

GDPR - Privacy Notice

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GDPR - Privacy Notice

1. Introduction

- 1.1.1. This Privacy Notice sets out how Estates Strategy Group Ltd (ESG) uses and protects any information that you give ESG when you use this website or provide information through other means.
- 1.1.2. ESG is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.
- 1.1.3. ESG may change this notice from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from **25th May 2018**.
- 1.1.4. ESG is registered with the Information Commissioner reference number **A8341343** refers.

2. Legal Considerations

- 2.1.1. On May 25th, 2018 the EU General Data Protection Regulation¹, commonly known as GDPR, comes into effect replacing the Data Protection Act that has been in place since 1998. The GDPR is Europe's new framework for data protection laws – it replaces the [previous 1995 data protection directive](#), which current UK law is based upon.
- 2.1.2. In the [full text of GDPR](#) there are 99 articles setting out the rights of individuals and obligations placed on organisations covered by the regulation. These include allowing people to have easier access to the data companies hold about them, a new fines regime and a clear responsibility for organisations to obtain the consent of people they collect
- 2.1.3. Under the terms of GDPR, employers may need to provide more information on data processes, such as how long personal data will be stored for, as well as be required by law to report any data breaches within 72 hours of occurrence.
- 2.1.4. The GDPR requires personal data to be processed in a manner that ensures its security.
- 2.1.5. This legislation will replace current data privacy law, giving more rights to you as an individual and more obligations to organisations holding your personal data.
- 2.1.6. One of the rights is a right to be informed, which means we have to give you even more information than we do now about the way in which we use, share and store your personal information.

3. Managing and Processing Information

3.1. What we collect from our website

- 3.1.1. We may collect the following information:
 - name and job title
 - contact information including telephone number and email address

¹ <https://www.eugdpr.org/>

- demographic information such as postcode, preferences and interests
- other information relevant to customer enquiries concerning products and services

3.2. Google Analytics

3.2.1. We use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

3.3. What we do with the information we gather

3.3.1. We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping
- We may use the information to improve our products and services
- We may periodically send promotional emails about new products or services, special offers or other information which we think you may find interesting using the email address or premises address which you have provided
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, telephone, fax or mail. We may use the information to customise the website according to your interests

3.4. Security

3.4.1. We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

3.5. How we use cookies

3.5.1. A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

3.5.2. We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

3.5.3. Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share

with us.

- 3.5.4. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

3.6. Links to other websites

- 3.6.1. Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

3.7. Controlling your personal information

- 3.7.1. You may choose to restrict the collection or use of your personal information in the following ways:
- whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes
 - if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at ESG-info@estatestrategygroup.com.
- 3.7.2. We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.
- 3.7.3. You may request details of personal information which we hold about you under the Data Protection Act 1998. If you would like a copy of the information held on you please write to Estates Strategy Group Ltd, Alphabeta Building, 18 Finsbury Square, London, EC2A 1BR.
- 3.7.4. If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

3.8. People who make a complaint to us

- 3.8.1. When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.
- 3.8.2. We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.
- 3.8.3. We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If

a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

- 3.8.4. We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.
- 3.8.5. Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

4. Job applicants, current and former ESG employees

- 4.1.1. ESG is the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information please contact us at ESG-info@estatestrategygroup.com.

4.2. What will we do with the information you provide to us?

- 4.2.1. All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.
- 4.2.2. We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.
- 4.2.3. We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

4.3. What information do we ask for, and why?

- 4.3.1. We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.
- 4.3.2. The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it might affect your application if you don't.

4.4. Application stage

- 4.4.1. If you use our online application system, this will be collected by a data processor on our behalf.
- 4.4.2. We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our recruitment team will have access to all of this information.
- 4.4.3. You will also be asked to provide equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment team, including hiring managers, in a way which can identify you. Any information you do provide, will be used

only to produce and monitor equal opportunities statistics.

4.5. Shortlisting

- 4.5.1. Our hiring managers shortlist applications for interview. They will not be provided with your name or contact details or with your equal opportunities information if you have provided it.

4.6. Assessments

- 4.6.1. We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test, or we might take interview notes. This information is held by ESG.
- 4.6.2. If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of six months. If you say yes, we would proactively contact you should any further suitable vacancies arise.

4.7. Conditional offer

- 4.7.1. If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.
- 4.7.2. You will therefore be required to provide:
- Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
 - Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.
 - You will be asked to complete a criminal records declaration to declare any unspent convictions.
 - If successful at interview you will be required to evidence your suitability for the role by obtaining and showing our nominated recruitment officer personal information to pass employment requirements e.g. immigration and obtain and show a recent record of a DBS (Disclosure and Barring Service). No copies of these documents will be made but an employment checklist will be completed confirming suitability or otherwise based on this information.
 - We will contact your referees, using the details you provide in your application, directly to obtain references.
 - We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work.

4.8. Final Offer

- 4.8.1. If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments
- Emergency contact details – so we know who to contact in case you have an emergency at work
- We will send the relevant statutory information to enable you to be a member of the company's pension scheme

4.9. Post start date

- 4.9.1. Some contracts with our clients may require a higher level of security clearance for roles – this will be clear on the advert. If this is the case, then you will be asked to submit information via the relevant agency. The agency will be the data controller for this information.
- 4.9.2. Our Code of Ethics and Conduct policy sets out the requirements and standards for our staff and we may ask for information in support of this and ask all staff to make certain declarations and sign a confidentiality agreement. If you complete a declaration, the information will be held securely in your personnel file.

5. Use of data processors

- 5.1.1. Data processors are third parties who we may instruct to provide elements of our recruitment and HR service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

5.2. Personal Records

- 5.2.1. If you accept a final offer from us, some of your personnel records will be held on our personnel databases which is an internally used HR records system.

5.3. How long is the information retained for?

- 5.3.1. If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment. This includes your criminal records declaration, fitness to work, records of any security checks and references.
- 5.3.2. If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the campaign.
- 5.3.3. Information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the campaign.
- 5.3.4. Equal opportunities information is retained for 6 months following the closure of the campaign whether you are successful or not.

5.4. Your rights

- 5.4.1. Under the Data Protection Act 1998, you have rights as an individual which you can exercise in relation to the information we hold about you.

- 5.4.2. You can read more about these rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

5.5. Access to personal information

- 5.5.1. ESG tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998 by email to ESG-info@estatestrategygroup.com. If we do hold information about you, we will:
- give you a description of it;
 - tell you why we are holding it;
 - tell you who it could be disclosed to; and
 - let you have a copy of the information in an intelligible form.
- 5.5.2. To make a request to ESG for any personal information we may hold, you need to put the request in writing to our head office at Estates Strategy Group Ltd, Alphabeta Building, 18 Finsbury Square, London, EC2A 1BR.
- 5.5.3. If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.
- 5.5.4. If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting ESG over the telephone or in writing.

5.6. Disclosure of personal information

- 5.6.1. In many circumstances we will not disclose personal data without consent. However, when we investigate a complaint, for example, we will need to share personal information with the organisation concerned and with other relevant bodies.
- 5.6.2. You can also get further information on:
- agreements we have with other organisations for sharing information;
 - circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;
 - our instructions to staff on how to collect, use and delete personal data; and
 - how we check that the information we hold is accurate and up to date.