

1. Introduction

This privacy notice provides you with details of how we collect and process personal data through the use of our website www.smart-resourcing-solutions.com (the “**Website**”) and/or through the delivery of our products and/or services.

The Website is not intended for children and we do not knowingly collect data relating to children.

Smart Resourcing Solutions trading as SRS Recruitment and Employability Experts is the data controller and we are responsible for your personal data (referred to as “**we**”, “**us**” or “**our**” in this privacy notice).

A data controller, according to applicable data protection laws means a person who determines the purposes for which, and the manner in which, any personal data is to be processed. A data processor means any person (other than an employee of the data controller) who processes personal data on behalf of a data controller.

Where we are always a data controller: We are always a data controller in relation to the personal data that is collected from those who visit the Website, enquire about and purchase our products/services, or to whom we market our products/services (“**User(s)**”).

Where we are a data processor: We contract with businesses and education providers (our “**Customers**”) to provide them with our products and/or services. Through the performance of our obligations under these contracts, we will collect and process personal data belonging to their respective students, employees and/or prospective employees. The Customers are the data controllers under applicable data protection laws and we act as a data processor. If you are a student, employee or prospective employee of a Customer (a “**Candidate**”) and would like more information on how your personal data is collected and processed we suggest you contact them directly.

Where we may be a data controller: In some instances we may agree with a Customer that we shall both act as independent data controllers. This means both us and the Customer may separately determine the purposes for which, and the manner in which, a Candidate’s personal data is to be used. This privacy notice sets out how we process a Candidate’s personal data when we are a data controller. If you are a Candidate and you wish to know whether we are a data controller or data processor of your personal data please contact us using the contact details below.

Our full contact details are:

Full name of legal entity: Smart Resourcing Solutions Limited (Company Number 08486268) trading as SRS Recruitment and Employability Experts

Email address: enquiries@smart-resourcing-solutions.com

Postal address: Collingwood Buildings, 38 Collingwood Street, Newcastle Upon Tyne, England, NE1 1JF.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

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 enquiries@smart-resourcing-solutions.com.

2. What personal data do we collect about you

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may collect different kinds of personal data about Users and/or Candidates (together referred to as "**Individual(s)**").

We may collect and process certain types of personal data from Users as follows:

- **Identity and Contact Data** may include name, title, date of birth, gender, billing address, delivery address, email address and telephone numbers. We process this data for the purposes of communicating with a User. Our lawful ground for this processing is the performance of a contract and/or taking steps at the User's request to enter into such a contract.
- **Transaction Data** may include details about payments made to us and other details of purchases made by a User. Our lawful ground for this processing is the performance of a contract between the User and us.
- **Technical Data** may include data about the User's use of the Website and online services such as IP address, login data, browser details, length of visit to pages on the Website, page views and navigation paths, details about the number of times a User uses the

Website, time zone settings and other technology on the devices a User uses to access the Website. The source of this data is from our analytics tracking system. We process this data to analyse a User's use of the Website and other online services, to administer and protect our business and the Website, to deliver relevant website content and advertisements to Users and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer the Website and our business, to grow our business and to decide our marketing strategy.

- **Usage Data** may include information about how a User uses the Website, products and services. We process this data to operate the Website and ensure relevant content is provided to Users, to ensure the security of the Website, to maintain backups of the Website and/or databases and to enable publication and administration of the Website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer the Website and our business.
- **Marketing and Communications Data** may include a User's preferences in receiving marketing communications from us and our third parties and your communication preferences. We process this data to keep you up to date with our latest news, views and free resources. Our lawful ground for this processing is our legitimate interests to study how Users use our products/services, to develop them and grow our business.

We may use **Identity and Contact Data, Technical Data, Usage Data and Marketing Data** to deliver relevant website content and advertisements to Users (including LinkedIn adverts or other display advertisements) and to measure or understand the effectiveness of our advertising. Our lawful ground for this processing is legitimate interests which is to grow our business. We may also use such data to send other marketing communications to Users. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

We collect the following personal data from Candidates:

- **Identity and Contact Data** – this includes name, title, date of birth, gender, email address, personal home address and mobile number, as well as (if relevant) details about the university a Candidate attends, the years they attend and the particular course they study. Our lawful ground for this processing is the performance of a contract or taking steps at the Candidate's request to enter into such a contract.
- **Usage Data** – this includes the performance records generated by a Candidate during the provision of our products and/or services to a Customer. Our lawful ground for this processing is legitimate interest to study the effectiveness of our products/services, to develop them and to grow our business.
- **Marketing and Communications Data** – this includes marketing preferences. Our lawful ground for this processing is our legitimate interest to grow our business and to decide our marketing strategy.

Sensitive data

Sensitive data (referred to as Special Categories of Personal Data within data protection legislation) includes details about an Individual's race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about their health and genetic and biometric data.

So that we can improve the delivery of our services and/or the development of the services we offer we may, from time to time, request Individuals to provide us with Sensitive Data. Please note that we will not process Sensitive Data belonging to an Individual unless we have the Individual's explicit consent to do so.

