



## Privacy Notice

### Our Services

McKenzie Douglas Ltd are legal recruitment experts. Dedicated primarily to legal and commercial placements, we have a wealth of knowledge and experience covering all major global industry sectors.

### Brief Overview

Our primary business is the introduction of candidates to our clients. We represent a broad selection of individuals, including lawyers, contracts managers, IP professionals, company secretaries and compliance managers, placing candidates both on a permanent and locum basis.

The exchange of personal data of our candidates to our clients is a fundamental, essential part of this process. To enable us to provide an efficient service we require a database of candidates, this database contains some historical information as current resourcing requirements demand.

We therefore collect personal information from candidates where we have your consent to do so. Examples of this would be name, address and salary information.

Candidates are not introduced to clients without being firstly thoroughly vetted to ensure suitability and then secondly the candidate providing consent, either obtained orally or by submitting information through email or the MD website, which has written clauses outlining our data privacy policies that the candidate/client is deemed to agreed with prior to submission of the information.

Your data protection and privacy rights are of great importance to us. If at any time you wish to access your personal data held by us, you can do so by contacting our Data Protection and Privacy Manager on [mydata@mckenziedouglas.co.uk](mailto:mydata@mckenziedouglas.co.uk)

McKenzie Douglas Limited is a registered data controller, ICO number Z729764X. Our registered office address is The Coach House, Storrs Park, Bowness on Windermere, Cumbria, LA23 3JP.

### Full scope of business

#### Who do we connect with?

Day to day, to carry out our core business and ancillary activities, we collect the personal data of;

- Solicitors, lawyers, legal professionals and candidates in related sectors;
- Prospective and live client contacts in legal and related sectors;
- Supplier contacts to support our services;
- Employees, consultants, interim workers.

### Information you provide to us or we collect about you independently

This refers to information about you that you have given us, when you contact us, apply for a role, register with us, fill in forms on our website [www.mckenzie-douglas.co.uk](http://www.mckenzie-douglas.co.uk) or by communicating with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, to register onto our database, subscribe to our services, or other social media functions we as a firm may be linked to.

The information you provide to us, or we collect about you may include items such as your name, address, private and corporate e-mail address and phone number, financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

## **Information we collect about you when you visit our website.**

On each visit to our website we will automatically collect the following information:

Technical information, your internet domain name (this might be your internet service provider, for example, BT, Sky), and Internet protocol (IP) address used to connect your device to the internet, your login information (if applicable), browser type and version, (e.g. Microsoft Edge, Mozilla Firefox), your device type, time zone setting, browser plug-in types and versions, operating system (e.g. Windows 10) and platform.

Information about your visit, including [the full Uniform Resource Locators (URL),] clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.

## **Data processing and the legal basis for the processing**

We use information held about you in the following ways:

The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary or permanent engagement.

The legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on to you to fulfil our legal obligations.

To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.

We will in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate).

## **Our legitimate business interests**

Our legitimate interests in collecting and retaining your personal data is described below:

In order to support our candidates' career aspirations and our clients' resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements.

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment or temporary worker placements. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.

To maintain, expand and develop our business we also need to record the personal data of prospective candidates and client contacts.

## **Consent**

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

## **Automated decision making**

We do not undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

## **Disclosure of your information inside and outside of the EEA**

### **We will share your personal information with:**

Selected third parties including:

- Clients to introduce candidates to them;
- candidates to arrange interviews and engagements;
- clients, business partners, suppliers and sub-contractors to comply with the obligations of any contract we enter with them or you;

### **We will disclose your personal information to third parties:**

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply terms of use and other agreements; or to protect the rights, property, or safety of McKenzie Douglas Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### **The lawful basis for the third-party processing will include:**

- Their own legitimate business interests in processing your personal data, in most cases to fulfill their internal resourcing needs;

- satisfaction of their contractual obligations to us as our data processor;
- for the purpose of a contract in place or in contemplation;
- to fulfill their legal obligations.

## Where we store and process your personal data

The data that we collect from you may/will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may/will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

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.

## Retention of Personal Data

We acknowledge our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests. Accordingly, we regularly review data to remove information that we no longer have a legitimate business interest in maintaining.

To achieve this we undertake the following:

Prior to making an introduction we check that we have accurate information about you and we will keep in touch, so you can let us know of changes to your personal data.

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:

- the nature of the personal data;
- its perceived accuracy;
- our legal obligations;
- whether an interview or placement has been arranged; and
- our recruitment expertise and knowledge of the industry by country, sector and job role.

## Your rights under GDPR

### You can:

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. 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 processing on this ground. You also have the right

to object where we are processing your personal information for direct marketing purposes. 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 in certain formats, if practicable. Make a complaint to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

## Access to Information

The Data Protection Act 1998 and the GDPR give you the right to access information held about you. Your right of access can be exercised in accordance with the Act and GDPR. No fee will apply.

## Changes to our Privacy Notice

Any changes we make to our privacy notice in the future will be posted on our website. Please check back frequently to see any updates or changes to our privacy notice.

## Contacting Us

Any questions, comments or requests regarding this privacy notice should be addressed in the first instance to [mydata@mckenziedouglas.co.uk](mailto:mydata@mckenziedouglas.co.uk)

Dated; November 2020