

PRIVACY NOTICE

INTRODUCTION

This privacy notice provides you with details of how we collect and process your personal data.

We are NQ Recruitment Ltd (trading as NQSolicitors.com) a company registered in England and Wales (company number 09829178). We are the data controller and are responsible for your personal data.

Our email address is info@nqsolicitors.com

Our postal address is 25 Southampton Buildings, London, England, WC2A 1AL.

As we are not a public body, and DO NOT carry out large-scale monitoring of individuals, we are not required to appoint a Data Protection Officer. However, we have appointed **Ian Roberts as our 'Privacy Manager'**.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at info@nqsolicitors.com

This notice applies across all websites that we own and operate and all services we provide, including our online and mobile recruitment service, and any other apps or services we may offer (for example, events or training). For the purpose of this notice, we'll just call them our 'services'.

When we say 'personal data' we mean identifiable information about you, like your name, email, address, telephone number and company.

We may need to update this notice from time to time. Where a change is significant, we'll make sure we let you know by sending you an email.

SUMMARY OF CHANGES

This Privacy Policy was last updated on 21st May 2018. Here is a summary of the changes we made then.

Wording:	We've tried to write this policy in plain English and have avoided the use of legal jargon wherever possible.
Collection & Use:	We've provided more information about the ways we collect personal data about you, who we collect that data from, and how we intend to use it.
Sharing:	We've been more prescriptive about who we share your personal data with and why.
Data & IT Security:	We've restated our commitment to protecting your personal data using appropriate technical and organisational measures.
Data Subject Rights:	We've set out in more detail all rights individuals have in relation to their personal data and how those rights can be exercised.

HOW WE COLLECT YOUR DATA

Information we collect from public sources:

The majority of information we collect, we collect directly from you, however, in order to make you aware of our service in the first place, we collect basic data from public sources.

We **DO NOT** collect any of this data from third party suppliers in the form of marketing or research companies and we **DO NOT** buy any of this data.

Here is a list of the data fields we collect from public sources:

- Your name
- The name of the company you work for
- Your job title
- Your work email address
- Your date (or expected date) of qualification as a Solicitor

The Lawful Basis up which we process this data is '**Legitimate Interests**'.

When coming to this decision, we have carefully considered, not just the General Data Protection Regulations (GDPR) and the associated guidelines as set out by the Information Commissioner's Office, but we have also paid very close attention to our responsibilities as set out by the Privacy and Electronic Communications Regulations (PECR).

We have undertaken the following tasks:

- Identified a relevant legitimate interest
- Checked that there is no less intrusive and viable way to achieve the same result
- Confirmed that, in the event of a data breach, the basic data we hold would have a minimal privacy impact and would not cause you any unjustified harm

We have also conducted a legitimate interests assessment by closely studying previous email marketing campaigns and recording the associated email open rates, opt-out rates and account activation rates. We will continue to monitor these rates going forward and will reassess whether 'Legitimate Interest' remains the most appropriate lawful basis for processing this data.

Information you provide to us directly:

When you activate an account on our website, whether as a Candidate or as a Hirer, we will ask you to provide further data, which will help us to perform our recruitment service.

If you don't want to provide us with personal data, you don't have to, but it might mean you can't use some parts of our websites or services.

Candidates:*1. When activating a Candidate account:*

We will ask you to confirm your name and to provide a telephone number and an email address. We **DO NOT** ask Candidates to provide mobile telephone numbers and personal email addresses, but the vast majority of Candidates prefer to do so.

The Lawful Basis upon which we process this data is **'Consent'**.

2. When completing a Candidate profile:

We will ask you to complete multiple fields relating to your academic record, your legal experience to date and whether you speak additional languages.

We will also ask you to tell us what your work preferences are.

At this stage you will have the option to upload a CV to the platform. We **DO NOT** insist that Candidates upload a CV in order to create a 'live' profile, but many choose to do so at this stage. If you do upload a CV to the platform (at any stage of the recruitment process), then it may contain other personal data which we will hold on record for the purposes of delivering our recruitment service.

The Lawful Basis upon which we process this data is **'Consent'**.

3. When you are interviewing or interacting with Hirers with whom you have been matched:

In order to deliver our service effectively we will need to keep notes regarding your interaction with Hirers during the recruitment process. This may include:

- the dates upon which you will be or have attended interviews;
- any feedback that either you or the Hirer provide to us following an interview;
- details of any offer of employment that you may receive from a Hirer, and
- any other information relating to the recruitment process that either you or the Hirer may provide.

When we are asked to upload Candidate CVs to a Hirer's recruitment portal, it is often the case that the Hirer will ask certain questions in relation to, among other things, a Candidate's race or ethnicity, religious or philosophical beliefs, sexual orientation and general health, all of which are clarified as 'Sensitive Data'.

We **DO NOT** collect Sensitive Data about you as a matter of course and ask Hirers if we can decline to answer any or all of these questions on your behalf. However, it may be the case that we need to collect this Sensitive Data from you, in which case we will require your signature in order to process this Sensitive Data.