3. How we collect your personal data

We collect personal data belonging to Users through a variety of different methods including:

- **Direct Interactions:** Users may provide data by filling in forms on the Website (or otherwise) or by communicating with us by post, phone, email or otherwise, including when a User:
 - Orders our products or services;
 - Subscribes to our service or publications;
 - Requests resources or marketing be sent to them;
 - Enters a survey; or
 - Gives us feedback

- **Automated Technologies or Interactions:** As a User uses the Website, we may automatically collect technical data about their equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies.

- **Third Parties or Publicly Available Sources:** We may receive data about a User from various third parties and public sources set out below.
 - Analytics providers such as Google based outside the EU;
 - Advertising networks such as LinkedIn based outside the EU;
 - Providers of technical, payment and delivery services; or
 - Identity and contact data from publicly available sources such as Companies House and the Electoral Register based inside the EU

We collect personal data belonging to Candidates through a variety of different methods including:

- **Direct Interactions:** Candidates may provide data by communicating with us in person, in

- writing, by phone, email, through the Website, or otherwise, including when a Candidate:
- Provides their personal data during our performance of our contract with the respective Customer;
 - Provides their personal data to us at any event we organise or attend (including virtual events);
 - Subscribes to our service or publications;
 - Requests resources or marketing be sent to them;
 - Enters a survey; or
 - Gives us feedback.
- **Directly from a Customer:** We collect a Candidate's personal data as it is provided to us by a Customer.
 - **Third Parties or Publicly Available Sources:** We may receive data about a Candidate from various third parties and public sources set out below.
 - Analytics providers such as Google based outside the EU;
 - Advertising networks such as LinkedIn based outside the EU;
 - Providers of technical, payment and delivery services; or
 - Identity and contact data from publicly available sources such as Companies House and the Electoral Register based inside the EU

4. How we use your personal data

Where we act as a data controller, we will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between you and us;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or if we request your Sensitive Data. You have the right to withdraw your consent at any time by emailing us at enquiries@smart-resourcing-solutions.com or, in relation to marketing communications, clicking the unsubscribe button on the bottom of our email messages.

We will only use personal data for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you would like an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

Where we act as a data processor, the Customer shall determine the lawful basis by which a Candidate's personal data is processed. Further clarity on the lawful basis used by a Customer

is likely to be found in the Customer's privacy policy or by contacting them directly. We collect and process personal data, on a Customer's behalf as a data processor, in accordance with the Customer instructions. The lawful bases that the Customer is likely to rely on are contract (where processing is necessary for the performance of its contract), "legitimate interests" and compliance with the Customer's legal obligations.

5. Marketing Communications

You will receive marketing communications from us if you have:

- Requested information from us or purchased goods or services from us; or
- If you provided us with your details when you registered for a free resource; and
- In each case, you have not opted out of receiving that marketing.

We will ask for consent before we share personal data with any outside company for marketing purposes. However, we do not currently share your personal data with any third party for their own marketing purposes.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing us at enquiries@smart-resourcing-solutions.com at any time.

If you opt out of receiving marketing communications, this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

6. Disclosures of your personal data

We may have to share personal data with the parties set out below:

- Other companies in our group who provide services to us;
- Service providers who provide IT and system administration services;
- Professional advisers including lawyers, bankers, auditors and insurers; and
- Government bodies that require us to report processing activities.

We require all third parties to whom we transfer personal data to respect the security of personal data and to treat it in accordance with the law. We only allow such third parties to process personal data for specified purposes and in accordance with our instructions.

7. International transfers

Many of our third party service providers are based outside the European Economic Area (EEA) so their processing of personal data will involve a transfer of data outside the EEA.

Whenever we transfer personal data out of the EEA, we ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

- We will only transfer personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data; 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.

If we use US-based providers we only transfer data to them if they have equivalent safeguards in place or if we have entered into a specific contract with them which has been approved by the European Commission.

If none of the above safeguards are available, we may request an Individual's explicit consent to the specific transfer. An Individual will have the right to withdraw this consent at any time.

8. Data security

We have put in place security measures to prevent an Individual's personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also only allow access to the personal data of Individuals to those employees and associates who have a business need to know such data. They will only process this personal data on our instructions, and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify the relevant Individual and any applicable regulator of a breach if we are legally required to.

Whilst we will strive to ensure the security of personal data, it must be acknowledged that no transfer of data can be guaranteed as 100% secure. We therefore require that all Individuals accept that:

- there are security and privacy limitations of the Internet which are beyond our control;
- the security, integrity and privacy of any and all information and data exchanged with us through the Website cannot be guaranteed and we shall have no liability (subject to any liability we cannot exclude or limit at law) to any party whatsoever for loss, misuse, disclosure or alteration of such information; and
- any such information and data may be viewed or tampered with in transit by a third party.

9. Data retention

We will only retain an Individual's personal data for as long as necessary to fulfil 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.

Details of our retention periods for personal data belonging to an Individual can be provided on request.

Where we are acting as a data processor, we shall only retain Candidate personal data for as long as necessary to fulfil the purpose we collected it. This is primarily to fulfil our contractual obligations to the Customer. We therefore retain such Candidate personal data for the period of time we are instructed to retain it by the relevant Customer.

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.

10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

You can see more about these rights by clicking [HERE](#).

If you wish to exercise any of the rights set out above, please email us at enquiries@smart-resourcing-solutions.com.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

11. Third-Party Links

The Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave the Website, we encourage you to read the privacy notice of every website you visit.

12. Cookies

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.