



ARDEN RESOURCING

DELIVERING EXPERTISE

PRIVACY POLICY FOR CLIENTS OF ARDEN RESOURCING LIMITED

1. INTRODUCTION

1.1 In this Privacy Policy:

- 1.1.1 references to **we, us** or **our** means Arden Resourcing Limited, a limited company registered in England (company number: 07549788), whose registered office is 5 Woodrow Crescent, Solihull, B93 9EF. Our VAT registration number is 109975870;
- 1.1.2 references to **you** or **your** means the person accessing and using the Website (as defined below);
- 1.1.3 references to the **Website** means the website found at www.ardenresourcing.com; and
- 1.1.4 references to the **Services** means the recruitment consultancy services that we make available to you.

2. PRIVACY POLICY

- 2.1 This Privacy Policy (together with any other documents referred to in it) sets out the basis on which we collect and use personal information about you through your use of the Website and the Services.
- 2.2 This Privacy Policy describes in detail who is responsible for the personal information that we collect about you, what personal information we collect, how we will use such personal information, who we disclose it to and your rights and choices in relation to your personal information.
- 2.3 In this Privacy Policy where we use the words **personal information** we use these words to describe information that is about you and which identifies you.
- 2.4 You have the right to object to our use of your personal information. A summary of your right to object and the details of who to contact if you want to exercise this right can found at paragraph 10 below.

3. WHO IS RESPONSIBLE FOR THE PERSONAL INFORMATION THAT WE COLLECT?

- 3.1 We are the data controller for the purpose of data protection law, in respect of your personal information collected and used through your use of the Website and the Services. This is because we dictate the purpose for which your personal information is used and how we use your personal information.

4. WHAT PERSONAL INFORMATION DO WE HOLD ABOUT YOU?

- 4.1 We collect and use personal information about you in the course of providing the Website and the Services. The personal information we collect includes:

4.1.1 **Information that you provide to us**

The information that you provide to us may include your name, postal address, email address, telephone number, financial account number and bank account details, credit history, credit reference information and credit score. This information will be provided:

- (a) in the course of communications between you and us (including by phone, email or otherwise);
- (b) when you fill in forms for us (including those on the Website); and
- (c) via our social media pages, other social media content, tools and applications.

4.1.2 Information we collect from you

- (a) information about your use of the Website and the Services;
- (b) information contained in and records of communications between you and us, including emails, letters and text messages. We also record calls between us for training, monitoring and quality control purposes;
- (c) information regarding your marketing preferences; and
- (d) information that you have supplied to us which you obtained from reference checking agencies (including your credit rating).

4.1.3 Information we receive from other sources

- (a) information we obtain from publicly available sources such as Facebook and LinkedIn.

5. HOW DO WE USE THE PERSONAL INFORMATION WE COLLECT ABOUT YOU?

5.1 We use your personal information in connection with the provision of the Website and the Services to you. In particular, your personal information will be used by us, our employees, service providers, and disclosed to third parties for some of the following specific purposes set out in the table below. For each of these purposes, we have set out the legal basis on which we use your personal information.

Purpose	Legal Basis
To communicate with you and other individuals.	This is in our legitimate interests to enable us to provide the Services to you.
To provide our Services (including assisting you with finding candidates for any vacancies you have).	This is in our legitimate interests to enable us to develop our business operations and our Services.
To provide you with information about candidates that may be suitable for any vacancies you have.	This is in our legitimate interests to enable us to provide the Services to you.
To carry out our obligations arising from any contracts entered into between you and us and to provide you with the Services.	This is to perform a contract between you and us or in our legitimate interests.
To send you marketing information in conjunction with any preferences you express.	We can do this based on your consent.
To notify you about changes to the Website or the Services.	This is in our legitimate interests to enable us to improve and develop of our business operations and the Services.
To improve the quality of the Website, the Services and our training.	This is in our legitimate interests to enable us to enhance, modify, personalise the Website and the Services for your benefit.
To manage complaints, feedback and queries.	This is in our legitimate interests to enable us to improve and develop of our business operations and the Services.
To comply with any legal or regulatory obligations (including in connection with a court order).	We do this for compliance with legal obligations to which we are subject.
To enforce or apply the agreements concerning you (including agreements between you and us).	This is in our legitimate interests to ensure that we can fulfil our obligations to you which relate to the provision of the Services.

5.2 Where we process your personal information on the legal basis of our legitimate interests (as set out in the table above), we have carefully considered and assessed your rights and freedoms which require protection of

your personal information in respect of each specific purpose. Having undertaken this assessment, we have determined that our legitimate interests in respect of each specific purpose do not override your fundamental rights and freedoms, taking into account your reasonable expectations based on the Services that we provide to you. For further information about how we have balanced your rights and freedoms against our legitimate interests, please contact us using the details at paragraph 12 below.

