

# Privacy policy

*By submitting data to Meritus Associates you give your consent that all personal data that you submit may be processed by us in the manner and for the purposes described in the following privacy policy.*

This Privacy Policy explains our current policies and practices with regard to Personal Data collected from you by Meritus Associates. We are committed to protecting and respecting your privacy. This policy also sets out the basis on which we process any Personal Data that you provide to us.

The term "Personal Data" refers to personally identifiable information about you, such as your name, birth date, telephone number, email address or mailing address.

For the purpose of the Data Protection Act 1998 ("the Act"), the data controller is Meritus Associates Ltd (Company no. 09433015) of 1-2 Broadgate Circle, 2<sup>nd</sup> Floor, London EC2M 2QS, registered as a data controller under the Act (registration number [NUMBER]).

The General Data Protection Regulation ("GDPR") (Regulation (EU) 2016/679) replaces the Data Protection Regulation (Directive 95/46/EC) from 25 May 2018. 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.

Your rights under GDPR are set out in this Privacy Policy, which will apply once GDPR becomes law on 25 May 2018.

## Information we may collect from you

Meritus Associates collects the personal data of prospective and placed candidates (for permanent and temporary roles), prospective and current client contacts, supplier contacts, employees, consultants and temporary workers in order to enable us to carry out our business services.

### How we collect Personal Data

#### *Candidates:*

#### Information you give to us

- By emailing your CV to Meritus Associates.
- By being interviewed by us via telephone, skype or in person.
- By sending or leaving a hard copy of your CV with Meritus Associates
- By communicating information to us via phone, email, text or post

#### Information we receive from third parties

- Personal information shared by clients.
- Referees may disclose your personal information.
- Personal information may be collected from sources such as LinkedIn and job sites which you are subscribed to.
- Social Media (Twitter, Facebook etc.).
- By referrals from a third party.

#### *Clients:*

In our commitment to provide you with the best possible service and to ensure that we supply you with the most suitable Candidates for your organisation, we collect your personal data in the following ways:

#### Information you give to us

- By contacting Meritus Associates via telephone, email or online professional networking sites such as LinkedIn.
- When Meritus Associates contacts you via telephone, email, online professional networking sites such as LinkedIn, or in person.

#### Information we receive from third parties

- By contacting Meritus Associates via telephone, email or online professional networking sites such as LinkedIn.
- Search engines, social media, online professional networking sites such as LinkedIn

#### *Suppliers:*

- We will collect personal data in the course of working with you.
- We will collect personal data from Clients or Candidates who name you as a Referee.

## Disclosure of your information

#### *Candidates:*

We may share your information with selected prospective employers to assist you with securing a job. Meritus Associates will never disclose personal information without your permission and will only do so as outlined in this Privacy Policy

## *Clients:*

We will only share your data when instructed by you to ensure that we provide you with suitable and relevant candidates

## *Suppliers:*

We may share your information with associated third parties with whom we do business with, unless you specify otherwise.

## Our Legitimate Business Interest (Why we process Personal Data)

Meritus Associates is an employment business that provides headhunting services and such, our legal basis for the processing of personal data is our legitimate business interest. We also rely on contract, legal obligation and consent for specific uses of data.

We introduce candidates to clients for permanent employment, fixed term and temporary contracts as well as independent contracts. As such, the exchange of personal data of our candidates and clients is an integral and essential part of this process.

In order to be able to provide our clients and candidates with efficient and effective service and support, we maintain a database of client and candidate personal data containing current and historical staffing requirements. This database is also required by Meritus Associates to maintain, expand and develop our business.

We will always ensure the way we process your personal data is balanced and that your fundamental rights of privacy are not outweighed by our legitimate interests.

## How we use your Personal Data

We may use your personal information to:

- send you items that you request from us
- supply you with services that you have requested
- send you statements and invoices, and collect payments for services that we have provided
- respond to enquiries and complaints made by you.

We will not disclose your personal information to any third parties for direct marketing purposes.

## Other reasons why we may disclose your Personal Data

We may also be required to disclose your Personal Data for the following reasons:

- if we are required to do so by law
- in connection with any current or prospective legal proceedings
- in order to protect our legal rights
- for fraud prevention purposes and reducing credit risk
- if we are selling or exploring the sale of any of our business assets.

## Retaining Personal Data

We will retain your personal data no longer than deemed necessary to provide our services to you and to satisfy any legal, accounting, regulatory or reporting requirements. How long we retain your information will depend on the services we perform for you and how long you require these from us. We often work with candidates for many years with multiple placements or potentially throughout their careers in which case we will retain information as an ongoing purpose.

We do the following to try to ensure that our data is accurate:

- we check that we have accurate information about you before making an introduction
- we encourage you to let us know of changes to your personal data
- we make use of external online sources such as LinkedIn to verify information about you.

Meritus Associates uses the following criteria to determine the need for retaining your personal data:

- the nature of the personal data
- accuracy of the data
- our legal obligations
- where Meritus Associates has been actively providing you with our services.

## Where we store your personal data

All information you provide to us is stored on our secure servers. We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. 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 us electronically; 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.

Meritus Associates currently only operates from the UK. If we open overseas offices (or provide services to clients overseas), the data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). For example, to Clients, Candidates or third parties who provide us with support services. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, support services. By submitting your Personal Data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## Your rights

We will not use your data for marketing purposes nor will we disclose your information to any third party for such purposes. The Act gives you the right to access information held about you. Upon receipt of your written request and enough information to permit us to identify your Personal Data, we will disclose to you the Personal Data we hold about you. We will also correct, amend or anonymise any Personal Data that is inaccurate and notify any third party recipients of the necessary changes. Any access request in providing you with details of the information we hold about you will be dealt with by us without charge and within a period of 14 days.

Please note that any requests to anonymise Personal Data are subject to any applicable legal and ethical reporting or document retention obligations imposed by us.

## Changes to our privacy policy

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

## Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to the Managing Director at [enquiries@meritusassociates.co.uk](mailto:enquiries@meritusassociates.co.uk) or by post to Meritus Associates, 1-2 Broadgate Circle, 2<sup>nd</sup> Floor, London EC2M 2QS.