Website Privacy Policy



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1.0 OUR CORE BELIEFS REGARDING USER PRIVACY AND DATA PROTECTION

User privacy and data protection are human rights

We have a duty of care to the people within our data

Data is a liability, it should only be collected and processed when absolutely necessary

We loathe spam as much as you do!

We will never sell, rent or otherwise distribute or make public your personal information

2.0 RELEVANT LEGISLATION

Along with our business and internal computer systems, this website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

UK Data Protection Act 1988 (DPA)

EU Data Protection Directive 1995 (DPD)

EU General Data Protection Regulation 2018 (GDPR)

Australian Privacy Act 1988 (APA)

This site's compliance with the above legislation, all of which are stringent in nature, means that this site is likely compliant with the data protection and user privacy legislation set out by many other countries and territories as well. If you are unsure about whether this site is compliant with your own country of residences' specific data protection and user privacy legislation you should contact our data protection officer (details of whom can be found in section 9.0) for clarification.

3.0 PERSONAL INFORMATION THAT THIS WEBSITE COLLECTS AND WHY WE COLLECT IT

This website collects and uses personal information for the following reasons:

3.1 Site visitation trackingGoogle AnalyticsConfigurator

Contact Form – email sent to <u>justin@bmrecruitment.co.uk</u> – details not stored on website

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor (see section 6.0 below).

GA makes use of cookies, details of which can be found on <u>Google's developer</u> guides.

Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

In addition to Google Analytics, this website may collect* information (already held in the public domain) attributed to the IP address of the computer or device that is being used to access it.

3.2 Our blog

There is no option to post on our blog and is purely read only.

3.3 Contact forms and email links

Should you choose to contact us using the contact form on our contact us page none of the data that you supply will be stored by this website or passed to / be processed by any of the third party data processors defined in section 6.0. Instead the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol (SMTP). We would suggest that you always consider email as an insecure medium and not include personal, confidential or otherwise sensitive information within an email.

4.0 HOW WE STORE YOUR PERSONAL INFORMATION

As detailed in <u>section 3.2</u> above, if you submit a comment to a blog post published on this website some personal information will be stored within this website's database. This is currently the only occasion where personal data will be stored on this website. This data is currently stored in an identifiable fashion; a limitation of the content management system that this website is build on (WordPress). In the near future we aim to change the storage of this data to a pseudonymous fashion meaning that the data would require additional processing using a separately stored 'key' before it could be used to identify an individual.

Pseudonymisation is a recent requirement of the GDPR which many web application developers are currently working to fully implement. We are committed to keeping it as a high priority and will implement it on this website as soon as we are able to.

5.0 ABOUT THIS WEBSITE'S SERVER

This website is hosted by We Are Formed.

Some of the data centre's more notable security features are as follows:

- 3m rota-spike security fence and perimeter anti ram barriers
- Blast proof anti-intruder shielded external windows and doors
- Proximity access locks on all external and internal doors
- Interlocked man-trap doors with biometric iris scanners to gain access into data floors
- Server cabinets have locked doors (no open racks)
- Perimeter and internal IP CCTV system monitored 24×7
- 24×7 on-site security guards with static and mobile patrols
- All on-site personnel are security vetted to BS7858 standard
- Only authorised security cleared staff are allowed into the facility

6.0 OUR THIRD PARTY DATA PROCESSORS

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the legislation set out in <u>section 2.0</u>. All 2 of these third parties are based in the USA and are <u>EU-U.S Privacy Shield</u> compliant.

- Google (<u>Privacy policy</u>)
- Mailchimp (<u>Privacy policy</u>)

7.0 DATA BREACHES

We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

8.0 DATA CONTROLLER

The data controller of this website is: Barber McLelland, a UK Private limited Company with company number: 09398769

Whose registered office is: Barber McLelland

Omnia Offices

Courtwood House

Silver Street Head

Sheffield

S12DD

9.0 DATA PROTECTION OFFICER

Mr. Justin Barber Director, Barber McLelland Ltd. Telephone: 0114 279 2843

Email: justin@bmrecruitment.co.uk.

10.0 CHANGES TO OUR PRIVACY POLICY

This privacy policy may change from time to time inline with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes. Specific policy changes and updates are mentioned in the change log below.