

Privacy Notice

WINCHESTER CONSULTING LIMITED ("we" and "us") are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please note that where you are a student we may also collect or be provided with your personal data from your academic or training institution where it is acting on your behalf. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of data protection law (including the Data Protection Act 2018), the data controller is Winchester Consulting Limited (Company number 04210584) incorporated in England and Wales whose registered office is at 82 Wandsworth Bridge Road, London, SW6 2TF. We are registered with the Information Commissioner's Office with registration number ZA240786. Our contact details are set out at the bottom of this notice.

We operate the TRS and Talentview platforms (the applicable platform is referred to in this policy as "our site") which provides a vacancy database service whereby prospective employees may place their details on our site for viewing by prospective employers, employment agencies and businesses who subscribe to the service ("employers"). Where an employer contacts you by clicking a box against your data and, our site will automatically generate an email from the employer to you (or your academic or training institution), to which you (or your academic or training institution) may respond or not at your discretion. We maintain a database of the data provided by employers and employees who register with us under our CRM database ("CRM").

Information we may collect from you

We may collect and process the following data about you:

- Information that you provide by filling in the registration form on our site. This includes personal information such as your name, postal and email addresses, telephone number, date of birth, qualifications, skills and experience, job category and other information provided at the time of registering to use our site and information which you update (which you may do at any time by re-accessing your registration form).
- Information contained in any CV which is uploaded to our site by you or your academic or training institution on your behalf.
- Information which is uploaded to the site or otherwise provided to us by your academic or training institution.
- Record of emails automatically generated by our site when an employer clicks against your data to contact you; record of job offers made and whether accepted or declined.
- If you contact us, we keep a record of your calls, emails and correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

- Details of your visits to our site including, but not limited to, IP addresses, weblogs, location data, and other communication data and the resources that you access. This includes information collected using cookies (please see the “IP addresses and cookies” section below).

We need certain information to provide our services (such as your name and contact details), if you do not provide this information, we may not be able to provide you with our services. Mandatory information fields will be set out as part of our registration form.

If you work for one of our suppliers or business partners, your employer may provide us with information about you as relevant to our relationship with them. This may include your contact information and details of your position within the organisation.

Uses made of the information

We may (if relevant) use information held about you in the following ways:

- To provide you or (where relevant) your academic or training institution with the services afforded by our site by making your data available to employers and if required automatic generation of emails from employers contacting you.
- To record for our internal management purposes transactional information.
- To provide reports and information to academic or training institutions for whom we provide services including but not limited to reports on targets and employment sector retentions, employee and vacancy categories and offers of employment and acceptances.
- To provide you or (where relevant) your academic or training institution with information on our services including redeployment support, CV assistance, job search advice, interview and skills training and other employment related advice; whilst these services are generally provided as part of the services we offer in conjunction with your registration to use our site, you may notify us that you do not wish to receive information on these services in writing or by email to our address below or by amending your notification settings in your account.
- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To comply with any legal requirements for us to maintain certain records or carry out certain checks, and/or for our legitimate interests in preventing fraud, dealing with a complaint or enquiry and administering your (or your organisation's or academic or training institution's) relationship with us and any services we offer, as well as to review and improve our offerings, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To notify you or (where relevant) your academic or training institution acting on your behalf about changes to our service.
- To provide (where relevant) reports and information to the Construction Industry Training Board (CITB) to enable CITB to fulfil its functions (and purposes incidental to those functions) as set out in the Industrial Training Act 1982 and for purposes connected with CITB's role as an Industrial Training Board.
- To provide reports and information to enterprise partnerships, public or combined authorities and government funded bodies for whom we provide services including but not limited to reports on targets and employment sector retentions, data on employees, registrations on our site, employee and vacancy categories and offers of employment and acceptances.

- To provide (where relevant) reports and information (including about your use of the platform and your profile on the platform) to local authorities and academic or training institutions (whether you are a member of those institutions or not) in order for them to fulfil their functions (and purposes incidental to those functions) as set out in their privacy notices in order for them to monitor and support student job-seeking and work experience opportunities, and (where relevant) to verify your link with that academic or training institution.

If you are acting as an individual, we do not use your data for direct marketing or other marketing purposes or pass your data to any third parties for marketing purposes (unless we have your “opt-in” consent to do so). If you are a company or LLP (or are acting in a professional capacity as part of one) we use your contact details as necessary for our legitimate interests in marketing to you (by various channels) and maintaining a list of potential customers.

Generally, we use your information as necessary for us to perform any contract we have entered into with you or your academic or training institution, and as necessary for our (or a third party’s) legitimate interests (provided your rights and interests do not override those interests). Examples of those legitimate interests are set out in the list above. In some circumstances we may also use your information on the basis of your consent, in which case you can withdraw that consent at any time.

We will only use your personal information for the purposes for which we collected it as set out in this notice, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. 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.

Note about CVs

If your CV includes personal data in a reference, you must ensure that the individuals who are being asked to provide a reference are aware that you have forwarded their details and they have consented for you to do so.