The Lawful Basis upon which we process this data is **'Legitimate Interests'**.

Hirers:*1. When activating a Hirer account:*

We will ask you to confirm your name and the name of the company you work for and will also ask you to provide a telephone number and an email address. We **DO NOT** ask Hirers to provide mobile telephone numbers (although some choose to) and insist that the email address provided by Hirers is associated with the company that they work for.

The Lawful Basis upon which we process this data is '**Consent**'.

2. When running searches for Candidates:

We will ask you to complete three fields relating to a specific vacancy regarding the location, the practice area and the salary on offer, and you will have the option to insert various candidate filters when searching for matches.

The Lawful Basis upon which we process this data is '**Consent**'.

3. When you are interviewing or interacting with Candidates with whom you have been matched:

In order to deliver our service effectively we will need to keep notes regarding your interaction with Candidates during the recruitment process. This may include:

- the dates upon which Candidates will be or have attended interviews;
- any feedback that either you or the Candidate provide to us following an interview;
- details of any offer of employment that you may make to a Candidate, and
- any other information relating to the recruitment process that either you or the Candidate may provide.

The Lawful Basis upon which we process this data is '**Legitimate Interests**'.

4. Upon placement of a Candidate:

Once we have agreed to place a Candidate with you, we may need further information in order to send you an invoice and to collect payment.

The Lawful Basis upon which we process this data is '**Legal Obligation**'.

Information we collect automatically:

We collect some information about you automatically when you visit our websites or use our services, like your IP address and device type. We also collect information when you navigate through our websites and services, including what pages you looked at and what links you clicked on. This information is useful for us as it helps us get a better understanding of how you're using our websites and services so that we can continue to provide the best service possible.

Some of this information is collected using cookies and similar tracking technologies. If you want to find out more about the types of cookies we use, why, and how you can control them, take a look at our [cookies policy](#).

HOW WE USE YOUR DATA

We use your personal data to operate our websites, to provide you with our recruitment services, and to manage our relationship with you. We also use your personal data for other purposes, which may include the following:

1. To communicate with you. This may include:

- providing you with information you've requested from us (like CVs and job specifications) or information we are required to send to you;
- operational communications, like changes to our websites and services, security updates, or assistance with using our websites and services;
- marketing communications (specifically about our websites and recruitment services);
- when asking you for either Candidate or Hirer testimony or when asking you to take part in any research that we are conducting.

2. To support you:

- This may include assisting with the resolution of technical support issues or other issues relating to our websites or recruitment services.

3. To enhance our websites and recruitment services and to develop new ones:

- For example, by tracking and monitoring your use of our websites and recruitment service so we can keep improving, or by carrying out technical analysis of our websites and services so that we can optimise your experience during the recruitment process.

4. To conduct research and to produce reports on market trends:

- We may use the personal data we collect about you and other users of our websites and recruitment services to produce aggregated and anonymised analytics and reports, which we may share publicly or with third parties.

HOW & WHY WE MAY SHARE YOUR DATA

There will be times when we need to share your personal data with third parties. We will only disclose your personal data to:

- other companies in the NQ Recruitment group of companies;
- carefully selected third-party service providers who assist and enable us to use the personal data to either support the delivery of our recruitment services, or to market or promote our services to you;
- regulators, law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights. Where possible and appropriate, we will notify you of this type of disclosure;
- an actual or potential buyer (and its agents and advisers) in connection with an actual or proposed purchase, merger or acquisition of any part of our business;
- other people where we have your consent.

INTERNATIONAL DATA TRANSFERS

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Some of our third-party service providers are based outside of the EEA, so their processing of your personal data will involve a transfer of data outside of the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- Where we use providers based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

If none of the above safeguards are available, we may request your explicit consent for the specific transfer. You will have the right to withdraw this consent at any time.

DATA SECURITY

Security of your personal data is a priority for us and we have put in place appropriate security measures to prevent your personal data from being accidentally lost, disclosed or altered. We also have security measures in place to stop your personal data from being accessed or used in an unauthorised way. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including contact, identity, financial and transaction data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

It's your personal data and you have rights under data protection laws relating to it.

When it comes to marketing communications, you can opt out of receiving these at any time – just follow the unsubscribe instructions contained in the marketing communication or send your request to info@nqsolicitors.com

You also have rights to:

- know what personal data we hold about you, and to make sure it's correct and up to date;
- request a copy of your personal data, or ask us to restrict processing your personal data or delete it;
- object to our continued processing of your personal data.

You can exercise these rights at any time by sending an email to info@nqsolicitors.com

You can see more about your rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you're not happy with how we are processing your personal data, please let us know by sending an email to info@nqsolicitors.com. We will review and investigate your complaint and try our best to get back to you within a reasonable time frame.

You can also complain to your local data protection authority who will be able to advise you how to submit a complaint.