

## PRIVACY AND DATA HANDLING POLICY

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Review Cycle	At least annually
Policy Author	Romilly Wakeling

#### Dunbar Education Privacy & Data Handling Policy

Dunbar Education understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, [www.dunbareducation.com](http://www.dunbareducation.com) (“Our Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

#### 1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

“Personal data” means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and

“We/Us/Our” means Dunbar Education a limited company registered in England under company number 09956190 whose registered address is 1 Widcombe Street, Poundbury, Dorchester, England, DT1 3BS and whose main trading address is Fourth Floor - Exchange House, 494 Midsummer Boulevard, Milton Keynes, Milton Keynes , MK9 2EA.

#### 2. Information About Us

2.1 Our Site is owned and operated by Dunbar Education Limited, a limited company registered in England under company number 09956190, whose registered address is 1 Widcombe Street, Poundbury, Dorchester, England, DT1 3BS and whose main trading address is Fourth Floor - Exchange House, 494 Midsummer Boulevard, Milton Keynes, Milton Keynes , MK9 2EA.

2.2 Our VAT number is 233190925

2.3 Our Data Protection Officer is Tristan Hehir, and can be contacted by email at [Tristan.Hehir@DunbarEducation.com](mailto:Tristan.Hehir@DunbarEducation.com) or by telephone on 0330 335 9914 or by post at Fourth Floor - Exchange House, 494 Midsummer Boulevard, Milton Keynes, Milton Keynes , MK9 2EA.

2.4 We are regulated by The Association of Professional Staffing Companies (APSCo) is the professional body representing the interests of recruitment organisations.

### 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

#### 3.1 The Data Protection Act

The [Data Protection Act 2018](#) controls how your personal information is used by organisations, businesses, or the government. The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

- Everyone responsible for using personal data must follow strict rules called 'data protection principles. They must make sure the information is:
- used fairly, lawfully, and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant, and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction, or damage

There is stronger legal protection for more sensitive information, such as:

- race
- ethnic background
- political opinions
- religious beliefs
- trade union membership
- genetics
- biometrics (where used for identification)
- health
- sex life or orientation

There are separate safeguards for personal data relating to criminal convictions and offences.

#### Your rights

- Under the Data Protection Act 2018, you have the right to find out what information the government and other organisations store about you. These include the right to:
- be informed about how your data is being used
- access personal data
- have incorrect data updated

- have data erased
- stop or restrict the processing of your data
- data portability (allowing you to get and reuse your data for different services)
- object to how your data is processed in certain circumstances

You also have rights when an organisation is using your personal data for:

- automated decision-making processes (without human involvement)
- profiling, for example to predict your behaviour or interests

#### 4. Your Rights

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

4.1.1 The right to be informed about Our collection and use of personal data;

4.1.2 The right of access to the personal data We hold about you (see section 12);

4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 13);

4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 13);

4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;

4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);

4.1.7 The right to object to Us using your personal data for particular purposes; and

4.1.8 Rights with respect to automated decision making and profiling.

4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 13 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

#### 5. What Data Do We Collect?

Depending upon your use of our site, we may collect some or all of the following personal and non-personal data:

5.1 name;

5.2 date of birth;

5.3 gender;

- 5.5 job title;
- 5.6 profession;
- 5.7 contact information such as email addresses and telephone numbers;
- 5.8 demographic information such as post code, preferences, and interests;

## 6. How Do We Use Your Data?

6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the Data Protection Act 2018 OR GDPR at all times. For more details on security see section 7, below.

6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, we may use your data for the following purposes:

6.2.1 Supplying Our products AND/OR services to you (please note that We require your personal data in order to enter into a contract with you);

6.2.2 Personalising and tailoring Our products AND/OR services for you;

6.2.3 Replying to emails from you;

6.2.4 Supplying you with emails that you have opted into - you may unsubscribe or opt-out at any time by clicking the unsubscribe link in our emails or by contacting our customer support team.

6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email AND/OR telephone AND/OR text message AND/OR post with information, news, and offers on Our products AND/OR services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

6.4 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

6.5 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

6.5.1

Dunbar Education Data Retention Policy

This Data Retention Policy is designed primarily to set out the limits that apply to the various types of data held by Dunbar Education, to establish the criteria by which those limits are set, and to set out how personal data should be deleted or disposed of.

Dunbar Education will keep some forms of information for longer periods than others. Information should not be kept indefinitely, unless there are specific requirements to do so. In line with Dunbar Education's Data Protection policy information should not be kept longer than is necessary. The table below gives a breakdown of timescales for the retention of various types of information and any legal or regulatory requirements applicable.

