Artemis Recruitment Consultants Ltd
11 Grosvenor Hill
Mayfair
London
W1K 3QA
Tel: 0203 978 4888
www.artemisrecruitment.co.uk

ARTEMIS RECRUITMENT CONSULTANTS LTD
PRIVACY, DATA RETENTION & PROTECTION POLICY
25-07-2025

1. DEFINITIONS AND INTERPRETATIONS

1.1 **"Criminal records data"** means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings.

1.2 **"Data protection laws"** means all applicable laws relating to the processing of personal data, including, for the period during which it is in force, the UK General Data Protection Regulation.

1.3 **"Data subject"** means the individual to whom the personal data relates.

1.4 **"Personal data"** means any information that relates to an individual who can be identified from that information.

1.5 **"Processing"** means any use that is made of data, including collecting, storing, amending, disclosing, or destroying it.

1.6 **"Special categories of personal data"** means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data.

1.7 **"We/Us/Our"** means reference to Artemis Recruitment Consultants Ltd, a limited company registered in England under Company Number 9843254, whose registered address is 11 Grosvenor Hill, Mayfair, London, W1K 3QA

1.8 **"Our site"** means this website, https://www.artemisrecruitment.co.uk

1.9 **"Our services"** means any engagement with Artemis Recruitment Consultants Ltd to secure an individual with employed, whether that be on a temporary or permanent basis

2. INFORMATION ABOUT US

2.1 Our Site, https://www.artemisrecruitment.co.uk, is owned and operated by Artemis Recruitment Consultants Ltd, a limited company registered in England under Company Number 9843254 , whose registered address is 11 Grosvenor Hill, Mayfair, London, W1K 3QA.

2.2 Our data protection representative is Samantha Bambridge, who can be contacted at sam@artemisrecruitment.co.uk

3. STATEMENT AND PURPOSE OF POLICY

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3.1 Artemis Recruitment Consultants Ltd is committed to ensuring that all personal data handled by us will be processed according to legally compliant standards of data protection and data security.

3.2 The purpose of this Policy is to help us achieve our data protection and data security aims by:

- notifying individuals of whom we work with of personal information that we may hold about them, and what we do with that information;
- setting out the rules on data protection and the legal conditions that must be satisfied when we collect, receive, handle, process, transfer and store personal data and ensuring staff understand our rules and the legal standards; and
- clarifying the responsibilities and duties of staff in respect of data protection and data security.

4. WHAT PERSONAL DATA AND ACTIVITIES ARE COVERED BY THIS POLICY?

4.1 This Policy covers personal data:

5. which relates to a natural living individual who can be identified either from that information in isolation or by reading it together with other information we possess;

- is stored electronically or on paper in a filing system;
- in the form of statements of opinion as well as facts;
- which relates to Staff (present, past or future), candidates, clients or to any other individual whose personal data we handle or control;

6. which we obtain, is provided to us, which we hold or store, organise, disclose or transfer, amend, retrieve, use, handle, process, transport or destroy.

6.1 This personal data is subject to the legal safeguards set out in the data protection laws.

7. DATA PROTECTION PRINCIPLES

7.1 Under GDPR, all personal data obtained and held by the Company must be processed and comply with this Policy, which requires that personal information is:

- **processed lawfully, fairly and in a transparent manner.** We must always have a lawful basis to process personal data, as set out in the data protection laws. Personal data may be processed as necessary to perform a contract with the data subject, to comply with a legal obligation which the data controller is the subject of, or for the legitimate interest of the data controller or the party to whom the data is disclosed. The data subject must be told who controls the information (us), the purpose(s) for which we are processing the information and to whom it may be disclosed.

