



# Career Seekers Direct Ltd

## Privacy Notices Policy

### What is this Privacy Notices Policy?

We have produced this policy to clearly outline when we may collect your personal information and what we do with it.

### Who we are?

Career Seekers Direct Ltd (11116187) provide career and skills services to a range of clients.

### Our responsibilities

As part of our work, we process and store personal data on customers, students, schools, suppliers, our own staff and sub-contractors of CSD. We take our data protection responsibilities seriously and ensure that the personal data that we obtain is held, used, transferred and processed in accordance with the applicable data protection laws.

### Basis of data processing

#### Personal data

“Personal data” is any information that relates to you. It can also include expressions of opinions about an individual. CSD lawfully processes your personal data under the following circumstances:

- Processing is necessary for the purposes of the legitimate interests.
- In respect of delivering Careers services, processing is necessary for the performance of a task carried out in the public interest.

#### Special category personal data

We may only process special category personal data in the following circumstances where, in addition to one of the above a lawful bases for processing, there exists one of the following grounds:

- Explicit consent – where you have given explicit consent.
- Not for profit bodies – the processing is carried out during the legitimate activities of a not-for-profit body and only relates to members or related persons and the personal data is not disclosed outside that body without consent.
- Public information – the processing relates to personal data which is manifestly made public by you.



## **Legitimate interest (our basis for processing data)**

Under the UK GDPR CSD considers that the legal basis for processing your personal data, for the purposes of careers support to our clients via our work with schools and local councils is legitimate interest.

The processing of personal data is therefore necessary to allow us to achieve this goal. However, we always ensure that we balance these objectives against your rights and freedoms of the individual, by reviewing our activities regularly for compliance with our ethical and legal obligations

If you do not agree with us processing personal data in this way, then you can request that CSD removes your information and does not process your data for careers supported activities. If this is the case, please consider the below sections on your [rights](#) and [how to contact us](#).

## **Public interest**

We may disclose limited personal data to a variety of recipients including:

- our representatives where there is a legitimate reason for their receiving the information
- internal and external auditors. those with an interest in tracking client's progress and attendance, including:
- government departments and agencies where we have a statutory obligation to provide information, for example, the Home Office (in connection with UK visas and immigration), Council Tax and Electoral Registration Officers at relevant local authorities (for the purpose of assessing liability for Council Tax and for electoral registration purposes)
- crime prevention or detection agencies (e.g. the police, the Department for Work and Pensions and Trading Standards);
- parents, guardians, and next-of-kin (where there is a legitimate reason for disclosure);
- third parties conducting surveys, for example the National Learner Survey.

We will only share your personal information with other people e.g. parents or carers, or with agencies such as the Benefits Department with your permission, or unless we have a statutory obligation to do so.

## **What personal data we collect**



The personal data we store and process, the majority of which is given to us by you, your school, parents, government bodies, may include:

- website usage data
- company information e.g. financial, staff, training needs analysis
- your name, and contact information such as address, email address and telephone number, as well as your date of birth, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality, birth certificate number and information about your next of kin, financial information i.e. bank details
- information relating to your education and employment history, the school(s), sixth form college(s) and other colleges or universities you have attended and places where you have worked, the courses you have completed, dates of study, examination results and any learning support which you may have received
- We will also keep records relating to assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your learner record
- information about your family or personal circumstances, and both academic and extracurricular interests, to provide you with appropriate pastoral care
- sensitive personal data and information about criminal convictions and offences, information concerning your health and medical conditions (e.g. disability and dietary needs); information about criminal convictions you may have
- information about your sex, disability, racial or ethnic origin; religion or similar beliefs; and sexual orientation

## **How we use your data**

Unless you have requested otherwise, your data is accessible to CSD and its sub-contractors and processed for a full range of careers support purposes.

- to meet our legal and statutory duties and responsibilities
- to process applications, enrolments and workforce development programmes and contracts
- for our own internal records so that we can provide you with a high-quality service
- to contact you in response to a specific enquiry
- to customise our services so they work better for you
- to contact you about services, products, offers and other opportunities provided by us which we think may be relevant to you



- to contact you via e-mail, telephone or mail for research purposes
- to be shared with other organisations for education, training, employment and well-being related purposes, including for research

At no time will we assume your permission to use information that you provide for anything other than the reasons stated here.

## **How we protect your data**

A key principle of the UK GDPR is that CSD processes your personal data securely by means of ‘appropriate technical and organisational measures’ – this is the ‘security principle’. To ensure full compliance CSD carries out detailed risk analysis of the data we will be processing.

## **Security**

Your data is held securely on a database hosted on a cloud based secure server. We also follow stringent procedures to ensure we work with all personal data in line with the GDPR.

## **Pseudonymisation**

Where appropriate, we also take measures such as pseudonymisation to ensure data cannot be used to identify you and/or encryption to ensure that the data cannot be accessed without the right security accesses and codes.

## **Restoration**

We also have measures to enable data to be restored and accessed in a timely manner in the event of a physical or technical incident.

We also ensure that we have appropriate processes in place to test the effectiveness of our security measures.

## **How long we will keep the data**

One of the principles in UK GDPR is that personal data should be kept for no longer than is necessary for the purposes for which the personal data are processed (except in certain specific and limited instances). We have a records retention policy that staff will not generally hold data locally, so personal data is always on our secure systems as well as defining what records should be held, by whom they should be accessed and when they should be securely disposed of.



## How to contact us:

We hope that our Data Controller (DC) can resolve any query, concern or complaint you raise about our use of your personal data on the contact details below:

[Eva@careerseekersdirect.co.uk](mailto:Eva@careerseekersdirect.co.uk)