

PRIVACY POLICY

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1. General Statement

CCM Facilities Ltd the security and performance of our data handling systems and website through controls which are part of our Information Security Management System (ISMS); which complies with the requirements of ISO 27001.

We have carried out assessments of the legal basis for processing personal data and have concluded that we must hold data on the following grounds:

- Contractual and legal obligations.
- Legitimate interests between our clients and employee's data for our commercial and employment accountabilities.


Endorsed by; Dated: 01/06/2018
G Doherty, Managing Director:

2. How we use your information

2.1 This Privacy Policy tells you what to expect when we collect and process personal information. For professional personal data (e.g. business related data) the legal basis for this is our legitimate interests, namely the control and maintenance of our website' business administration, and the performance or creation of a contract between you and us. For employment related personal data, the legal basis for this is our legitimate interests, namely the protection and assertion of legal rights and/or the performance or creation of a contract between you and us as an employer and/or employment and fiscal legal obligations`

2.2 We will not store any of your information outside of the European Economic Area [EEA]

2.3 Should we decide to process any personal data for a purpose other than that for which it was collected, we will provide you with information on that other purpose and with any relevant further information prior to that further processing.

3. Visitors to our websites

3.1 When someone visits our website we collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website.

3.2 In order to provide you with our products and services, or to reply to any enquiries, we collect professional information (e.g. business related data) about you and your company submitted to our websites, passed on during telephone conversations, included in emails and mobile messaging and any other form of written or verbal communication. For example, we might keep a record of your name, work address and associated delivery addresses, work email address and work telephone number/s.

3.3 We also hold the IP addresses of visitors to the website.

- We will store this data for 6 months
- We have detailed below the 3rd parties we share your data with
- Where we want to collect personal data we will make this clear and will explain what we intend to do with it.

3.4 By continued use of our website, you consent to the Company collecting analytical and professional information about you and your organisation in accordance with the terms set out in this Policy. You also consent to the Company using the analytical and professional information for market research, marketing, sales, customer relationship management (CRM), operational, financial and legal purposes in accordance with the terms set out in this Policy.

4. Services

4.1 We offer various services to professionals. We have to hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes. For example, we might use information about people who have requested a service to carry out a survey to find out if they are happy with the level of service they received. When people do subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this.

5. Cookies

5.1 We may automatically log personal data or link information automatically logged by other means with personal data about specific individuals. However, we will only use this information to help us respond to queries you may have about our products or services or to tell you about other products and services that we think you may be interested in. We will not pass this information on to any third parties.

5.2 The Internet browser that you use may make use of a feature called a "cookie" to assign identification to your computer. We do not use cookies to store personal data or to link personal data to non-personal data, unless you have first agreed to this by selecting the "Remember Me" option. If you

select this option, a cookie will be placed on your computer which will allow our website to recognise you when you return to our website. No personal information will be stored in this cookie.

5.3 We use a number of different cookies on our site. If you do not know what cookies are, or how to control or delete them, then we recommend you visit www.aboutcookies.org for detailed guidance.

5.4 The following table describes the cookies we use on this site and what we use them for. Currently we operate an 'implied consent' policy which means that we assume you are happy with this usage. If you are not happy, then you should either not use this site, or you should delete our cookies having visited the site.

Persistent Cookies for Site Analytics and Performance

Cookie name	Purpose
<i>Google (Analytics)</i> _utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. More information: Google Analytics Privacy Policy
<i>Add This</i>	Add This helps us to integrate social media sharing tools into our website such as facebook or twitter and to measure the effectiveness of these sharing tools. More information: Add This opt-out
<i>SHL Online local storage</i> <i>local storage-journal</i>	Remembers products you add to your basket. Helps control access and controls where you are in the process. Used to remember your email address to speed up sign-in next time you visit the site (but only if you tick 'Remember Me').

6. Search

6.1 Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by us or any third party.

7. E-newsletter

7.1 We use a third party provider, WordPress to deliver our monthly e-newsletter. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. For more information, please see WordPress Privacy Policy.

7.2 We are currently using a third party tool, Snap Surveys, to seek feedback from users about their experience using the our blog. We will only use the information to improve our site. We will use the

information only in ways that will not identify anyone, and we will not make any attempt to identify anyone from the information we collect. For more information, see the [Snap Survey privacy Policy](#).

8. Email

8.1 Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

9. Complaints

9.1 When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any staff members involved in the complaint.

9.2 We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

9.3 We usually have to disclose the complainant's identity to whoever the complaint is about. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

9.4 We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

9.5 Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

10. Applicants, current and former employees

10.1 We are the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information please contact us at the address given at the end of this Policy, under "Contact Us"

11. What will we do with the information you provide to us?

11.1 All of the information you provide during the process will only be used for the purpose of progressing your application, and to fulfil contractual and legal or regulatory requirements if you are offered a position.

11.2 We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area [EEA]. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

11.3 We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

12. What information do we ask for, and why?

12.1 We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

- The information we ask for is used to assess your suitability for employment. If you don't provide what we ask for it could affect your application and our ability to offer you a position in our company.

