

Langhill Associates Ltd

Privacy Policy

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Langhill Associates Ltd collects and processes your personal data, including any data you may provide through third party websites i.e. LinkedIn.

Our services are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Langhill Associates Ltd is the data controller and is responsible for this website.

In most cases we will be the Data Controller as we determine the purpose and manner in which your personal data will be managed and used.

In rare occurrences we will be the Data Processor where we manage your data on behalf of the data controller. If you wish to know under which capacity we are handling your data please contact us at info@langhill.co.uk.

We respect your right to privacy and are committed to complying with applicable data protection and privacy law. We will only collect personal information about you with your awareness and permission.

At any time you have the right to withdraw your consent for the processing of your data. Please be aware whilst you can request to withdraw your consent it will not affect the lawfulness of processing based on consent before its withdrawal.

Any personal information which you provide to us and/or which we obtain about you, will be kept confidential and secure using appropriate technical measures and by ensuring staff are continually trained and are aware of how to protect your data.

What data do we collect?

We collect data about you when you register with us or when you contact us and provide us information voluntarily.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes personal address, correspondence address, email address and telephone numbers.
- **Profile Data** includes requests for services made by you; your interests, preferences, feedback.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

If you fail to provide personal data where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

Where is your data kept?

The information we receive is handled and processed by our staff who are located in the UK. No third party will have access to your personal data unless the law permits them and we will take steps to give exactly the amount of data required only. Our data is also stored on an online database which are also password protected and are for staff use only. Any data that is held outside our online database is kept in paper files in a secure location in our offices.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Employment Details by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our services;
 - request marketing to be sent to you;
 - give us some feedback.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
 - Contact, Financial and Employment Data from providers of various services.
 - Identity and Contact Data from publicly available sources such as LinkedIn, Indeed.

How we use your personal data?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the services we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to marketing at any time by contacting us at info@langhill.co.uk

Purposes for which we will use your personal data:

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at info@langhill.co.uk if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Incoming Phone Call/Initial Call – To register you as a candidate and/or to follow up on your contact via publicly available sources	(a) Identity (b) Contact (c) Address (d) Marketing & Communication	(a) A customer who is looking to explore alternative employment options has searched for our service and willingly contacted us either via email/phone call or through publicly available sources. This therefore constitutes affirmative action for us to collect this data to process with a view to contacting them to discuss and offer our service and understand their requirements further.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you which will include:		
(a) Notifying you about changes to our terms or privacy policy	(a) Identity	(a) A customer who is looking to explore alternative employment options and willingly provided us with the data we ask for whilst on an inbound phone call. This therefore constitutes affirmative action for us to collect this data with a view to discussing and offering our service and understand their requirements further
(b) Updating you on the progression of your application	(b) Contact	
	(c) Address	
	(d) Marketing & Communication	
(c) To offer you alternative opportunities that may be of interest to you based on the information you have given to us	(e) Financial	(b) Necessary for our legitimate interests (to keep our records updated)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support)	(a) Identity	(b) Necessary to comply with a legal obligation
	(b) Contact	
	(c) Profile	(c) Necessary for our legitimate interests (to keep our records updated)
	(d) Marketing & Communications	(d) Necessary for our legitimate interests to inform you of the progress of your application
To deliver relevant opportunities to you and measure or understand the effectiveness of the service we serve to you	(a) Identity	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, security, etc)
	(b) Contact	
	(c) Technical	(b) Necessary to comply with a legal obligation
	(a) Identity	
	(b) Contact	
	(c) Profile	
	(d) Usage	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
	(e) Marketing and Communications	
	(f) Technical	
	(a) Technical	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
	(b) Usage	

Who your information might be shared with?

We may disclose your personal data to:

- our lawyers, agents and service providers;
- law enforcement agencies in connection with any investigation to help prevent unlawful activity;
- we may also disclose your information for the prevention and detection of crime and to protect the interests of the Company; and

- if we are required to send your data to any other third parties we will only do so with your explicit consent.

