

Solution Resources Data Protection Policy (DPP)

For the purposes of the Data Protection you consent to the Company holding and processing personal data including sensitive personal data of which you are the subject.

The kinds of data that the Company processes in connection with you are:

- Any references obtained during recruitment
- Payroll details
- Details of health and sickness absence records
- Contact names, addresses and telephone numbers of third parties.

Data Protection Generally

It is generally accepted that as employers we need to hold personal information on our employees. Personal information may include, marital status, place of birth and may also include personal details about our employees' family. We need to retain this information whilst you are employed but there may also be a requirement to hold some of this information beyond the termination of employment (i.e. for payroll and reference purposes).

We are required by law to meet certain obligations when processing or using employees' personal information. With regard to data protection the conduct for employers to follow is contained in the Employment Practice Data Protection Code.

The Data Protection Code is intended to assist employers and to establish good practice for the handling of personal data in the workplace. **The five parts of the code are:**

1. **Recruitment and Selection** - which concerns processing records, checking the accuracy of applications and pre-employment vetting.
2. **Employment Records** - about the collection, storage, disclosure and deletion of personnel records.
3. **Monitoring at Work** - covers the monitoring of worker's use of telephone & email systems.
4. **Medical Information** - about occupational health, medical testing, drug and genetic screening.
5. **Client Data:** this category covers our customers, clients, and others to whom Solution Resources provides services in the course of its business, to ensure that the contractual arrangements between both parties can run smoothly. This involve in identifying talented candidates who we (Solution Resources) think's will be the right fit for the client.

DATA PROTECTION

When personal information is collected, used or stored we have an obligation to protect that information from being improperly used or distributed. Individuals have the right to know what information is being held and the reasons why. The data protection principles apply whenever personal data or sensitive data is processed.

THE DATA PROTECTION PRINCIPLES

These are essentially principles of good business practice in relation to the collection, use and storage of data. The principles are:

PROCESSING DATA

"Processing" of personal data means obtaining, recording or holding information or data of carrying out any operation including organization, retrieval, use, disclosure, erasure or destruction of data. This also includes expression of opinion concerning individuals.

RIGHTS OF DATA SUBJECTS

Individuals are entitled to be given a description of the data, the purposes for which they are being processed and the recipients to whom they are or may be disclosed. To access personal files or data held on the Company's database the following procedure must be adhered to: -

- All requests for access to information must be in writing and addressed to the HR Head.
- Any employee requesting information must give a minimum of two weeks' notice in writing.
- The Personal Data Request — internal form must be completed in full.
- Request for information via a third party must contain a signed authorization from the employee.
- Personal files/data will be photocopied and will be provided 7 days after receipt of the request and sent by registered post to the address as stated on the Personal Data Request form.
- Anyone wishing to view their original file must give the required notice and be responsible for their own costs for travel to and from Personnel department and this must be in their own time and not Company time.

EXEMPTIONS TO THE RIGHT OF ACCESS – REFERENCES

Personal data consisting of a reference given in confidence in connection with the employment, education or training of the data subject may be exempt. The most common request is for access to references given by some other person, usually previous employers.

We are not obliged to comply with such a request if in giving the information we will be disclosing information relating to another identifiable individual (i.e. the person giving the reference) who has not given his consent. In dealing with requests for copies of references given by previous employers, the duty to give information should be balanced with the need to protect the identity of the referee.

If necessary, ask the person giving the reference whether they consent to a copy being given to the subject of the reference.

MONITORING OF TELEPHONE CALLS & EMAIL CORRESPONDENCE

There may at times be very good reasons for monitoring telephone calls or monitoring emails. This will only be carried out where it is deemed necessary either for training or quality control purposes and to ensure that as employees you are complying with company policies, procedures and legal requirements, health and safety rules or discrimination rules. Monitoring is not intended to intrude on the privacy of the employee.

Occasional personal use of email is permitted provided this does not interfere within your normal duties.

DATA PROTECTION TEMPORARY WORKERS

As a recruitment company we will hold large amounts of personal data of candidates therefore the basic principles need to be observed. We must only use their data for the purposes intended. As candidates register it is therefore obvious that they do so, to enable us to seek temporary or permanent work on their behalf and will be happy for us to send their details to prospective employers. This may be limited to one single employer therefore if you intend to send their details to other potential employers you should make this clear and ask if they object.

It is always better to ask a candidate when interviewing them to allow us to disclose information to respective employers or work givers. A note should be made to this effect by email.

ACCESS TO DATA

Candidates are entitled to receive copies of any data that is held about them. This will also include references received about them, but care should be taken not to reveal the identity of the individual giving the reference. If a verbal reference is obtained the DPA does not apply therefore you will not be required to divulge the information given to you in answer to a subject access request.

Candidates requiring access to their personal data must in each case adhere to the following procedure:

- All requests for access to information must be in writing and addressed to the Head of HR.
- Any temporary/permanent candidate requesting information must give a minimum of two weeks' notice in writing.
- The Personal Data Request - Candidates form must be completed in full.
- Requests for information via a third party must contain a signed authorization from the temporary/permanent candidate.
- Personal files/data should be photocopied, provided no later than 20 days after receipt of request and sent by registered post to the address as stated on the Personal Data Request form, or directly given to candidate.

DISPOSAL OF DATA

The Conduct Regulations state that application forms and CV's of candidates must be kept for at least one year from the date of their creation and at least one year after the date on which you last provided services to the client or the candidate.

CURRICULUM VITAE'S

- 1 year after placing the candidate in a permanent job or
- 1 year after the last date we actively sought employment on their behalf
- CV's never actively worked on can be destroyed at the discretion of the line manager; there is no legal limit for date of disposal.

APPLICATION FORMS — PERMANENT CANDIDATES

- 1 year after placing the candidate in a permanent job or
- 1 year after the last date we actively sought employment on their behalf
- Applications never actively worked on can be destroyed at the discretion of the line manager; there is no legal limit for date of disposal.

APPLICATION FORMS - TEMPORARY CANDIDATES

- 1 year after their last working date
- 1 year after the last date we actively sought employment on their behalf
- Applications never actively worked on can be destroyed at the discretion of the branch manager; there is no legal limit for date of disposal.