidates and Clients; to improve Our Sites; to protect users of Our Site and our recruitment services and better understand their needs; to optimize our recruitment services and the experience of users of Our Site. These services may have access to personal data in the course of providing these functions.

8.8 This Policy also applies to our use of non-personal data. We may use and disclose non-personal data for any purpose, except where we are required to do otherwise under applicable Law.

### **9.0 How Long Will You Keep My Personal Data?**

9.1 Due to the nature of recruitment, Candidates may periodically reconnect with Us as We support their career growth over a number of years. It is not uncommon for this to occur a number of years after We have placed them in a role. Likewise we endeavour to have long established relationships with our Clients.

9.2 We will only retain personal data for as long as We need it for our legitimate business interests. This may be for a period of a maximum of 7 years if you have been through a recruitment process with Us. If We have not processed your data in connection with a recruitment process for a period of 24 months after originally obtaining your consent to do so, We will delete it in accordance with our data retention policy.

### **10.0 How and Where Do You Store or Transfer My Personal Data?**

10.1 We use reasonable security measures to help protect your personal data however, no method of storage of information or transmission via the internet can be 100% secure. For example, emails or other messages sent via your web browser or CV's shared with Clients may not be encrypted by the recipient. Where the security of your personal data is beyond our control, we cannot guarantee the privacy of such information.

10.2 We may store or send some or all of your personal data to third party providers who help us with our operations and are based in countries outside of the UK. We will take all reasonable steps to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation.

10.3 The security of your personal data is important to Us, and to protect your data, We take a number of important measures, including the following:

- limiting access to your personal data to those employees with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- only sharing details of your personal data to third parties upon receipt of your explicit consent;
- ensuring that all of our IT systems are protected via a number of secure methods which include complex passwords, mobile device encryption, two-factor authentication, and the use of secure servers;
- having procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where We are legally required to do so.

10.4 In the unlikely event that our computer systems are compromised and there is a potential loss of confidentiality, We will report this breach to you.

10.5 In the unlikely event that personal data is taken or exposed from our records without our consent, We will provide reports surrounding that expose within 72 hours of being notified of such an event and take any action necessary to restore the security of your personal data.

### **11.0 Do You Share My Personal Data?**

11.1 We will not share any of your personal data with any third parties for any purposes, subject to your explicit consent and as described in this Policy, and subject to the following exceptions.

- 11.2 If We sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that We have used it, as specified in this Privacy Policy.
- 11.3 In some limited circumstances, We may be legally required to share certain personal data, which might include yours, if We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.
- 11.4 If any of your personal data is shared with a third party, as described in this Policy, We will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the Law.

## **12.0 How Can I Amend My Personal Data?**

- 12.1 You can amend your personal data by contacting us via one of the methods as detailed under section 16.0 of this Policy.
- 12.2 Upon receipt of a request to amend your personal data, and once We have verified your identity, We will ensure that your personal data is amended within thirty days.

## **13.0 How can I Delete My Personal Data?**

- 13.1 You can delete your personal data by contacting us via one of the methods as detailed under section 16.0 of this Policy.
- 13.2 Upon receipt of a request to delete your personal data, and once We have verified your identity, We will ensure that your personal data is deleted within thirty days.
- 13.3 Where We have placed a Candidate in a role, We are required to retain evidence of that placing so that contractual obligations can be met by the Client. We will however, take steps to ensure only minimal personal data is retained and We will not make further contact with the Candidate.
- 13.4 Where you might be interviewed by one of our Clients, We may be required to maintain records of those interviews to enable Us to comply with reporting information that they have requested. In such cases We will minimise the data We hold about you and will not contact you further.
- 13.5 Where We have received your explicit consent to share personal data with a third party, for example for an interview for a role, We undertake to advise that third party of your wish to have your personal data deleted by them.

## **14.0 Can I Withhold My Personal Data?**

- 14.1 You may access certain areas of Our Site without providing any personal data at all. For more information, please see our Cookie Policy.
- 14.2 However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

## **15.0 How Can I Access My Personal Data?**

- 15.1 If you want to know what personal data We have about you, you can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".
- 15.2 All subject access requests should be made in writing and sent to Pip Raffael, Managing Director, BranWell Ford Associates Limited, Suite 8 The Chestnuts, 4 Stortford Road, Great Dunmow, Essex, England, CM6 1DA.
- 15.3 There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.
- 15.4 Once We have verified your identity, We will respond to your subject access request within thirty days. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be kept fully informed of our progress.
- 15.5 We will provide the personal data in a portable format. We will not release personal data to any third party.



15.6 In the unlikely event you find personal data stored about you by BranWell Ford Associates Limited that is inaccurate, you must advise Us immediately. We will amend your personal data held on our systems within thirty days.

#### **16.0 How Do I Contact You?**

16.1 To contact Us about anything to do with your personal data and your data protection, including to make a subject access request, please use the following contact details:

BranWell Ford Associates Limited, Suite 8 The Chestnuts, 4 Stortford Road, Great Dunmow, Essex, England, CM6 1DA.

Or via email: [recruit@branwellford.co.uk](mailto:recruit@branwellford.co.uk).

Or via telephone: 01279 464455.

#### **17.0 How Do I Make a Complaint About My Personal Data**

17.1 If you have a complaint about the way your data is stored or handled by BranWell Ford Associates Limited, please contact Us via [recruit@branwellford.co.uk](mailto:recruit@branwellford.co.uk).

17.2 Alternatively you can write to Us at: BranWell Ford Associates Limited, Suite 8 The Chestnuts, 4 Stortford Road, Great Dunmow, Essex, England, CM6 1DA for the attention of Pip Raffael, Managing Director.

17.3 If you remain unhappy with the handling of your data you can complain to the Information Commissioner's Office at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

#### **18.0 Changes to this Privacy Policy**

18.1 We may change this Privacy Policy from time to time. This may be necessary, for example, if the Law changes, or if We change our business in a way that affects personal data protection.

18.2 Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 11<sup>th</sup> November 2022.