

# CARTERJAY LIMITED – PRIVACY POLICY

## How we use your information

Please read the following information carefully. This privacy policy contains details about the information collected, stored and otherwise processed about you and the reasons for the processing. It also tells you who we share this information with, your rights, and how to contact us in the event you need further details.

### 1. Who are we?

CarterJay Limited is a legal recruitment agency. We provide permanent recruitment services to clients looking to recruit talent for their legal business. When acting for a client on a piece of recruitment or acting on behalf of a candidate seeking employment, we act as a controller of certain information, sometimes including sensitive information.

If you want to contact us, you can do so in the following ways:

- Telephone Peter Robertson on 07834436775.
- Email Peter at [peter@carterjay.co.uk](mailto:peter@carterjay.co.uk)
- Write to Peter Robertson at CarterJay Limited, 71-75 Shelton St, London WC2H 9JQ.

### 2. The information that we may hold.

We hold the following different types of personal information:

<b>CLIENT INFORMATION.</b>	
The type of information that we hold.	<p>We collect the information necessary for us to operate as a legal recruitment agency. If you are a client, instructing us on a particular piece of recruitment, then we need information about the firm so that we (including our recruiters) can work on that recruitment mandate. The information that we hold will vary from time to time, but may include:</p> <ul style="list-style-type: none"><li>• Name and contact details of the firm.</li><li>• Name and contact details of additional members of the Human Resources Department and relevant Partners.</li></ul>

	<ul style="list-style-type: none"> <li>• Any further information provided by the client in the relevant job specifications and/or communications.</li> <li>• Financial details, such as salary and bonus.</li> </ul>
Why we hold it.	<p>We use this information:</p> <ul style="list-style-type: none"> <li>• So that we can work on a particular piece of recruitment for our clients.</li> <li>• To allow us to find appropriate candidates for our clients.</li> <li>• To better understand legal market trends.</li> <li>• For marketing purposes.</li> </ul>
Why we are allowed to use the information.	<ul style="list-style-type: none"> <li>• Consent – When you provide this information to us you consent for us to work with you.</li> <li>• Contract - We need this information to perform the contract between us and the client.</li> <li>• Legitimate interest – We have a legitimate interest in being able to operate as a recruitment agency.</li> </ul>
Who we will share the information with.	<ul style="list-style-type: none"> <li>• We will share your information with our candidates when you have roles or opportunities that may interest them.</li> <li>• See section 3 below for who else we may share your information with.</li> </ul>
How long we will hold the information for.	<ul style="list-style-type: none"> <li>• We will keep details of roles and job specifications for as long as is necessary for us to use your information as described above or to comply with our legal obligations.</li> <li>• We may keep contact details for the lifespan of the company, for marketing purposes (although if you ask us not to we shall delete them when they are no longer needed for other purposes).</li> <li>• We will keep any electronic records (including emails) for up to 8 years after the end of a particular piece of recruitment has concluded.</li> <li>• If there is a dispute between us, for example you have not paid us, or you have made a complaint, then we may keep</li> </ul>

	that information for longer, for up to 3 years until the dispute has finally been resolved.
How we obtain the information.	<p>We may obtain information about you from the following sources:</p> <ul style="list-style-type: none"> <li>• Directly from you, via email or phone.</li> <li>• From your website.</li> <li>• From publicly available sources, such as the legal press.</li> </ul>

<b>CANDIDATE INFORMATION.</b>	
The type of information that we hold.	<p>We collect the information necessary for us to operate as a legal recruitment agency. If you are a candidate, that we (and our recruiters) are working with, in search of new employment, then we need information about you so that we can find you a suitable role. The information that we hold will vary from time to time, but may include:</p> <ul style="list-style-type: none"> <li>• Name and contact details.</li> <li>• Education, training and employment details.</li> <li>• Additional details provided by you on your CV.</li> <li>• Financial details, such as salary and bonus.</li> <li>• Right to work details.</li> <li>• In certain circumstances, we may need to collect and process sensitive personal data about you which for example may include information about your health (including details of any sick leave taken in previous roles) or whether you are a member of any professional or trade associations.</li> </ul>
Why we hold it.	<p>We use this information:</p> <ul style="list-style-type: none"> <li>• To allow us to find the candidate appropriate employment.</li> <li>• So that we can work on a particular piece of recruitment for our clients.</li> <li>• For marketing purposes.</li> </ul>