13 Application stage

13.1 If you use our online application system, this will be collected by a data processor on our behalf (please see below).

13.2 We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our hiring Managers will have access to all of this information.

13.3 You will also be asked to provide equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of our HR team and hiring managers, in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

14. Shortlisting

14.1 Our hiring managers shortlist applications for interview. They will be provided with your name and contact details but not with your equal opportunities information if you have provided it.

15. Assessments

15.1 We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes. This information is held by us.

15.2 If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of six months. If you say yes, we would proactively contact you should any further suitable vacancies arise.

16. Conditional offer

16.1 If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a

final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

- Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
- Proof of your qualifications, if relevant – you will be asked to attend our office with original documents, we will take copies.
- If required for the job role, we will contact you to complete an application for a Basic Criminal Record check via the Disclosure and Barring Service, which will verify your declaration of unspent convictions.
- We will contact your referees, using the details you provide in your application, directly to obtain references
- We may also ask you to complete a questionnaire about your health. This is to establish your fitness to work.

If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments
- Emergency contact details – so we know who to contact in case you have an emergency at work
- Membership of a Pension scheme.

17. Post start date

17.1 Some roles require a higher level of security clearance. If this is the case, then you will be asked to submit information to a third party to obtain a Disclosure and Barring Service [DBS] check.

18. Use of data processors

18.1 Data processors are third parties who provide elements of our recruitment service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

19. G.Hay & Co Ltd

19.1 If you are employed by us, relevant details about you will be provided to G. Hays & Co Ltd who provide payroll services to the CCM Facilities Ltd. This will include your name, bank details, address, date of birth, National Insurance Number and salary.

20. Pension Schemes

20.1 Likewise, your details will be provided to the administrators of our Pension Schemes. You will be auto-enrolled into the pension scheme and details provided to the administrator will be your name, date of birth, National Insurance number and salary.

21. How long is the information retained for?

21.1 If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 7 years following the end of your employment. This includes your criminal records declaration, fitness to work, records of any security checks and references.

- If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the recruitment campaign.
- Information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the recruitment campaign.
- Equal opportunities information is retained for 6 months following the closure of the recruitment campaign whether you are successful or not.

22. How we make decisions about recruitment?

22.1 Final recruitment decisions are made by hiring managers and members of our recruitment team. All of the information gathered during the application process is taken into account.

- You are able to ask about decisions made about your application by speaking to your contact within our HR team.
- We also offer opportunities for people to come and work with us on an internship basis.
- Applications should be sent directly to us. Once we have considered your application, if we are interested in speaking to you further, we'll contact you using the details you provided.
- We might ask you to provide more information about your skills and experience or invite you to an interview.
- If we do not have any suitable work at the time, we'll let you know but we might ask you if you would like us to retain your application so that we can proactively contact you about possible opportunities in the future. If you say yes, we will keep your application for 6 months.
- We might also ask you to complete our pre-employment checks or to obtain security clearance, both of which are described in this Policy above. Whether you need to do this will depend on the type of work you would be doing for us.
- We ask for this information so that we fulfil our obligations to avoid conflicts of interest and to protect the information we hold.
- It will be retained for the duration of your time with us plus 7 years following the end of your internship.

23. Your rights

23.1 Under the Data Protection Act and EU GDPR, you have rights as an individual which you can exercise in relation to the information we hold about you, namely;

- The right to be informed; why we process the personal data, who we share the data with and how long we will store the data for (see above)
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- The right not to be subject to an automated decision

You can read more about these rights at



<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

24. Access to personal information and the excising of rights

24.1 We try to be as open as we can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'Subject Access Request'. If we do hold information about you we will:

- give you confirmation as to whether or not we are holding any personal data about you and if yes, a description of it;
- tell you why we are holding it and how long for
- tell you your rights in respect of personal data held by us
- tell you who it could be disclosed to;
- let you have a copy of the information in an intelligible form.

However the right to obtain a copy must not adversely affect the rights and freedoms of others

To make an enquiry about any personal information we may hold, you need to put the request in writing addressing it to our Data Security Officer, at the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone. If we do hold information about you, you can ask us to correct any mistakes or exercise any of your other rights by, once again, contacting the Data Security Officer.

25. Disclosure of personal information

25.1 Generally we will not disclose personal data to third parties not listed in this Policy without your consent. However there may be circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics

26. Complaints or queries

26.1 We try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

- This Privacy Policy was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.
- If you want to make a complaint about the way we have processed your personal information, you can contact the ICO (the statutory body which oversees data protection law) at

<https://ico.org.uk/global/contact-us/>

27. Links to other websites

- This privacy Policy does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

28. Changes to this Privacy Policy

- We keep our privacy Policy under regular review. Please ensure you look at it regularly to be aware of any updates.

How to contact us

You can write to:

The Data Security Officer
CCM Facilities Ltd, Trident House Lower Ground Floor 46-48 Webber Street London SE1 8QW or call us on 0207 803 4777