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- **collected only for specified, explicit and legitimate purposes.** Personal data must not be collected for one purpose and then used for another. If we want to change the way we use personal data, we must first tell the data subject.
- **processed only where it is adequate, relevant and limited to what is necessary for the purposes of processing.** We will only collect personal data to the extent required for the specific purpose notified to the data subject.
- **kept only for the period necessary for processing.** Information will not be kept longer than it is needed and we will take all reasonable steps to delete information when we no longer need it.
- **secure, and appropriate measures are adopted by the Company to ensure as such.**

8. WHAT PERSONAL DATA DO WE COLLECT AND HOW?

8.1.1 We will collect personal data about you which may include some of the following (please note this is not an exhaustive list):

- Personal details such as your name;
- Address and contact details, including email address and telephone numbers
- Date of birth;
- Gender;
- Education details;
- Employment history;
- Right to Work in the UK;
- Nationality/citizenship/place of birth;
- Start date or availability date:
- A copy of your driving licence and/or passport and/or identity card;
- Financial information (where we need to carry out financial background checks);
- Details about your previous and current remuneration, pensions and benefits arrangements;
- Information gathered via the recruitment process such as that entered into a CV or included in a CV cover letter

8.1.2 Information will be and can be obtained from the following sources:

- Directly from you
- From an employment agency
- From your current or previous employer
- From referees
- From third party sources, such as job boards or our website.

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9. HOW WE USE YOUR PERSONAL DATA

10. We will tell you the reasons for processing your personal data, how we use such information and the legal basis for processing in our Privacy Notice.

10.1 In general, we will use information to carry out our business, to administer your employment or engagement and to deal with any problems or concerns you may have.

11. You have the following rights in relation to the personal data we hold on you;

- the right to be informed about the data we hold on you and what we do with it;
- the right of access to the data we hold on you.
- the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- the right to have data deleted in certain circumstances. This is also known as 'erasure';
- the right to restrict the processing of the data;
- the right to transfer the data we hold on you to another party. This is also known as 'portability';
- the right to object to the inclusion of any information;
- the right to regulate any automated decision-making and profiling of personal data.

12.INDIVIDUAL RIGHTS

12.1 Subject access requests: You have the right to make a subject access request. If you make a subject access request, we will tell you:

- whether or not your personal data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from you;
- to whom your personal data is or may be disclosed.
- for how long your personal data is stored (or how that period is decided);
- your rights of rectification or erasure of data, or to restrict or object to processing;
- your right to right to complain to the Information Commissioner if you think we have failed to comply with your data protection rights; and
- whether or not we carry out automated decision-making and the logic involved in any such decision making.

13. We will provide you with a copy of the personal data undergoing processing. This will normally be in electronic form if you have made a request electronically, unless you agree otherwise.
14. To make a subject access request, contact us at sam@artemisrecruitment.co.uk.

14.1 We may need to ask for proof of identification before your request can be processed. We will let you know if we need to verify your identity and the documents we require.

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14.2 We will normally respond to your request within 28 days from the date your request is received. In some cases, e.g. where there is a large amount of personal data being processed, we may respond within 3 months of the date your request is received. We will write to you within 28 days of receiving your original request if this is the case.

15. If your request is manifestly unfounded or excessive, we are not obliged to comply with it.

16. THIRD PARTY PROCESSING

16.1 Where we engage third parties to process data on our behalf, we will ensure, via a data processing agreement with the third party, that the third party takes such measures in order to maintain the Company's commitment to protecting data.

17. ACCURACY AND RELEVANCE

17.1 We will:

- ensure that any personal data processed is up to date, accurate, adequate, relevant and not excessive, given the purpose for which it was collected.
- not process personal data obtained for one purpose for any other purpose, unless you agree to this or reasonably expect this.

17.2 If you consider that any information held about you is inaccurate or out of date, then you should tell the Data Protection Officer. If they agree that the information is inaccurate or out of date, then they will correct it promptly. If they do not agree with the correction, then they will note your comments.

18.DATA SECURITY

18.1 We will use appropriate technical and organisational measures to keep personal data secure, and in particular to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.

18.2 Maintaining data security means making sure that:

- only people who are authorised to use the information can access it;
- where possible, personal data is pseudonymised or encrypted;
- information is accurate and suitable for the purpose for which it is processed; and
- authorised persons can access information if they need it for authorised purposes.

