



## **Sorbet Recruitment LTD Privacy Notice**

Sorbet Recruitment Limited (Sorbet) will be what is known as the 'Controller' of the personal data you provide to us. The Sorbet registration number is 11550557 and our registered address is Watergate Building, Crane Wharf, New Crane Street, Chester, CH1 4JE.

Sorbet is committed to protecting and respecting your privacy. This notice sets out the basis on which any personal data we collect from you, or that you provide us, will be processed by us.

### **Who we are and what we do**

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Business Regulations 2013. We collect personal data from the following types of people to allow us to undertake our business:

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

### **Types of Data We Collect**

In order to provide the best possible employment opportunities that are tailored to our candidates, we need to process certain information. We only ask for details that will genuinely help us to help candidates find a new role, such as name, contact details, education details, employment history and immigration status (and other relevant information you may choose to share).

Where appropriate, and in accordance with local laws and requirements, we may also collect information related to diversity, security clearance status or details of any criminal convictions.

If you are a Sorbet client, we need to collect and use information about you, or individuals at your organisation, in the course of providing you with our recruitment services. This can include finding candidates to fill your roles, providing you with Recruitment Process Outsourcing (RPO) services or notifying you of content published by Sorbet which may be relevant to you.

Sorbet will also store information relating to previous dealings with us, including job applications, email and telephone communications, job interviews and placements.

We collect a limited amount of data from the users of our website which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the most popular referrers and website responsiveness.

### **Where we obtain your information**

We may obtain candidate information from any number of locations:

- When you register with our website or apply for jobs via our website
- When you correspond with us by phone, email or otherwise
- When you visit our website
- When you register your CV on a job board and it matches the skills we're looking for
- When you apply for one of our jobs via a job board
- When you are referred by a friend / colleague
- Your online public profiles and CV databases

When we obtain your information from external sources such as LinkedIn, corporate websites and job boards we will inform you, by sending you this privacy notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from, and for what purpose we intend to retain and process your personal data.

There are two main ways in which we collect client data:

- Directly from you
- From third parties such as candidates, online job boards, LinkedIn and networking.

### **Data Retention**

We will delete candidate personal data from our systems if we have not had any meaningful contact with you for seven years (or for such longer period as we believe, in good faith, that the law or relevant regulators require us to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

We will consider there to be meaningful contact with you if you submit your updated CV onto our website, apply for jobs with us or we receive an updated CV from a job board. We will also consider it meaningful contact if you communicate with us about potential roles, either by verbal or written communication or engage with any of our marketing communications.

Under new data protection regulations (GDPR), we are required to keep the data we hold accurate and, where necessary, up to date. As such, we will make an effort to regularly communicate with you to ensure your data is up to date and accurate.

Whilst we will endeavour to permanently erase your personal data once it reaches the end of its retention period or where we receive a valid request from you to do so, some of your data may still exist within an archive system. While certain details may still exist on an archive system, this cannot be readily accessed by any of our operational systems, processes or staff.

For a list of all data categories and retention periods, please contact [info@sorbetreruitment.com](mailto:info@sorbetreruitment.com)

### **Legal Basis for Processing**

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract 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.

We will rely on legal obligation if we are legally required to hold information on to you to fulfil our legal obligations.

We will, in some circumstances, rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate).

### **Legitimate Interests**

Here at Sorbet, we take your privacy seriously and will only use your personal information to administer your account and to provide you with our recruitment services.

We think it's reasonable to expect that, if you are looking for employment or have posted your professional CV information on a job board or professional networking site, you are happy for us to collect and otherwise use your personal data to provide our recruitment services to you, share that information with prospective employers (with your consent) and assess your skills against our live vacancies. During the job offer process, your potential employer may also want to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with the law. We need to do these things so that we can help you find the job you deserve.

We want to provide you with tailored job alerts to help you on your job hunt. We therefore think it's reasonable for us to process your data to make sure that we send you the most appropriate jobs.

We may also need to use your data for our internal administrative activities, like payroll and invoicing where relevant.

### **Data Storage and Processing**

All of the personal data we hold about you will be processed by our staff in the United Kingdom, and accessed by our cloud-based CRM system (UK data centre). We take all reasonable steps to ensure that your personal data is processed securely and prevent unauthorised access to, and misuse of your personal data.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

### **Who do we share your data with?**

As required under GDPR, we will only share your information to prospective employers with your express consent.

Unless you specify otherwise, we may also share your information with associated third parties such as our service providers where we feel this will help us to provide you with the best possible service and we have the appropriate processing agreement in place.

### **Data Subject Access Requests**

You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. If you wish to access your data at any time, there will be no administration charge (unless the request is excessive) and the request should be fulfilled within 30 days. To make such a request, please email [info@sorbetrecruitment.com](mailto:info@sorbetrecruitment.com)

**Marketing Consent**

From time to time we would like to send you details of reports, promotions, offers, networking and client events and general information about the industry sectors which we think might be of interest to you.

**Changes to our privacy notice**

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

**Contact**

Questions, comments or requests regarding this privacy notice are welcomed and should be addressed to [info@sorbetrecruitment.com](mailto:info@sorbetrecruitment.com)