



## 1. Introduction and General Terms

This Privacy Policy explains what we do with your personal data, whether we are in the process of helping you find a job, continuing our relationship with you once we have found you a role, providing you with a service, receiving a service from you, using your data to ask for your assistance in relation to one of our candidate, or you are visiting our website. It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights. This Privacy Policy applies to the personal data of our Website users, Candidates, clients, suppliers and other people whom we may contact.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

## 2. Who are we?

Clever Careers T/as Clever HR is a recruitment agency specialising in financial services and wealth management and have employees who have been working with businesses and recruiting for many years.

### Our Online Services

Our website; [clever-hr.uk](http://clever-hr.uk), is run internally by staff at Clever HR and occasionally we will enlist the help of an external Drupal developer. For more information, please get in contact.

## 3. Who controls your personal data?

- The Data Controller is Clever Careers Limited (Clever HR) a company registered in the UK: Company Number: 09192512
- Address: Office Suite 3C, Bowling Hill Business Park, Chipping Sodbury, Bristol, BS37 6JL
- The Data Controller's data protection representative is the Director
- You can contact them at [hello@clever-hr.uk](mailto:hello@clever-hr.uk)
- You can call them on 01179 3790818
- Clever Careers Limited is registered as a Data Controller with the Information Commissioner's Office Certificate Number: ICO:00010196162

## 4. What kind of personal data do we collect?

**CANDIDATE DATA:** In order to provide the best possible employment opportunities that are tailored to you, we need to process certain information about you. We only ask for details that will genuinely help us to help you :

- Name
- Date of Birth
- Contact Details
- Address of residency
- Education Details
- Employment History
- Emergency Contacts
- Immigration Status
- Financial Information (Where we need to carry out financial background checks)

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- And where appropriate and in accordance with local laws and requirements:
  - Health
  - Diversity Information
  - Details of Criminal Convictions
  - Bank details
  - Passport

**CLIENT DATA:** We need to collect and use information about you, or individuals at your organisation, in the course of providing you services such as: (i) finding candidates who are the right fit for you or your organisation. The data we collect about Clients is actually very limited. We generally only need to have:

- Name
- Contact Details
- Job Role

We may also hold extra information that someone in your organisation has chosen to tell us.

**SUPPLIER DATA:** We need a small amount of information from our Suppliers to ensure that things run smoothly. We need contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us).

**WEBSITE USERS:** We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, and the times that our website is most popular.

## 5. How do we collect personal data?

**CANDIDATE DATA:** There are two main ways in which we collect your personal data:

1. Directly from you (e.g. a CV, application or registration form);
2. From third parties (please note that this list is not exhaustive):
  - A client
  - Other candidates
  - Online jobsites
  - Marketing databases
  - The public domain
  - Social Media such as LinkedIn
  - At interview
  - Conversations on the telephone
  - Notes following a conversation or meeting
  - Our websites and software applications

Where you are a Candidate and we have obtained your personal data from a third party such as an online job board, it is our policy to advise you of the source when we first communicate with you.

**CLIENT DATA:** There are two main ways in which we collect your personal data: 1 Directly from you; and 2 From third parties (e.g. our Candidates) and other limited sources (e.g. online and offline media).

**SUPPLIER DATA:** We collect your personal data during the course of our work with you.



**WEBSITE USER:** We may also collect information automatically about your usage of our website using cookies and other technology (for full details of what we use see the section below on “Cookies”). To that effect, we use your IP address (a series of numbers that identifies a computer on the internet) to collect, among other things, internet traffic data and data regarding your browser type and computer. If you do not want to receive cookies, you may reject them by using your browser settings (for help with how to do this see the section below on “Cookies”).

## 6. How do we 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 we have about you, your skillset and your ambitions, the more bespoke we can make our service. The processing of your personal information may include:

- Collecting and storing your personal data
- Notifying you of potential roles or opportunities
- Assessing and reviewing your suitability for job roles
- Introducing and/or supplying you to actual or potential Clients
- Engaging you for a role with us or with our Clients, including any related administration e.g. timesheets and payroll
- Sending information to third parties with whom we have or intend to enter into arrangements which are related to our Recruitment Services
- Providing information to regulatory authorities or statutory bodies, and our legal or other professional advisers including insurers
- Retaining a record of our dealings
- Establishing quality, training and compliance with our obligations and best practice for the purposes of backing up information on our computer systems

**CLIENT DATA:** The main reason for using information about Clients is to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly. This may involve: (i) identifying candidates who we think will be the right fit for you or your organisation

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

**WEBSITE USER:** Information gathered through cookies and similar technologies are used to measure and analyse information on visits to our websites, to tailor the websites to make them better for visitors and to improve technical performance. We will not use the data to identify you personally or to make any decisions about you.

## 7. Who do we share your personal data with?

**CANDIDATE DATA:** Primarily we will share your information with prospective employers to increase your chances of securing the job you want.

**CLIENT DATA:** We will share your data: (i) primarily to ensure that we provide you with a suitable pool of Candidates.



## 8. How do we safeguard your personal data?

Some of the information you provide to us will be held on our computers in the UK and will only be accessed by or given to our staff working in the UK. Some of the information you provide to us may be transferred to, stored and processed by third party organisations which process data for us and on our behalf. These third parties may be based (or store or process information) in the UK or elsewhere including outside of the EEA. We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## 9. How long do we keep your personal data for?

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

## 10. Information security

Clever Careers Limited has in place administrative, technical and physical measures on our website and internally designed to guard against and minimise the risk of loss, misuse, unauthorised access or disclosure, alteration, or destruction. Only employees who need the information to perform a specific job are granted access to your information. Where we transfer information to third parties to enable them to process it on our behalf, we ensure that the providers meet or exceed the relevant legal or regulatory requirements for transferring data to them and keeping it secure. We will also ensure that where information is transferred to a country or international organisation outside of the UK/EEA, we will comply with the relevant legal rules governing such transfers.

