

Harrier Search Ltd

Data Protection and Privacy Policy

1. INTRODUCTION

Harrier Search Ltd is committed to ensuring that the company is compliant with all data protection regulations. This data protection and privacy policy provides you with details of how Harrier Search Ltd are compliant to data protection regulations, including but not limited to the Data Protection Act 2018, the EU General Data Protection Regulation (the "GDPR") and the UK GDPR. This policy will also specify how Harrier Search Ltd collects, handles, processes, transports and stores personal data used in the course of the operation and administration of the company.

Harrier Search Ltd is a 'data controller' when the company directly collects personal data on individuals through different mechanisms, including employment candidates ("Candidates") and clients looking to recruit ("Clients") which volunteer their data, or by using publicly accessible Job Search databases.

Harrier Search Ltd is also a 'data processor' when it receives and uses personal data that has been collected by individuals and companies that it works on behalf of. Within this policy we will be referred to as "we", "us" or "our" for simplicity. The company's contact details can be found on page 4.

We have 2 main offerings: 1) Harrier Search, which is our internal recruitment agency; and 2) Harrier Candidates, which is our internal platform which houses a database of people on a no-names basis which may be searched by potential employers and also by Candidates who have signed up to the service to perform salary/skills benchmarking.

We will review this policy regularly to ensure we are compliant with any changes to data protection regulations.

2. WHAT DATA WE NEED and COLLECT

Harrier Search Ltd collects personal data about you as part of the functioning of the company. This personal data might be, for example, such as name, address, e-mail and telephone number, employment history and academic achievements. We do ask for an idea of Candidates' current and expected salaries, but this is to help Harrier Search Ltd provide a better service and will not be shared with any of our Clients without permission.

Purpose/Activity	Type of data	Lawful basis for processing
As part of recruitment	(a) Candidate and Client	Performance based on a

work undertaken on behalf of Clients under Harrier Search	identity (b) Candidate and Client contact details	contract
To manage our relationship with you which includes: (a) Notifying you about changes to our terms or privacy policy (b) General enquiries	(a) Identity (b) Contact	(a) Performance based on a contract (b) Necessary to comply with a legal obligation
Management of our Harriers Candidates platform	(a) Candidate and Client identity (noting that Candidates will be housed on a no-names basis) (b) Candidates and Client contact details	Performance based on a contract
Providing access to Clients and Candidates to Harrier Candidates	(a) Candidate and Client identity (b) Candidate and Client log-in details	Performance based on a contract
Providing Candidate CVs to Clients	(a) Candidate identity (b) Candidate contact details (c) Candidate employment history and academic achievements	We will only pass such data to Clients with Candidates' consent.
Allowing Candidates to benchmark themselves against industry peers within a no-names database	(a) Candidate current salary details	Performance based on a contract
Enabling Clients and Candidates to hold fair and transparent salary negotiations	(a) Candidate desired salary details	Performance based on a contract

3. WHY WE NEED IT and SEEKING YOUR CONSENT

Your consent: This applies where you provide your personal data and consent to us using it to provide you with a specific service. At times, we need to know your personal data in order to contact you as set out above.

As part of our work, we might compile personal data about you using publicly accessible databases or government registers as set out above. We will only gather this information as part of performing our work. Where this data is not obtainable online, we may write to you to request your contact details so that we can directly engage with you.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted.

Harrier Search Ltd's core use of personal data is to assess and recommend Candidates on behalf of our Clients.

Personal data may be used if we need to perform a contractual obligation based on our work with third parties (companies and individuals), or to comply with a legal or regulatory obligation.

As part of our contractual obligations, we are required to seek your permission before adding your contact details to any databases which are held by the third parties from whom we undertake contractual obligations. We will always contact you before sharing any personal data to seek your approval for Harrier Search Ltd to pass on this data to third parties.

Harrier Search Ltd will seek written confirmation from the third parties to ensure that they are compliant with all applicable data protection regulations.

