



Company Name:	Dosbarth CYF
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Dosbarth is a recruitment business which provides work-finding services to its clients and work-seekers. Dosbarth must process personal data (including special categories of personal data) so that it can provide these services – in doing so, Dosbarth acts as a data controller.

You may give your personal details to Dosbarth directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. Dosbarth must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you, we will only use your personal data in accordance with this privacy statement. We will comply with current data protection laws at all times.

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1. Collection and use of personal data

a. Purpose of processing and legal basis

Dosbarth will collect your personal data (which may include special categories of personal data) and will process your personal data for the purposes of providing you with work-finding services. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

On some occasions we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

- Your consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you

b. Legitimate interest

This is where Dosbarth has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where Dosbarth has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Managing our database and keeping work-seeker records up to date;
- Contacting you to seek consent where when needed;
- Providing work-finding services to you
- Contacting you with information about similar products or services that you have used from us recently;
- Passing work-seeker's information to debt collection agencies/other authorities.

c. Statutory/contractual requirement

Dosbarth has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements). Our clients may require this personal data, and we may need your data to enter into a contract with you. If you do not give us the personal data we need to collect in order to comply with our statutory and legal requirements, we may not be able to continue to provide work-finding services to you.

d. Recipient/s of data

Dosbarth will process your personal data and/or sensitive personal data with the following recipients:

- Clients that we have introduced to you e.g. schools, nurseries, local authorities.
- Candidates' former or prospective new employers that we have to obtain or provide references to;
- The Recruitment and Employment Confederation
- Any other third parties who carry out audits to ensure that we run our business correctly;
- Payroll service providers who manage our payroll on our behalf;
- Other recruitment agencies in the supply chain (e.g. master/neutral vendors and second tier suppliers);
- Our insurers;
- Our legal advisers;
- Our IT and CRM providers;



- Any public information sources and third party organisations that we may use to carry out suitability checks on work-seekers e.g. Companies House, the Disclosure and Barring Service (DBS), Education Workforce Council (EWC), DVLA, credit reference agencies etc.;
- Government, law enforcement agencies and other regulators e.g. the Police, Home Office, HMRC, Employment Agencies Standards Inspectorate (EASI), Local Authority Designated Officers (LADOs), GLAA;
- Trade unions;
- Any of your group companies; and
- Any other organisations you ask us to share your data with.

2. Information to be provided when data collected not from the data subject

- a. **Categories of data:** Dosbarth has collected the following personal data on you:

Personal data:

- Name, address, mobile no., email
- National insurance no.
- Nationality (through right to work check)

Special categories of personal data:

- Health information including whether you have a disability
- Criminal conviction(s)
- Bank details

- b. **Source of the personal data:** Dosbarth sourced your personal data/special categories of personal data:

- Jobs boards, LinkedIn, CV library
- A former employer
- A referee whose details you previously provided to us
- Software providers who we use to support our services including
- Cookies listed in section 5

This information did not come from a publicly accessible source.

3. Data retention

Dosbarth will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time. For example, the Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services. We are required to keep your records relating to the right to work in the UK 2 years after employment or the engagement has ended alterable and working time records including your 48 hour opt out notice annual leave/holiday records 2 years from the time they were created.

Additionally, we must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation. This is currently 3 to 6 years.

Where Dosbarth has obtained your consent to process your personal/ and special categories of personal data we will do so in line with our retention policy. Upon expiry of that period Dosbarth will seek further consent from you. Where consent is not granted Dosbarth will cease to process your personal/ and special categories of personal data.

4. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data Dosbarth processes on you;
- The right of access to the personal data Dosbarth processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to Dosbarth processing your personal data you have the right to withdraw that consent at any time by contacting Karen Jones Managing Director. Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where Dosbarth will still need to process your data for legal or official reasons. We will inform you if this is the case. Where this is the case, we will restrict the data to only what is necessary for the purpose of meeting those specific reasons.

If you believe that any of your data that Dosbarth processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

5. Cookies

We may obtain data about you from cookies. These are small text files that are placed on your computer by websites that you visit. Certain aspects of this site may require a visitor to permit a small text file, called a cookie, to be saved to their hard drive in order for those aspects to work appropriately. They are widely used in order to make websites work, or work more efficiently, as well as to provide

information to the owners of the site. Cookies will also allow Google Analytics and statistics software to track which areas of the website are accessed by a visitor, as per the description above. The website cannot function properly without these cookies.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

6. Login Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

7. Links to external websites

Dosbarth's website may contain links to other external websites. Please be aware that Dosbarth is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by Dosbarth's website.

8. Sale of the business

If Dosbarth's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business. Where the sale of the business results in the transfer of your details to a different data controller we will notify you of this.

9. Data Security

Dosbarth takes every precaution to protect users' information. The use of firewalls on all electronic devices, 2 Factor authentication, password protected and log ins for devices. Hard copies stored under lock and key.

Only employees who need the information to perform a specific job (for example, consultants, our accounts clerk or a marketing assistant) are granted access to your information.

Dosbarth uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/ the Internet is not entirely secure and for this reason Dosbarth cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/the Internet.

If you share a device with others, we recommend that you do not select the "remember my details" function when that option is offered.

If you have any questions about the security at our website, you can email Karen Jones – Karenjones@dosbarth.cymru

10. Changes to this privacy statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.



13. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact the head of HR department at: karenjones@dosbarth.cymru

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.



