

Website and General Enquiries Privacy Notice

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Document Release:

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1 Introduction

The Stephen James Partnership ("SJP", "we", "us", "our") of St Magnus House, 3 Lower Thames Street, London, EC3R 6HD are committed to protecting and respecting your privacy. The SJP are committed to the protection of the personal data we process in line with the data protection principles set out in the UK General Data Protection Regulation and the EU General Data Protection Regulation (2016/679) (together referred to herein as the "GDPR") and the Data Protection Act 2018 ("DPA18").

This Privacy Notice ("this Notice") explains what personal data the SJP collects from individuals who visit our website, contact us using our web forms, by email, phone or through one of our social channels; or other marketing communications ("you", "your"). It also explains what information we collect automatically when you visit our website and the information we collect when you register to use our services.

The Stephen James Partnership is the Controller of the personal data we process, registered in the UK with the Information Commissioner's Office, registration number Z2051953.

As an information-led business, we place great importance on ensuring the quality, confidentiality, integrity and availability of the data we hold and in meeting our data protection obligations when processing personal data. The SJP are committed to protecting the security of your personal data. We use a variety of technical and organisational measures to help protect your personal data from unauthorised access, use or disclosure.

We update this Notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to the products and services we offer. When changes are made, we will update the date at the top of this document. Please review this Notice periodically to check for updates.

2 What information do we process?

Information you provide to us

We process all information you give us, either through our website https://thesjp.co.uk/ ("our site") or by corresponding with us by telephone, email or otherwise. This includes information you provide when you use our site, register for our service, search for a product or service, or other social media functions linked to our site, or when you report a problem with our site.



Information processed following an enquiry by a Client

We may process the following information:

- Name
- Business Email address
- Business Telephone number(s)
- Any additional information you provide through use of our 'free text' box

We use your name, email address and telephone number to contact you about your enquiry.

Information processed following an enquiry by a Placement Candidate

The personal data processed may include the following:

- Name and contact details (address, mobile phone number and email address)
- Company details (where applicable)
- Date of birth and gender
- · Work history and employment positions held
- Salary, other compensation, and benefits information
- Nationality / visa / work permit information (where applicable)
- Academic and professional qualifications, education, and skills
- Photographs you may submit with your application
- Demographic information
- Records we create during interviews or correspondence with you
- Results of pre-employment screening checks (where applicable)
- Any additional information you provide through use of our 'free text' box

We may also collect special category data in accordance with the Equality Act 2010. We will only do this to make reasonable adjustments to enable all candidates to apply for vacancies, attend interviews and to commence employment. This is also necessary to ensure we meet our legal obligations when recruiting.



Cookies and Web Beacons

Our website uses cookies to better the user's experience while visiting. Our website uses a cookie control system which allows the user, on their first visit to the website, to allow or disallow the use of cookies on their computer / device.

Cookies are small text files saved to the user's computer which track, save and store information about the user's interactions and usage of our website. This allows our website to provide users with a tailored experience. Users are advised that if they wish to deny the use and saving of cookies from our website on to their computer or device, they should take necessary steps within their web browsers security settings to block all cookies from our website.

We use cookies to provide social media features and to analyse our traffic. We also share information about your use of our site with our social media, advertising and analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services.

Our website uses tracking software to monitor our visitors, to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer or device in order to track and monitor your engagement and usage of our website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information.

Other cookies may be stored on your computer by external vendors if we use referral programs, sponsored links or advertisements. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal data is stored, saved or collected.

The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. To install all other types of cookies, we need your consent.



3 Purposes and bases for processing your personal data

We may use your data for the following purposes and on the following lawful bases:

Purpose	Lawful Bases for Processing
Responding to correspondence from you	It is in our legitimate interest to respond to
	enquiries made via our website, by email,
	through our social channels or any other
	means
Registering as a client with the SJP	When you register as a client with us, we
	process your data under the contract
	agreed between us
Registering as a placement candidate with	When you register as a placement
the SJP	candidate with us, we process your data
	with your consent, which may be withdrawn
	at any time by emailing
	privacy@thesjp.co.uk.
	When processing your special category
	data, we do so with your explicit consent,
	which may be withdrawn at any time by
	emailing privacy@thesip.co.uk.
Business management, forecasting and	It is our legitimate interest to identify areas
statistical purposes	for managing current business
	relationships, develop our services and for
	managing our business
Improving our website and the overall	It is our legitimate interest to allow analytics
website visitor and user experience	and search engine providers to help
	improve and optimise our website
Improving our website and the overall	We use cookies on our website with your
website visitor and user experience	consent



Prevention and detection of crime including	We have a legal obligation to report any	
money laundering, fraud or other crimes	such activity to the relevant authorities and	
	regulators	
Analyse and track use of our website and	It is our legitimate interest to monitor our	
portal for reporting and analytical purposes	portal and website usage in order to	
	continually improve the user experience	

4 Sharing your information

We will not share your personal data outside the United Kingdom ("UK"). If this becomes necessary for the purposes of providing our services to you in the future, we will only share it where appropriate safeguards are in place, such as the International Data Transfer Agreement ("IDTA"), approved by the UK government, to ensure your personal data is protected to the same standard expected within the UK.

Our website includes links to other third-party websites and social media platforms (Facebook, Instagram, Twitter). Once you navigate away from our site via one of the links, the site may collect your IP address and may set a cookie on your device. When you use one of these links, you are sharing information to another website or service and this Notice will no longer apply. Please read the Privacy Notices provided by the particular service website you are directed to before posting any personal information using these links.

5 Your rights

The GDPR provides you with certain rights in relation to the processing of your personal data, including to:

- Request access to personal data about you (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you, and to check that we are processing it lawfully.
- Request rectification, correction, or updating to any of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.



- Request personal data provided by you to be transferred in machine-readable format ("data portability").
- Request erasure of personal data. This enables you to ask us to delete or remove personal
 data where there is no good reason for us continuing to process it. You also have the right to
 ask us to delete or remove personal data where you have exercised your right to object to
 processing (see below).
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you (e.g. if you want us to establish its accuracy or the reason for processing it).
- Object to the processing of your personal data in certain circumstances. This right may apply where the processing of your personal data is based on the legitimate interests of the SJP.

Some of these rights are not absolute and are subject to various conditions under applicable data protection and privacy legislation, laws, and regulations to which we are subject. If at any time you decide that you no longer wish to be contacted for marketing purposes, or if you would like to exercise any of your rights as set out above, you can contact us at privacy@thesjp.co.uk. 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 for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

In addition to the above, please note that you have the right to make a complaint at any time to the <u>Information Commissioner's Office</u> if you are concerned about the way in which we are handling your personal data.

6 Data retention period

We will retain your personal data for as long as is necessary to provide you with our products and ongoing services and for a reasonable period thereafter, to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your personal data will be securely deleted in accordance with the SJP Personal Data Retention Policy.



7 Contact

You can contact the SJP in relation to data protection and this Privacy Notice by emailing privacy@thesjp.co.uk.