

Privacy policy for Frazer-Nash's Associates database



WHO WE ARE

Frazer-Nash Consultancy Ltd ("Frazer-Nash", "we", "us", "our") collects, uses and is responsible for certain personal information about you. When we do so, we are subject to European and UK laws on data protection ("Data Protection Law").

WHAT IS THE PURPOSE OF THIS POLICY?

Frazer-Nash regularly engages the services of third party contractors ("Associates") to perform services in connection with client projects. To this end, we maintain a database of the curriculum vitae of prospective Associates, these are individuals who are not engaged on a current project but whose CV may be of interest for future work ("Associates Database")

This Policy will apply to you if we hold your CV on our Associates Database. Please read it carefully before deciding whether or not to consent to your CV being held by us.

TERMINOLOGY USED IN THIS POLICY

When we refer to "**personal information**" in this Policy, we mean any information about an individual which can be used to identify that individual.

When we refer to "**special category personal information**" in this Policy, we mean types of personal information which require a higher level of protection, for example, information revealing racial or ethnic origin, political opinions or religious beliefs.

For the purposes of Data Protection Law, we are a "**data controller**". This means that we are responsible for deciding how we hold and use personal information about you.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

We will collect, store and use the following categories of personal information about you:

- information contained in your curriculum vitae or company summary (including any "special category" personal information contained therein)

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

The information may be provided to us directly by you. In addition, we may collect personal information about you through third party agencies and websites e.g. Jobsite, LinkedIn, Monster etc. or from personal recommendation where your CV has been passed to us by someone that you know.

HOW WE USE INFORMATION ABOUT YOU

We will use the personal information we collect about you to:

- consider whether you may be qualified for a work requirement which we are looking to meet, now or in the future
- communicate with you about work opportunities, now or in the future.

We believe that it is in our legitimate business interests to hold this information for a limited period. However, in addition, we have sought your consent to us holding this personal information about you for the purposes set out in this Policy.

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We will not disclose your personal information to any third party unless are formally engaged by us to provide services as an Associate. In all cases we will contact you regarding our intentions and will seek your permission before we send anything to anyone. If you do proceed to become an Associate, we will send you a separate Privacy Policy which will detail how your personal data may be used.

KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures in place to prevent your personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to know it. Those processing your personal information will only do so in an authorised manner and are subject to a duty of confidentiality. In the event that we become aware of an actual or suspected data security breach, we will promptly take all necessary steps to address such breach.

HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

Unless you instruct us otherwise, we will hold your CV on our Associates Database for a period of 3 years from the date on which we first received your CV. On the expiry of this 3 year period, we will contact you again to request your consent to your CV remaining on our Associates Database. You have the right to contact us at any time in order to request the removal of your CV from our Associates Database.

TRANSFERRING DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA (“EEA”)

We will not transfer your personal data outside the EEA unless we have discussed it with you and have received your permission to do so.

YOUR RIGHTS AND RESPONSIBILITIES

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes or the experience that you list on your CV needs to be updated.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes (although the only time when we would use your CV for direct marketing purposes would be after we had contacted you about our intention and you had given us your permission).
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party, please contact us.

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Fees not usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you if you make a data subject access request

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

RIGHT TO WITHDRAW CONSENT

You have the right to withdraw your consent to your CV being held on our Associates Database. To withdraw your consent, please contact us. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

HOW TO CONTACT US

If you have any questions about this Policy or how we handle your personal information, please contact the Head of Human Resources & Administration using the following email address datamanagement@fnc.co.uk.

In the event you have a complaint relating to our handling of your personal information, you also have the right to lodge a complaint with the UK Information Commissioner.

CHANGES TO THIS POLICY

We reserve the right to update this Policy at any time, and we will provide you with a new policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information