Your CV may be accessed by users of our site and we are unable to control how they use the information contained in your CV. We advise that you do not include the following sensitive information in your CV. If you do include this information, then you agree that it is at your own risk:

- Age or date of birth
- Racial or ethnic origin.
- Political beliefs.
- Philosophical or religious beliefs.
- Membership of a trade union or political party.
- Physical or mental health or biometric details or genetic makeup.
- Addictions or sexual life.
- Sexual orientation.
- The commission of criminal offences or proceedings and associated penalties or fines.
- The commission of any unlawful or objectionable conduct and associated penalties.
- National Insurance Number.

- Full home address.

IP addresses and cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for our system administration. We use this as statistical data about our users' browsing actions and patterns, and do not use it to identify any individual.

For the same reason, we may obtain information about your general usage of our site by using a cookie file which is stored on your device. Cookies contain information that is transferred to your device. They help us to improve and to deliver a better and more personalised service. They enable us:

- To estimate our user size and usage pattern.
- To store information about your individual interest in jobs and our services.
- To speed up your searches.
- To recognise you when you return to our site.

For detailed information on the cookies on our site and the purposes which they are used for see our Cookie Notice.

Other than “strictly necessary” cookies (which are needed to provide our site or functionality on our site which you request) no cookies are stored on your device unless you have actively consented to them.

Where we store your personal data

All information you provide to us is stored on our secure servers in the United Kingdom.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

When you register with us you will be given a password to enable you to access our site. You are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Where we pass personal data to academic or training institutions or third party public or industry bodies (such as local authorities) we will transfer data to their hosting and other service providers. This data will then be managed by those third parties as controllers in their own right. You can find more information about how they use your personal data in their privacy notices.

Disclosure of your information

We may disclose your personal information to any member of our group, which means our subsidiaries and (if relevant) our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may disclose your personal information to third parties:

- With third-party service providers (such as hosting providers and IT providers). All our third-party service providers are required to take appropriate security measures to protect your

personal information and are not permitted to use it outside of the purposes of providing their services.

- In the event that we sell or buy any business or assets, in which case we may pass your personal data to the prospective seller or buyer of such business or assets if necessary as part of that transaction for our or their legitimate interests (in which case your data will continue to be used in the same way for the same purposes). You will be notified of any such transfer, and if you object to the transfer or the continued use of your data, you can exercise your right to object (detailed below).
- If Winchester Consulting Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its clients and users will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation agreements; or to protect the rights, property, or safety of Winchester Consulting Limited, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

As part of our service, you or (where relevant) your academic or training institution acting on your behalf can also choose to make your information available through our site to potential employers. This is only done at your request, and you can choose the sectors in which your information is available to employers.

How long we keep your information

You may cancel your registration with us at any time by accessing your data on our site and selecting the delete option or by notifying us by email or in writing or using your settings in your account and we will withdraw your data from our site. We will however need to take steps to verify your identity when you do this. Your data may however be retained (including in anonymised form) on our CRM for statistical reporting purposes to enterprise partnerships, public or combined authorities or other UK government funded bodies for whom we provide services. We will retain your information for as long as is necessary in relation to those purposes. This will generally be a period of up to 7 years after your information is removed from our site.

In relation to information which was not provided for storage or display on our site, We retain this information for as long as is necessary in relation to the purposes for which it was collected or provided. This will generally be a period of up to 7 years after the relevant issue or matter is completed and our relationship with you or your organisation has ended.

We retain your information for this period in part because it is necessary for our legitimate interests in ensuring that we can properly bring or defend legal claims if relevant.

In some circumstances, it may be necessary to keep your information for longer in order to satisfying any legal, accounting, or reporting requirements or due to technical requirements.

Third parties

Our site may, from time to time, contain links to and from the websites of partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Your rights

Data protection law gives you a number of rights when it comes to personal information we hold about you. The key rights are set out below. More information about your rights can be obtained from the Information Commissioner's Office (ICO). Under certain circumstances, by law you have the right to:

- **Be informed** in a clear, transparent and easily understandable way about how we use your personal information and about your rights. This is why we are providing you with the information in this notice. If you require any further information about how we use your personal information, please let us know.
- **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 (for instance, we may need to continue using your personal data to comply with our legal obligations). 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 us using your information on this basis and we do not have a compelling legitimate basis for doing so which overrides your rights, interests and freedoms (for instance, we may need it to defend a legal claim).
- **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 where you provided it to us and we are using it based on your consent, or to carry out a contract with you, and we process it using automated means.
- **Withdraw consent.** In the limited circumstances where we are relying on your consent (as opposed to the other bases set out above) to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. 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 compelling legitimate interest in doing so.
- **Lodge a complaint.** If you think that we are using your information in a way which breaches data protection law, you have the right to lodge a complaint with your national data protection supervisory authority (if you are in the UK, this will be the ICO).

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

No fee 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. We may need to request specific information from you to help us understand the nature of your request, to 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. If we request any identification from you for this purpose, it is on the basis that it is necessary to comply with our legal obligations, and we will only keep and use this until your identity has been verified.

Timescale. Please consider your request responsibly before submitting it. We will respond to your request as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will let you know.

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Winchester Consulting Limited, 82 Wandsworth Bridge Road, London, SW6 2TF or sent by email to us at contact@wincon.co.uk