



## PRIVACY NOTICE

Trinnovo Group ("We") are committed to protecting and respecting your privacy.

Any mention of "Our Group" means our subsidiaries, our ultimate holding company and its subsidiaries, our associated companies as defined in section 1159 of the UK Companies Act 2006 (our Group).

This notice and any other documents set out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

### Data Protection Legislation

Even though the UK left the EU, the GDPR is still applicable in the UK. The Government intends for the GDPR to continue in UK law post Brexit and has therefore enforced the Data Protection Act 2018 and UK GDPR.

(a) Data Protection Act 2018 and UK GDPR; (b) the General Data Protection Regulation (EU) 2016/679; (c) the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as may be amended by the proposed Regulation on Privacy and Electronic Communications); and (d) any legislation that replaces or converts into United Kingdom law, UK GDPR, the General Data Protection Regulation (EU) 2016/679, the proposed Regulation on Privacy and Electronic Communications or any other law relating to data protection, and the processing of personal data and privacy resulting from the United Kingdom leaving the European Union.

The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

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

**For the purposes of data protection legislation in force from time to time the data controller is Trinnovo Group Ltd / Broadgate Search Ltd / Trust in Soda Ltd / BioTalent Ltd / Ex-Military Careers of 52 Bedford Row, London, WC1R 4LR.**

**Our nominated UK Data Protection Officer is Hayley Harkins of Trinnovo Group. Email – [hayley@trinnovo.com](mailto:hayley@trinnovo.com)**

**Our nominated EU Representative is Adam Brogden of Instant EU GDPR Representative Ltd. Email - [contact@gdprlocal.com](mailto:contact@gdprlocal.com)**

### Who we are and what we do

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We collect the personal data of the following types of people to allow us to undertake our business;



- Prospective and placed candidates for permanent or temporary roles;
- Prospective and live client contacts;
- Supplier contacts to support our services; and
- Employees, consultants, temporary workers

We collect information about you to carry out our core business and ancillary activities.

### **Information you give to us or we collect about you**

Personal Information is obtained in many ways including interviews, correspondence, by telephone and facsimile, by email, via one of our websites, from media and publications, from other publicly available sources and third parties. We don't guarantee website links or policy of authorised third parties.

It includes information you provide when you register to use our site, to enter our database, subscribe to our services, attend our events, participate in discussion boards or other social media functions.

The information you give us or we collect about you may include your name, address, private and corporate e-mail address and phone number, financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

### **Information we obtain from other sources**

This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card and personal recommendations.

### **Purposes of the processing and the legal basis for the processing**

We use information held about you in the following ways:

To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.

To provide you with information about other goods and services we offer that are similar to those that you have already been provided with or enquired about.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary or permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.



Our legal basis for the processing of personal data is our legitimate interests, described in more detail below, although we will also rely on contractual obligations to which you are subject, legal obligations and consent for specific uses of data.

We will rely on contractual obligations if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

### **Our Legitimate Interests**

Our legitimate interests in collecting and retaining your personal data are described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contact details is a fundamental part of this process.

In order to support our candidates' career aspirations and our clients' resourcing needs, we require a database of candidate and client personal data. The database will contain historical information as well as current resourcing requirements.

To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts and from time to time may share information with the sponsors of our events.

### **Consent**

Should we want or need to rely on consent to lawfully process your data we will request your consent verbally, by email or by an online process for the specific activity we require consent for and record your response on our system. You have the right to withdraw your consent to this particular processing at any time.

### **Other Uses we might make of your data:**

We will also use your data:

- To improve our site to ensure that content is presented in the most effective manner for you when you are using your computer or other devices;
- To notify you about changes to our service;
- To allow you to participate in interactive features of our service, when you choose to do so;
- As part of our efforts to keep our site safe and secure;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

**We record our telephone calls for the purposes of training and compliance.**



### **Do you have to provide us with personal data?**

You may refuse to give us your personal and sensitive personal data. Furthermore, you have the right to ask us to delete, change or stop processing your data that we have already received or collected. If you do not provide us with personal or sensitive personal data, or if you request a restriction of processing however, we may not be able to provide you with the services that you have requested and that are stated in this policy.

### **Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

### **Disclosure of your information inside and outside of the EEA**

We may share your personal information with:

Any member of our group both in the EEA and outside of the EEA.

Selected third parties including:

- Clients for the purpose of introducing candidates to them;
- Candidates for the purpose of arranging interviews and engagements;
- Clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you;
- Subcontractors including email marketing specialists, event organisers, payment and other financial service providers;
- Credit reference agencies, our insurance broker, compliance partners and other sub-contractors for the purpose of assessing your suitability for a role where this is a condition of us entering into a contract with you.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Trinnovo Group or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Trinnovo Group, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The lawful basis for the third party processing will include:

- Their own legitimate interests in processing your personal data, in most cases to fulfil their internal resourcing needs;



- Satisfaction of their contractual obligations to us as our data processor;
- For the purpose of a contract in place or in contemplation;
- To fulfil their legal obligations.

### **Where we store and process your personal data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services. By submitting your personal data, you agree to this processing. We will take all reasonable steps necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access any documentation, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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

### **Retention of your data**

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate interests and that you are happy for us to do so.

We do the following to try to ensure that the data we hold on you is accurate:

- prior to making an introduction we check that we have accurate information about you;
- we try to keep in touch with you so you can let us know of changes to your personal data.

We may store and handle your data in the following ways:

- We may archive part or all of your personal data, retain it on our financial systems only or delete all or part of the data from our main Customer Relationship Manager (CRM) system.
- We may pseudonymise parts of your data, particularly following a request for restriction or erasure of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

### **Your rights**



You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for marketing purposes or if we intend to disclose your information to any third party for marketing purposes. We will collect express consent from you, if legally required, prior to using your personal data for marketing purposes.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

#### **The GDPR provides you with the right to:**

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party in certain formats, if practicable.

#### **Access to information**

The Data Protection Act 2018 and the GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete. Your right of access can be exercised in accordance with the Act and the GDPR.

A subject access request should be submitted to the relevant Data Protection Officer (as listed above). No fee will apply unless the requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character. In such circumstances, we may charge a fee or refuse to act on the request.

#### **Changes to our privacy notice**

Any changes we make to our privacy notice in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

#### **Contact**



Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to Hayley Harkins on [hayley@trinnovo.com](mailto:hayley@trinnovo.com)

### Complaints

If you are unhappy with the way in which your personal data has been collected, stored or processed please contact the Data Controller using the contact details above.

If you remain dissatisfied, then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted by telephone on 0303 123 1113 or via their online notification system at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

### Version History

Version	Date	Description	Amended by	Approved by
1.0	25/10/18	Notice Created	Ellen Chamberlain	John Miller
1.1	01/08/20	Notice updated	Hayley Harkins	DJ Marker
1.2	11/02/21	Notice updated	Hayley Harkins	DJ Marker
1.3	26/02/21	Notice updated	Hayley Harkins	DJ Marker