<p>Why we are allowed to use the information.</p>	<ul style="list-style-type: none"> <li>• Consent – When you provide this information to us you consent for us to work with you.</li> <li>• Contract – We need this information to perform the contract between us and the client.</li> <li>• Legitimate interest – We have a legitimate interest in being able to operate as a recruitment agency.</li> </ul>
<p>Who we will share the information with.</p>	<ul style="list-style-type: none"> <li>• We will share your information with our clients if/when you consent to a role or approach.</li> <li>• See section 3 below for who else we may share your information with.</li> </ul>
<p>How long we will hold the information for.</p>	<ul style="list-style-type: none"> <li>• We will keep your details for as long as is necessary for us to use your information as described above or to comply with our legal obligations.</li> <li>• We may keep contact details for the lifespan of the company, for marketing purposes (although if you ask us not to we shall delete them when they are no longer needed for other purposes).</li> <li>• We will keep any electronic records (including emails) for up to 8 years after the end of a particular piece or recruitment has concluded.</li> <li>• If there is a dispute between us, for example you have made a complaint, then we may keep that information for longer, for up to 3 years until the dispute has finally been resolved.</li> </ul>
<p>How we obtain the information.</p>	<p>We may obtain information about you from the following sources:</p> <ul style="list-style-type: none"> <li>• Directly from you, via email or phone.</li> <li>• Directly from you when you apply for a role via our website.</li> <li>• From your company website, where there is a public profile.</li> <li>• From sources such as LinkedIn, where you have provided a public profile.</li> <li>• From publicly available sources, such as the legal press.</li> </ul>

### **3. Other people we may provide information to.**

In addition to what is set out in section 2 above we may also share information with the following people.

#### **Employees of CarterJay Limited either present or future.**

We will share information with employees (including our recruiters) so that we can operate as a recruitment agency. We may also from time to time share your information with part-time staff such as researchers. Whenever we share information with anyone, we shall always do so on the grounds that it is confidential.

#### **IT support.**

We use the following third-party suppliers. These suppliers may therefore have access to your information:

- We use Google Drive and Dropbox to remotely store information in the cloud.
- We use Wix.com to host our website.

These suppliers sometimes operate outside of the UK and the EU. In the case of Dropbox and Google Drive we rely on Privacy Shield arrangements (an acknowledge by the EU commission that the provider has adequate security provisions in place – to obtain further details see [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en)).

#### **Legal advice and disputes.**

We may need to share your information with our legal advisors. If there is a dispute between us or you make a complaint, we may also need to share your information with any person adjudicating on that dispute or complaint.

#### **At your request.**

There may be circumstances where you ask us to disclose your information to somebody, for example you ask us for a reference.

#### **4. Marketing.**

Occasionally we put on events or training that may be of interest to you. We may use your personal information to contact you about such events or training, but we will only do so where:

- We have your express consent; or
- You are a client or a candidate with whom we have worked with, and a request has been made to not contact you. If you do not wish to receive such communications, please just let us know.

#### **5. Legitimate Interests.**

Where we have referred to having a legitimate interest to use any of your information, then we have balanced our legitimate interest against your rights and interests to have your information protected. If you would like details about how we have done this, please contact us. You may also object to us processing the information in this way – see the “right to object” in section 7 below.

#### **6. Withdrawal of consent.**

Where we rely on your consent to use your information you may withdraw that consent at any time by contacting us using the details in section 1 above. We shall then stop using your information, unless there is another applicable reason for which we can use it set out in section 2 above. The withdrawal of consent shall not affect the lawfulness of any use of the information that occurred prior to the withdrawal of consent.

Please note that if you are a client or candidate and you withdraw your consent for us to use your information, then we may not be able to continue to work on your piece of recruitment/ help you secure a new role.

#### **7. Your rights.**

If we hold information about you then you have the following rights in respect of our use of that information:

- A right of access to your information and to details about how we use your information.

- A right to rectification of inaccurate information.
- A right to have information erased (a right to be forgotten).
- A right to restrict the use that we can make of your information.
- A right to information portability.
- A right to object to the processing of your information.

To exercise any of these rights contact us using the details in section 1 above. You can find more detail about these rights below.

We will comply with any of these rights as soon as possible and in any event no later than one month from the request (although if the request is complex or there are numerous requests we may extend this by up to two further months).

We will not charge for any request, unless it is manifestly unfounded or excessive (for example because it is repetitive). If a request is manifestly unfounded or excessive then we will either charge a reasonable fee for administrative costs to comply with it, or we will tell you that we are not going to comply because it is manifestly unfounded or excessive.

