



Privacy Notice

This notice explains what personal data (information) we will hold about you, how we collect it, how we will use and will share information about you, and how you can check and update any of your personal information.

We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

1. Who collects the information

"Ecogen Partners", a Ltd Company of 1a Davyhulme Circle, Davyhulme, Greater Manchester, United Kingdom, M41 0ST is a 'data controller' and this means that we are responsible for deciding how we hold and use personal information about you. We are an employment agency and employment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 and we collect personal data to allow us to undertake our business.

2. Who this notice applies too

This notice applies to any users of Ecogen Partners Ltd or its affiliates services anywhere in the world, including any users of Ecogen Partners Ltd or its affiliates website. It also applies to anyone who contacts or otherwise submits information to Ecogen Partners Ltd or its affiliates.

3. Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Retained for only as long as necessary for the purposes we have told you about.
6. Retained securely.



4. About the information we collect and hold

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

5. What information do we collect

We may collect the following categories of information:

- Name, address, email, telephone number, gender, date of birth, NI number, social media identifier, payroll data
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information
- Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references
- Information regarding your academic and professional qualifications
- We will collect sensitive personal information when required by our clients but we will inform you what we will do with this information on a case by case basis
- For candidates working at specific clients we carry out background checks, including criminal background and credit checks.
- We will collect other data, from time to time, to help us provide you with improved services, for example we survey candidates and clients in order to improve our services.

5. How we collect the information

We will collect this information about employees, workers, contractors and clients generally through the application and recruitment process, either directly from candidates or sometimes through referees (details of whom will have been provided), education provider, and relevant professional body, the Disclosure and Barring Service (DBS) and the Home Office.



This also includes information collected when you:

- We collect information about how you interact with our website, through the use of cookies, web beacons and similar technologies that create and maintain unique identifiers.
- Submit your personal details via the “Register Your CV” function on Ecogen Partners Ltd’s website.
- Submit your personal details including Linked In url via the job search function
- Consent to a background check (where permitted by law)
- Contact Ecogen Partners Ltd by email
- Submittal of further details to Ecogen Partners Ltd for onboarding purposes
- Make available your information on publicly available sources such as LinkedIn

7. Why we collect the information and how we use it

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- to take steps to enter into a contract;
- for compliance with a legal obligation; and
- for the purposes of our legitimate interests, but only if these are not overridden by your interests, rights or freedoms.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

The main purposes for which we may process personal information are

- to offer recruitment solutions to our clients and job seekers
- check whether you are legally entitled to work in the UK
- paying PAYE temporary employees and contractors
- Administering any contract we may enter into with you or with a company run by you
- Making arrangements for the termination of our working relationship
- Dealing with legal disputes
- Complying with health and safety obligations



- To prevent fraud and the facilitation of tax evasion
- To ensure network and information security
- To conduct surveys with both candidates and clients

Many of the above grounds for processing will overlap and there may be several rounds which justify our use of your personal information. If we reasonably consider that we need to use personal data for another reason and that reason is compatible with the original purpose, then we may do so. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. More detailed information is set out at Appendix A below.

When you use our website to apply for a role or to send us your CV we may ask you for your personal data. If you are seeking our assistance in finding you a suitable role we may ask you for your job search criteria, experience, salary expectations together with any other info we mutually believe to be relevant. We will enter this information on your candidate profile on our internal database to facilitate consultants sending you appropriate alerts or keeping you informed of roles that meet with your skillset. You can contact us at any time to request a copy of the information we hold or to ask for it to be removed.

Client and Suppliers

If you are a current or potential business to business contact, we will collect information about individuals in your organisation. This information may be entered into our database as a point of contact and will be visible to users of the database. Typically we will collect an individual's name and business contact details in relation to the provision of our services, including on a speculative basis.

We may obtain these details through the organisations HR, direct contact, referral, websites, social media, publications and other sources. An individual may email paul@ecogenpartners.com to request removal from the database.

8. How we share the information

We will share some of the above categories of personal information with other parties, such as clients in order to successfully place candidates into new roles. The recipient of the information will be bound by confidentiality obligations and will have their own operational and legal obligations to meet with regards



to the processing of personal data. We may also be required to share some personal information with our regulators or as required to comply with the law. We will also share data at your request. Our clients may ask for additional data as is relevant to their requirements.

We may transfer your data outside the EU (where one of our clients is located in a different country) but if we do so you can expect a similar degree of protection in respect of your personal information. Where applicable, we ensure contractual clauses are in place between either controller or processor and/or the recipient of the personal data in the third country or international organisation that have been authorised by a competent supervisory authority.

9. Sensitive personal information and criminal records information

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have identified two circumstances where we may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations.

We may only use information relating to criminal convictions where the law allows us to do so. We envisage that we will hold information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of the recruitment process.

10. Where information is stored

Information will be stored at the offices of Ecogen Partners Ltd and third party agencies, service providers, representatives and agents as described above.



11. Automated Decision-Making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not use automated decision-making in the course of our business.

12. How long we keep your information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep personal information will depend on whether we are successful in placing you with a client and the nature of the information concerned.

Different laws require us to keep different data for different periods of time. The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation. We have built our retention policy around these regulations and with our customers in mind.

If there is a clear business reason for keeping recruitment records for a significant period of time, we will do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

13. Your rights to correct and access your information and to ask for it to be erased

Please contact Paul Evans at Ecogen Partners Ltd at paul@ecogenpartners.com or if you would like to correct or request access to information that we hold relating to you or if you have questions about this notice. You also have the right to ask for some but not all of the information we hold and process to be



erased (the 'right to be forgotten') in certain circumstances. We will provide you with further information about the right to be forgotten, if you ask for it.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information. This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

14. Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

15. How to complain

We hope that we can resolve any query or concern you raise about our use of your information you can contact Paul Evans at Ecogen Partners at paul@ecogenpartners.com

If we are unable to resolve your concerns, please contact the Information Commissioner at <https://ico.org.uk/concerns/> for further information about your rights and how to make a formal complaint.

16. Document Management

This document is valid as of 01/04/2021

The owner of this document is the Privacy Officer, who must check and, if necessary, update the document at least once a year.

When evaluating the effectiveness and adequacy of this document, the following criteria need to be considered:



- Current suitability for purpose and legislative conformity against the EU GDPR 2016/679 (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC)

[Paul Evans]

[Managing Director – Ecogen Partners Ltd]