Sharing your personal data outside of the United Kingdom

Under GDPR the rules inside of the UK and the EEA will be the same with regard to personal data, as such we are able to trust the built-in safeguards. If we are required to send any of your data outside of the EEA we will send you information on the reason for this, how the data will be protected and details of how to obtain copies of the relevant safeguards.

Handling special data

The GDPR defines special data as more sensitive thus it needs more protection. Due to the nature of our business we might be required to hold and process some of this data. The categories which we could potentially process include (but not limited to): race, ethnic origin, politics, religion, health, sex life or sexual orientation.

Please be aware we will not require this information unless it is pertinent to your individual circumstance and the service we will deliver to you. We will require your explicit consent to handle this data or if processing is necessary for the establishment, exercise or defence of legal claims.

Length of time we will keep your data

We will keep your personal information for as long as necessary for the purposes for which it was collected, to provide you with services and to conduct our legitimate business interests or where otherwise required by law.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Usually we keep your personal information for a minimum of 6 years after which time it will be destroyed. If you need further information regarding retention and deletion of your data, please contact us on **0113 2632031**.

Marketing

We would like to send you information about services of ours which may be of interest to you. If you have consented to receive marketing, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes.

If you wish to be contacted for marketing purposes, please contact us at info@langhill.co.uk

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or services from us and you have not opted out of receiving that marketing.

Collection and use of technical information

Depending on the type of browser you are using, you may be able to configure your browser so that:

- you are prompted to accept or reject cookies on an individual basis; or
- to prevent your browser from accepting any cookies at all.

You should refer to the supplier or manufacturer of the web browser for specific details about cookie security.

We may collect and store certain ‘technical information’ about your visit to this site, such as:

- the IP address from which you access this **website**;
- the type of browser and operating system used to visit this site;
- the date and time of your visit(s) to this site;

- clickstream data which reveals the activities of visitors around this **website**; and website address of the **website** from which you accessed this site.
- For more information about the cookies we use, please see our [cookie policy](#)

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at info@langhill.co.uk

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Your rights under GDPR

1. **Right to be informed**

We must inform you about the data processing we will be carrying out using your data in concise, transparent and easily accessible language.

2. **Right of access**

You can request a copy of your information which we hold (this is known as a subject access request) free of charge. If you would like a copy of it, please:

- Either, email, call or write to us (see ‘How can you contact us?’ below)
- Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility bill), and
- Let us know the information you want a copy of

3. **Right of rectification**

If you believe we have any data which is incorrect you have the right of rectification which is free of charge where we will have one month (two if the information is complex) to make the necessary corrections. If you would like to do this, please:

- email, call or write to us (see ‘How can you contact us?’ below)
- let us have enough information to identify you, and
- let us know the information that is incorrect and what it should be replaced with

4. **Right of erasure**

You are able to request we remove all of the personal data we hold on you however we can only do this in specific circumstances. Please contact us to discuss how this can be done.

5. **Right to restrict processing**

You are able to request we block or suppress the processing of your personal data. If this occurs, we are able to store but not further process it.

6. **Right to object**

You have the right to object to the processing if it’s based on legitimate interests, direct marketing and for historical/scientific and/or statistics.

7. **The right to lodge a complaint**

If for any reason you wish to make a complaint with regard to our handling of your personal data, you may do so at the Information Commissioners Office (ICO).



No fee usually required

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 is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

How to contact us

Please contact us if you have any questions about this notice or the information we hold about you. You can contact us in the following ways:

By email: info@langhill.co.uk

By telephone: 0113 2632031

By post: Langhill Associates Ltd, Unit 63 Burley Hill Trading Estate, Burley Road, Leeds, LS4 2PU

Changes to this notice

We may change this notice from time to time. You should check this notice occasionally to ensure you are aware of the most recent version.