5.3 We may be required to obtain your personal information to comply with our legal requirements, to enable us to fulfil the terms of our contract with you or in preparation of us entering into a contract with you. If you do not provide the relevant personal information to us, we will not be able to provide the Website and the Services to you.

6. WHO MAY WE DISCLOSE YOUR PERSONAL INFORMATION TO?

6.1 You agree that we may share your personal information with:

- 6.1.1 our business partners, suppliers and sub-contractors for the performance of any contract we enter into with you;
- 6.1.2 our professional advisors (including accountants and lawyers) that assist us in carrying out our business activities;
- 6.1.3 any candidates who we provide consultancy services to for the purpose of carrying out our activities; and
- 6.1.4 external agencies and organisations (including the police, the relevant local authority and other law enforcement agencies) for the purpose of complying with applicable legal and regulatory obligations.

6.2 We will also disclose your personal information to other third parties, for example:

- 6.2.1 in the event that we sell or buy any business or assets, we will disclose your personal information to the prospective seller or buyer of such business or assets;
- 6.2.2 if we or substantially all of our assets are acquired by a third party, personal information held by us will be one of the transferred assets; and
- 6.2.3 if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our Website Terms of Use.

7. WHERE WILL WE TRANSFER YOUR PERSONAL INFORMATION?

7.1 We will process your personal information both within and outside the European Economic Area (**EEA**) (including to the United States of America, Israel, Russia, Australia and South Africa).

7.2 When we transfer your personal information outside the EEA, we will take reasonable steps to ensure that such information will be adequately protected, in particular by using standard data protection clauses which have been adopted by the European Commission and can be accessed [here](#). This approach is compliant with applicable data protection law. For further information about these transfers and the safeguards in place (including to obtain a copy of any documents in place), please contact us using the details at paragraph 12 below.

7.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to the Website and any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access.

8. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION?

8.1 We will keep your personal information for as long as is necessary given the purposes for which we collect and use your personal information which will not exceed two years after any contract between us expires or terminates, unless a longer period is required or permitted by law. For further information about how long we keep your personal information, please contact us using the details at paragraph 12 below.

9. YOUR RIGHTS

You have certain rights with respect to your personal information. The rights will only apply in certain circumstances and are subject to certain exemptions. Please see the table below for a summary of your rights and who to contact to exercise them.

	Summary of your rights	Who to contact
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you and information about how we use it, subject to certain exemptions.	yourdata@ardenresourcing.com
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.	yourdata@ardenresourcing.com
Right to erasure of your personal information	You have the right to ask that your personal information be deleted in certain circumstances. For example (i) where your personal information is no longer necessary in relation to the purposes for which they were collected or otherwise used; (ii) if you withdraw your consent and there is no other legal ground for which we rely on for the continued use of your personal information; (iii) if you object to the use of your personal information (as set out below); (iv) if we have used your personal information unlawfully; or (v) if your personal information needs to be erased to comply with a legal obligation.	yourdata@ardenresourcing.com
Right to restrict the use of your personal information	You have the right to suspend our use of your personal information in certain circumstances. For example (i) where you think your personal information is inaccurate and only for such period to enable us to verify the accuracy of your personal information; (ii) the use of your personal information is unlawful and you oppose the erasure of your personal information and request that it is suspended instead; (iii) we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or (iv) you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection.	yourdata@ardenresourcing.com
Right to data portability	You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible. The right only applies where the use of your personal information is based on your consent or for the performance of a contract, and when the use of your personal information is carried out by automated (i.e. electronic) means.	yourdata@ardenresourcing.com
Right to object to the use of your personal information	You have the right to object to the use of your personal information in certain circumstances. For example (i) where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); and (ii) if you object to the use of your personal information for direct marketing purposes.	yourdata@ardenresourcing.com
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.	yourdata@ardenresourcing.com

	Summary of your rights	Who to contact
Right to complain to the relevant data protection authority	You have the right to complain to the relevant data protection authority, which is in the case of Arden Resourcing Limited, the Information Commissioner's Office, where you think we have not used your personal information in accordance with data protection law.	yourdata@ardenresourcing.com

10. CHANGES TO OUR PRIVACY POLICY

Any changes we make to this Privacy Policy in the future will be posted on our website and, where appropriate, we will give you reasonable notice of any changes.

11. QUERIES

11.1 If you have any questions regarding this Privacy Policy or the way we use your personal information, you can contact us by:

11.1.1 telephone on +44 121 231 3065;

11.1.2 email at yourdata@ardenresourcing.com; or

11.1.3 post at First Floor, Two Snow Hill, Queensway, Birmingham, B4 6GA, United Kingdom.

This Privacy Policy was last updated in May 2018.