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18.3 By law, we must use procedures and technology to secure personal information throughout the period that we hold or control it, from obtaining to destroying the information.

18.4 Personal information must not be transferred to any person to process (e.g. while performing services for us on or our behalf), unless that person has either agreed to comply with our data security procedures or we are satisfied that other adequate measures exist.

18.5 Security procedures include:

- Any desk or cupboard containing confidential information must be kept locked.
- Computers should be locked with a strong password that is changed regularly or shut down when they are left unattended and discretion should be used when viewing personal information on a monitor to ensure that it is not visible to others.
- Data stored on CDs or memory sticks must be encrypted or password-protected and locked away securely when they are not being used.
- The Data Protection Officer must approve of any cloud used to store data.
- Data should never be saved directly to mobile devices such as laptops, tablets or smartphones.
- All servers containing sensitive personal data must be approved and protected by security software.
- Servers containing personal data must be kept in a secure location, away from general office space.
- Data should be regularly backed up in line with the Company's back-up procedure.

18.6 Telephone precautions. Particular care must be taken by Staff who deal with telephone enquiries to avoid inappropriate disclosures. In particular:

- the identity of any telephone caller must be verified before any personal information is disclosed;
- if the caller's identity cannot be verified satisfactorily then they should be asked to put their query in writing;
- do not allow callers to bully you into disclosing information. In case of any problems or uncertainty, contact the Data Protection Officer.

18.7 Methods of disposal. Copies of personal information, whether on paper or on any physical storage device, must be physically destroyed when they are no longer needed. Paper documents should be shredded and CDs or memory sticks or similar must be rendered permanently unreadable.

18.8 Additional measures to ensure data security include:

- client confidentiality is must and must not be discussed outside the office environment.

19.INDIVIDUAL RESPONSIBILITIES

19.1 Staff are responsible for helping the Company keep all personal data up to date.

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19.2 Employees have access to the personal data of our clients and candidates via the Company's secure online database. The Employer will rely on their Staff members to help meet its data protection obligations to Staff and to customers.

19.3 Individuals who have access to personal data are required:

- to access only personal data that they have authority to access and only for authorised purposes;
- not to disclose personal data except to individuals (whether inside or outside of the Employer) who have appropriate authorisation;
- to keep personal data secure (e.g. by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
- not to remove personal data, or devices containing or that can be used to access personal data, from the Employer's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device; and
- not to store personal data on local drives or on personal devices that are used for work purposes.

20.REQUIREMENT TO NOTIFY BREACHES

20.1 All data breaches are recorded internally and, where legally required, will be reported to the Information Commissioner within the appropriate time of discovery. In addition, where legally required, we will inform the individual whose data was subject to breach,

21.TRAINING

21.1 We will provide training to all individuals about their data protection responsibilities as part of the induction process and at regular intervals thereafter. All new employees must read, understand and agree to the data protection policy before representing Artemis Recruitment Consultants Ltd.

21.2 Individuals whose roles require regular access to personal data, or who are responsible for implementing this Policy or responding to subject access requests under this Policy will receive additional training to help them understand their duties and how to comply with them.

21.3 All employees who use the computer database system are trained to help protect individuals' private data and to ensure data security. Our employees understand the consequences to the Company and themselves if there are any potential breaches of the Company's policies and procedures.

22.HOW TO COMPLAIN

22.1 If you have any concerns about our use of your personal data, you can make a complaint to us using the following contact details:

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11 Grosvenor Hill, Mayfair, London, W1K 3QA

Phone: 020397 84888

Alternatively, you can send an email to: sam@artemisrecruitment.co.uk

23. If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO. Full details can be found either on their website (https://www.ico.org.uk/make-a-complaint) or using the information below:

    The Information Commissioner's Office

    Phone: 0303 123 1113

    Email: casework@ico.org.uk

    Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Further information regarding your rights can be found on the ICO Website.

This policy has been approved and authorised by:

Name: Samantha Bambridge
Position: Managing Director
Date: 23rd February 2025
Signature: *S.Bambridge*