



STEN PARTNERS
PRIVACY STATEMENT

Privacy Statement

This privacy statement sets out how Sten Partners ("Sten", "The Company", "we", "us" or "our") uses and protects any information that you give The Company when you make contact with us and when you use our website. Sten Partners is a trading name of Blayze Consulting Group Limited through which the Company operates. The Company is committed to ensuring that your privacy is protected and complying with data protection legislation, which includes in particular the Data Protection Act 1998 (or its successor) and the General Data Protection Regulation (GDPR) (EU) 2016/679, ("GDPR"), (together the 'Data Protection Laws').

The Company is a recruitment consultancy offering a range of talent management and executive search functions in tandem with general recruitment work-finding services for both permanent and temporary candidates to suit our Clients varying needs. The Company must process **personal data** (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a **data controller**, for the purposes of the Data Protection Laws. The Company has registered with the ICO and its registration number is Z2589844.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

- How personally identifiable information of yours is collected from you through the website, job boards or other direct applications or emails.
- How the information is used by us.
- With whom the information may be shared and for what purpose(s)
- What choices are available to you regarding collection, use and distribution of the information?
- The kind of security procedures that are in place to protect the loss, misuse or alteration of information collected through our website
- How you can correct any inaccuracies in the information.

Information Collection and Use

We may collect the following information to help you in finding the right role:

- Name and job title, including any previous name or change of name;
- Contact information including phone number, email and postal address;
- Demographic information such as postcode, preferences and interests;
- Type of work you are seeking and your skills, qualifications and experience and salary package;

- For temporary workers we may collect bank account details and/or national insurance number so that we may pay you;
- Evidence of right to work, e.g. passport or visa documentation, which may include a photograph, nationality, place of birth and date of birth etc. (to meet statutory requirements);
- Other personal data where relevant to the role or required by the nature of the contract of employment, such as Date of Birth, National Insurance Number, membership of governing bodies;
- Other personal data contained in your curriculum vitae that you provide to us;
- For Clients and suppliers, we will collect information in relation to individuals within your organisation to enable us communicate with you / them to provide our services or to receive goods and services. We generally only process the individual's name and business contact information.

The Company may hold **personal data** on individuals for the following purposes:

- Staff administration;
- Advertising, marketing and public relations specific to the work and activities of The Company;
- Accounts and records;
- Administration and *processing* of work-seekers' *personal data* for the purposes of providing work-finding services, including *processing* using software solution providers and back office support;
- Administration and *processing* of clients' *personal data* for the purposes of supplying/introducing work-seekers;
- The kind of security procedures that are in place to protect the loss, misuse or alteration of information collected through our website

All such personal data will be used in the following circumstances:

- To fulfil a contract with you;
- Where it is in our legitimate interests;
- When it is our legal or regulatory duty;
- When you consent.

Registration

We request information from the user on our online registration forms. Here a user must provide contact information and information regarding the type of work you are seeking and your skills, qualifications and experience. This information is used to enable us to provide you with work-finding services and job alerts which our recruitment consultants may send matching your job search criteria and preferences or which they consider you may find interesting. If we have trouble processing your application, this contact information is used to get in touch with you. The Company does not use this information for any other purpose.

Sharing

We may share aggregated demographic information with our clients. This is not linked to any personal information that can identify any individual person.