Section	Records Held (Type of Data)	Retention Timescale (in years)	Retention complies with
Personnel Records	Work-seeker records including application form/CV, ID Checks, terms of engagement, details of assignments, opt-out notices and interview notes	5 academic years from last engagement on contract	1 yr from last work - Conduct Regs
	Hirer records including client details, terms of business with clients	5 academic years from last engagement on contract	1 yr from last work - Conduct Regs
	Terms of engagement with temporary worker and terms of business with clients	5 academic years from last engagement on contract	6 yr – Limitation Act

	Annual appraisal/assessment records	2 years after employment contract has ended	DP – as long as necessary
	References	5 academic years from last engagement on contract	1 yr from last work - Conduct Regs
	Records held relating to right to work in the UK	5 academic years from last engagement on contract	1 yr from last work - Conduct Regs
	Criminal records checks/ Disclosure and Barring checks	5 academic years from last engagement on contract	1 yr from last work - Conduct Regs

	<p>National Minimum Wage documentation:</p> <ul style="list-style-type: none"> <li>• Total pay by the worker and the hours worked by the worker</li> <li>• Overtime/shift premia</li> <li>• Any deduction or payment of accommodation</li> <li>• Any absences e.g. rest breaks, sick leave, holiday</li> <li>• Any travel or training during working hours and its length</li> <li>• Total number of hours in a pay reference period</li> </ul>	3 years after the end of the pay reference period following the one that the records cover	HMRC (National Minimum Wage Act 1998)
	Sickness records – statutory sick pay	3 years after the end of the pay reference period following the one that the records cover	HMRC
	Statutory maternity, paternity, adoption pay	3 years from the end of the tax year to which it relates	HMRC
	Pensions auto-enrolment (including auto-enrolment date, joining date, opt in and opt out notices, contributions paid)	6 years except for opt out notices which should be kept for 4 years	HMRC
	Gender pay gap reporting	1 year (but the statement must be kept on the Government website for 3 years)	HMRC
C	VAT	6 years	HMRC
	Company accounts	6 years	HMRC



<ul style="list-style-type: none"> <li>• Payroll information</li> <li>• CIS records</li> </ul>	3 years from the end of the tax year	HMRC
ITEPA (the intermediaries legislation) records	No less than 3 years after the end of the tax year to which they relate	HMRC

### End of Retention Period

At the end of the retention period, or the life of a record, it should be reviewed and deleted where necessary. The Dunbar Education database flags for review, after a pre-determined period. These flags are sent to our IT department

### Changes to Policy

Dunbar Education keep this retention policy under regular review and as a result it may be amended from time to time without notice. If you have any questions in relation to this policy, please contact Romilly Wakeling, Managing Director of Dunbar Education on [romilly.wakeling@DunbarEducation.com](mailto:romilly.wakeling@DunbarEducation.com)

#### 7. How and Where Do We Store Your Data?

7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.

7.2 Your data will only be stored in the UK.

7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.

7.4 Steps We take to secure and protect your data include:

Data security is relevant to protect intellectual property rights, commercial interests, or to keep sensitive information safe.

Arrangements need to be proportionate to the nature of the data and the risks involved. Data that contain personal information will be treated with higher levels of security than data which do not, as the safeguarding of personal data is dictated by national legislation, the [Data Protection Act 2018](#), which states that personal data should only be accessible to authorised persons. Personal data can be stored in digital files or can exist in non-digital format: candidate records, signed consent forms, interview cover sheets containing names, addresses and signatures.

#### Security is made safer by:

- Separating data content according to security needs, e.g. store participant names and addresses separately from survey files
- Encrypting data containing personal information before they are stored or transmitted
- Attention to security is also important when data files are to be destroyed.

### Physical security

- Controlling access to buildings, rooms, cabinets where data, computers, media or hardcopy materials are held
- Logging the removal of, and access to, media or hardcopy material in storerooms
- Transporting sensitive data only under exceptional circumstances, even for repair purposes; for example, giving a failed hard drive containing sensitive data to a computer manufacturer may cause a breach of security

### Network security

- Not storing sensitive data such as those containing personal information on servers or computers connected to an external network, particularly servers that host internet services
- Firewall protection and security-related upgrades and patches to operating systems to avoid viruses and malicious code

### Security of computer systems and files

- Locking computer systems with a password
- Ensuring computer software is up-to-date
- Protecting servers by power surge protection systems through line-interactive uninterruptible power supply (UPS) systems
- Implementing password protection and controlled access to data files, for example 'no access', 'read only', 'read and write' or 'administrator-only' permission
- Controlling access to files, folders or entire hard drives encryption
- Not sending personal or confidential data via email or other file transfer means without first encrypting them
- Destroying data in a consistent manner when needed: deleting files and reformatting a hard drive *will not prevent* the possible recovery of data; consult our [guidance on data disposal](#)
- Imposing non-disclosure agreements for managers or users of confidential data

### Data security and cloud storage

Cloud data storage should not be used for high-risk information such as files that contain personal or sensitive information or that have a very high intellectual property or commercial value. While file encryption safeguards data files to a certain degree, it does not negate the requirements of the DPA.

Our secure FTP (SFTP) servers, secure content management systems set up and controlled by an institution or secure workspaces.

#### 8. Do We Share Your Data?

8.1 Subject to section 8.2, we will not share any of your data with any third parties for any purposes.

8.2 In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where We are involved in legal

proceedings, where We are complying with legal obligations, a court order, or a governmental authority.

## 9. What Happens If Our Business Changes Hands?

9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

9.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new owner or controller.

## 10. How Can You Control Your Data?

10.1 In addition to your rights under the GDPR, set out in section 4, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, we aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).

10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 11. Your Right to Withhold Information

You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

## 12. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and we will provide any and all information in response to your request free of charge. Please contact Us for more details using the contact details below in section 13.

## 13. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at [info@DunbarEducation.com](mailto:info@DunbarEducation.com), by telephone on 0330 335 9914 or by post at Fourth Floor - Exchange House, 494 Midsummer Boulevard, Milton Keynes, Milton Keynes , MK9 2EA. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you (as under section 12, above).

#### 14. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our site, and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date.