### **Access to information.**

You may request access to the information that we hold about you, together with information about the purposes for which we use that information, the type of information we hold, who we disclose it to, and the length of time which we hold it for. This is commonly referred to as a subject access request.

### **Right to rectification.**

If we hold any inaccurate information about you, please let us know as soon as possible and we will correct it. You may also request that we supplement any incomplete information that we hold about you.

If we rectify or supplement any information that we hold about you then we will let any third parties to whom we have provided this information know, unless this is impossible or disproportionate. If you ask us to, we will tell you to whom we have disclosed this information.

### **Right to erasure.**

In certain circumstances you can ask that we erase the information that we hold about you:

- We no longer need to keep it for the purposes for which it was collected or used.
- Our only basis to process it is your consent and you withdraw that consent.
- You object to our use of the information and we do not have any overriding legitimate grounds to continue using the information.
- We are using the information unlawfully.
- We have to erase it in order to comply with a legal obligation.

If you wish to have information about you erased, please contact us and we will consider the request.

If we erase any information that we hold about you then we will let any third parties to whom we have provided this information know, unless this is impossible or disproportionate. If you ask us to, we will tell you to whom we have disclosed this information.

### **Right to data portability.**

Where our processing of your information is based on consent and the processing is carried out by automated means then you have the right to have that information provided to you in a commonly used format, provided that this is technically feasible.

### **Right to restrict processing.**

In certain circumstances you can ask that we restrict how we use your information:

- You have made a request for rectification or to supplement inaccurate information. You can ask that we restrict your processing while we deal with your request.
- The use of the information is unlawful, but you ask that we restrict our use of the information rather than delete it.
- We no longer need to use it, but you want us to keep it so that you can use it for another purpose.

In these circumstances we will stop using your information (although we may still store it).

If we restrict our use of any information that we hold about you then we will let any third parties to whom we have provided this information know, unless this is impossible or disproportionate. If you ask us to we will tell you to whom we have disclosed this information.



## **Right to object.**

You have the right to object to us using your information where we base our use on either it being in the public interest or it being for legitimate interests (see section 2 above). If you do so and we have no other basis to process it, we can only continue to process it if we can demonstrate that we have compelling grounds to do so which override your interests.

## **8. Cookies.**

To provide you with the best possible service on our website, we use Cookies to collect your personal data when you browse. See below for our Cookie Policy.

## **9. Complaints.**

Our use of information is regulated by the Information Commissioner. If you would like to complain about us, you can contact the Information Commissioner on 0303 123 1113. More information about your right to complain can be found at <https://ico.org.uk>

## **10.Cookie Policy.**

Our website uses Cookies to distinguish you from other users. By continuing to browse our website, you are agreeing to our use of Cookies.

### **What do we use Cookies for?**

Cookies are small pieces of data stored on your browser (such as Google Chrome or Safari) on your desktop, laptop, tablet or mobile phone. We use Cookies to allow the website to function correctly, to make the website easier to use and to help the website recognise your device which in turn helps it remember information about your visit e.g. preferences and settings.

Cookies allow us to monitor use of our website. We may, from time to time, generate statistics about how many visits our website gets. We may use services such as Google Analytics to do this. This allows us to keep our website up-to-date. This information will not identify you and any personal information will be treated as stated above in the Privacy Policy.

We use both session and persistent Cookies. Session Cookies expire after a browser session. Persistent Cookies are stored on your device in-between browser sessions and do not expire once the browsing session closes.

### **Types of Cookies we use.**

Essential Cookies. These Cookies are essential to allow our website to work correctly. They allow you to move around the website freely.

Performance Cookies. These Cookies provide information that helps us improve our website such as areas visited, and time spent on the website.

Functionality Cookies. These Cookies allow us to provide a more personalised website experience. They will remember if you have previously visited our website.

Targeting Cookies. These Cookies allow us to make our website more relevant to your specific interests.

We use Wix.com to host our website. The table below shows which Cookies Wix.com implements on their websites.

Cookie Name	Life Span	Purpose
svSession	Permanent	Creates activities and BI
hs	Session	Security
incap_ses_{{Proxy-ID}}_{{Site-ID}}	Session	Security
incap_visid_{{Proxy-ID}}_{{Site-ID}}	Session	Security
nlbi_{{ID}}	Persistent Cookie	Security
XSRF-TOKEN	Persistent Cookie	Security
smSession	Two weeks	Identify logged in site members

## **How to manage Cookies.**

The majority of browsers are set-up to automatically accept Cookies. You can alter the settings in the browser to manage Cookies. However, if you block all Cookies you may not be able to access all or parts of our website.