The Company may disclose Personal Information to third parties. The disclosure to third parties would occur in the following circumstances:

1. We will disclose Personal Information to our clients where necessary and appropriate in connection with the provision of staffing services including permanent and temporary placements.
2. We may disclose Personal Information to companies and individuals we employ to perform business functions and services on our behalf. Such functions may include, for example, hosting our Web servers, analysing data, providing legal, accounting and marketing services.
3. We may disclose Personal Information to the extent necessary or appropriate to government agencies, advisers, and other third parties in order to comply with applicable laws, the service of legal process, or if we reasonably believe that such action is necessary to (a) comply with the law requiring such disclosure; (b) protect the rights or property of The Company; (c) prevent a crime or protect national security or (d) protect the personal safety of the users or the public.
4. As The Company works in international markets we may communicate your Personal Information to client companies within or outside the EU, who may use or process your Personal Information for the purposes described above. The data protection laws outside the EU may not provide an equivalent level of protection to those in the United Kingdom. The Company will abide by this Statement, as well as any applicable laws, when data is transferred. The Company will take steps to ensure that such recipients of data transfers are made aware of this Statement and act to preserve the confidentiality and security of your personal data.

The Company Cookie Policy

Information about our use of cookies

Cookies are small, often encrypted text files, located in browser directories. These cookies allow us to distinguish you from other users of our website, which help us provide you with a better experience when you browse our site. By continuing to use the site, you are agreeing to the use of our cookies.

We use the following cookies:

Strictly necessary cookies; these are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.

Analytical / Performance cookies; They allow us to recognise and count the number of visitors, to see how visitors move around our website, and when they are using it. This helps us to improve the way our website works, for example, by ensuring that users find what they are looking for.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

How to control or delete cookies

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. In order to do this, follow the instructions provided by your browser (usually located within the "Help", "Tools" or "Edit" facility). Disabling a cookie or category of cookie does not delete the cookie from your browser; you will need to do this yourself from within your browser. If you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Log Files

We use IP addresses to analyse trends, administer the site, track user's movement, and gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable data.

Links

This website contains links to other sites. Please be aware that The Company is not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by this website.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

This website takes every precaution to protect our users' information. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, The Company cannot guarantee the security of your data transmitted to our website, such transmission is at your own risk. When users submit sensitive information via the website, your information is protected both online and off-line. When our registration form asks users to enter sensitive information that information is encrypted and is protected with Secure email system. While on a secure page, you will note the https: designation to the left of the site location as opposed to un-locked, or open, when you are just

'surfing'. While we use encryption to protect sensitive information online, we also do everything in our power to protect user information off-line. All of our users' information, not just the sensitive information mentioned above, is restricted in our offices.

Data Retention

The Company will retain your personal data only for **as long as is necessary**. Different laws require us to keep different data for different periods of time.

The Conduct of Employment Agencies and Employment Businesses (Amendment) Regulations 2010, require us to keep work-seeker records where we take action 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**.

Where the Company has obtained your consent to process your personal and or sensitive personal data, we will do so in line with our retention policy of **5 years from the last date of communications for work seekers**. Upon expiry of that period your data will be deleted or the Company may seek further consent from you. Where consent is not granted the Company will cease to process your personal and or sensitive personal data.

Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Controlling your personal information

Where you have consented to the Company processing your personal and or sensitive personal data you have the right to withdraw that consent or you may choose to restrict the collection or use of your personal information by emailing us at **gdpr@blayzgroup.co.uk**.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above e-mail address. We will promptly correct any information found to be incorrect.

Notification of Changes

If we decide to change our privacy policy, we will post those changes on our Homepage so our users are always aware of what information we collect, how we use it, and under circumstances, if any, we disclose it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users by way of an email. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy under which the information was collected.

Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact the Operations Manager at Blayze Group, 2-4 Idol Lane, London, E3R 5DD. Ph: 0207 337 7500 or emailing [**gdpr@blayzegrp.co.uk**](mailto:gdpr@blayzegrp.co.uk).

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

Acceptance

By accepting our Terms & Conditions, and registering your information on our site or responding to our job adverts you authorise us to use your Personal Information to send you automated email messages or marketing materials regarding our services, including employment information. You may opt out of receiving such marketing email messages and manage your email preferences or unsubscribe at any time, at [**gdpr@blayzegrp.co.uk**](mailto:gdpr@blayzegrp.co.uk).

Please also see The Company **Data Protection and Information Security Policy**.