Clever Careers Limited employees are permitted to add, amend or delete personal data from Clever Careers Limited database(s) (paper based and/or electronically). All employees should ensure that adequate security measures are in place.

For example:

- Computer screens should be locked when stepping away from desks.
- Clever Careers Limited's clear desk policy should be adhered to.
- Passwords only disclosed to relevant staff members when required.
- Email should be used with care ensuring data sent goes to the intended recipient.
- Personnel files and other personal data should be stored in a place in which any unauthorised attempts to access them will be noticed.
- Personal data should be disposed of appropriately – stored safely and then shredded or destroyed.

It should be remembered that the incorrect processing of personal data e.g. sending an individual's details to the wrong person, allowing unauthorised persons access to personal data, or sending information out for purposes for which the individual did not give their consent, may give rise to a breach of contract and/or negligence leading to a claim against Clever Careers Limited for damages from an employee, work-seeker or client contact. A failure to observe the contents of this policy will be treated as a disciplinary offence.

## 11. How can you access, amend or take back the personal data that you have given to us?

You have certain rights in relation to your personal information.

You have the right to request that we:

- Provide you with a copy of your personal information that we hold

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- Update your personal information where it is out-of-date or incorrect
- Delete personal information that we hold
- Restrict the way in which we process your information
- Consider any valid objections to our processing of your personal information
- Withdraw your consent at any time
- Provide information you have given us to a third-party provider of services (where our lawful basis for processing is consent and where processing is automated)

Please note that should you exercise your right to request that we erase data or cease any processing activity, we may retain a record of this request and the action taken to both evidence our compliance, and to take steps to minimise the prospect of any data being processed in the future should it be received again from a third-party source. If you have any questions concerning your rights or should you wish to exercise any of these rights, please contact: [hello@clever-hr.uk](mailto:hello@clever-hr.uk)

We require you to prove your identity with 2 pieces of approved identification if you request a copy of the personal data Clever Careers holds on you. If your request is manifestly unfounded, excessive or repetitive then a reasonable fee of £10 could be charged for administrative costs.

Any requests of information should be sent to [hello@clever-hr.uk](mailto:hello@clever-hr.uk). Any requests will be responded to within one month of receiving the request and when requesting paper or electronic options are available.

We will need two copies of forms of identification, which can be:

- Passport
- Driving licence
- Birth certificate
- Utility bill (from last 3 months)
- Current vehicle registration document
- Bank statement (from last 3 months)
- Rent book (from last 3 months).

## 12. Can I find out what personal information Clever HR holds about me?

Under the General Data Protection Regulations 2018 you have the right to request a copy of the personal information that Clever HR holds for you and to have any inaccuracies corrected. (We require you to prove your identity with 2 pieces of approved identification). If your request is manifestly unfounded, excessive or repetitive then a reasonable fee of £10 could be charged for administrative costs.

Any requests of information should be sent to [hello@clever-hr.uk](mailto:hello@clever-hr.uk). Any requests will be responded to within one month of receiving the request and when requesting paper or electronic options are available.

We will need two copies of forms of identification, which can be:

- Passport
- Driving licence
- Birth certificate
- Utility bill (from last 3 months)
- Current vehicle registration document
- Bank statement (from last 3 months)
- Rent book (from last 3 months).



## 13. Changes to Privacy and Cookies Policy

We may make changes to this policy from time to time as our business and internal practices and/or applicable laws change. We will not make any use of your personal information that is inconsistent with the original purpose(s) for which it was collected or obtained (if we intend to do so, we will notify you in advance wherever possible) or otherwise than is permitted by applicable law.

## 14. Web Browser Cookies

### What is a cookie?

A cookie is a piece of data which is downloaded onto your computer and can be read by a simple text file. It includes a unique identifier that is set to your computer, tablet or mobile phone's web browser. Every website will have their own cookie as it allows the website to track online traffic flow. If you continue without changing your settings, we'll assume that you are happy to receive all cookies on our website.

### How do we use cookies?

Information supplied by cookies can help us to understand the profile of our visitors and help to tailor content so that it is relevant for our visitors.

### Third party cookies in embedded content on Clever HR pages

We often embed content from social media and other third-party websites when relevant. These may include Eventbrite, Vimeo, Facebook, Twitter, Instagram, LinkedIn, as well as others. As a result, when you visit a page containing such content, you may be presented with cookies from these websites and these third part cookies may track your use on our website. Clever HR does not control these cookies and we encourage you to check the third party's website for more information. If you continue without changing your settings, we'll assume that you are happy to receive all cookies from our website.

Where we embed content from social media and other third-party websites, some websites may use Google Analytics to collect data about user behaviour for their own purposes. Clever HR does not control this. For more information, see the Google webpage "[How Google uses data when you use our partners' sites or apps](#)".

### How to reject cookies

It is important to note that if you change your settings to block certain cookies, you will still be able to use our website to the full of its ability.

## 15. How to contact us

If you would like to get in touch to discuss this policy, how we use your personal information, to exercise your rights or to provide feedback or make a complaint about use of your information, please contact us as follows:

Clever HR  
Office Suite 3C,  
Bowling Hill Business Park,  
Chipping Sodbury,  
Bristol,  
BS37 6JL  
Email: [hello@clever-hr.uk](mailto:hello@clever-hr.uk)  
Tel: 01173 790818



You can also contact the Information Commissioner's Office via <https://ico.org.uk/> for information, advice or to make a complaint.