Harrier Search Ltd does not at this time use personal data for marketing purposes, and we will contact Candidates in advance before any marketing initiatives such as a newsletter are commenced.

5. DISCLOSURES OF YOUR PERSONAL DATA

Further to section 4, we may have to share your personal data with other parties based on legal requirements. This could include other contractors working with the third parties from whom we undertake contractual obligations, for example a third party providing background checks. Harrier Search Ltd will seek written confirmation from the third parties to ensure that these contractors are compliant with all applicable data protection regulations.

In particular, Harrier will transfer such Candidate personal data to Clients as is necessary to enable it to provide its recruitment services and administer its Harrier Candidates platform. In the case of Harrier Candidates, Clients will have the ability to search a database which contains Candidate employment history, academic achievements and salary expectations but not Candidate names or contact details. However, Harrier will not provide any further data or a Candidate's CV to Clients without the Candidate's specific prior consent.

Harrier Search Ltd will not transfer your data beyond the UK or European Economic Area ("EEA") unless the Candidate has consented by listing a specific non-UK or non-EEA country in their Candidates Form.

6. DATA SECURITY AND DATA STORAGE

We have taken necessary steps to protect your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Harrier Search Ltd is committed to storing as little personal data as is required based on our contractual obligations. Personal data is stored on computers and held by the owner and via a proprietary website (Harrier Candidates) hosted on external AWS servers within the UK.

These computers are password protected and have up-to-date anti-virus and malware protection software installed. No information will be passed on to third parties without informing you and obtaining your consent.

There are two members of staff in Harrier Search Ltd.

7. DATA RETENTION

The length of time we will hold or store your personal information for will depend on the services we perform for you and for how long you require these. As we often support Candidates with placements over many years, and potentially throughout their careers, the purpose for which we retain Candidate data is often an ongoing purpose. We conduct regular data-cleansing and updating exercises with our Candidates to ensure that (a) the data that we hold is accurate and (b) we are not holding data for too long.

Our standard terms of business state that our Clients should retain Candidate data such as CVs for the purposes of the specific role you apply for and that, as controllers of your data, they should inform you if they plan to retain your CV on file in order to notify you about potential future roles, or to otherwise hold or use your data for other purposes.

8. USE OF COOKIES

The Harrier Candidates website <https://www.harriercandidates.com> uses cookies. Cookies are small data files which the Site places on your computer or handheld device. This is normal practice for websites. Cookies are essential to help us provide a high-quality website. By collecting information through cookies and other automated means on our Site, we learn how to best tailor the Site to our visitors.

The Cookies that we use and why: We use third party cookies to analyse your visiting patterns on our Site and other trends and statistics regarding your use of our Site and the sites from which you visited us (referrers). These cookies are set by Google Analytics. Using these cookies helps us deliver the best web experience for you, and to understand what our readers are looking at so that we can produce more of the right kind of content. Our use is subject to Google's current cookie policy, which you can find here <http://www.google.com/analytics/learn/privacy.html>. We do not use cookies to track your Internet browsing activities before or after you visit the Site

Consent to use Cookies: By browsing and using our website, you consent to the above cookies being used in the way described in this Cookie Policy. If you do not consent, you can disable cookies by adjusting your browser settings or stop using the site.

9. 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 to 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.
- Right to lodge a complaint with a supervisory authority, such as the Information Commissioner's Office (ICO)

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 henry@harriersearch.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. 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 two months rather than one month if your request is particularly complex or you have made a number of requests.

10. CONTACT DETAILS

Registered Address: Framlingham Technology Centre, Station Road, Framlingham, Woodbridge, Suffolk, IP13 9EZ.

Email address: henry@harriersearch.com

11. FILING A COMPLAINT

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the ICO, the UK supervisory authority for data protection issues (www.ico.org.uk). We would be grateful if you would contact Harrier Search Ltd first if you do have a complaint so that we can try to resolve it for you.