

## **James Gray Associates Ltd Data Protection Policy**

As a recruitment company the James Gray Associates Ltd processes personal data in relation to its own staff, work-seekers and individual client contacts. It is vitally important that we abide by the principles of the Data Protection Act 1998 set out below.

### **Introduction**

- James Gray Associates Ltd is committed to protecting the rights of individuals to privacy with regard to the processing of personal data
- It is necessary for James Gray Associates Ltd to process personal data in the normal and proper conduct of business operations
- Such processing will be conducted fairly and lawfully in accordance with the Data Protection Act 1998
- If there is a query regarding the accuracy of your personal data then your query will be dealt with fairly and impartially

### **General Use of Personal Data**

- James Gray Associates Ltd holds data on prospective, current and former candidates; prospective, current and former staff; and businesses interested in our services
- This data is held securely in electronic and/or as a paper record
- The processing of this data is subject to the rules laid down under the Data Protection Act 1998
- Personal data will only be used for the proper purposes of the employment business
- The protection of your personal data will be governed by the provisions of the Data Protection Act 1998. Access to your data will be restricted to those personnel to whom it is necessary for proper purposes
- James Gray Associates Ltd will not sell your personal data to third parties. Your personal data will only be transferred to third parties where there is a proper purposes related to business matters and with your knowledge.

### **James Gray Associates Ltd holds data on individuals for the following general purposes:**

- Staff Administration
- Advertising, marketing and public relations
- Accounts and records
- Administration and processing of work-seekers personal data for the purposes of work-finding services

### **The Eight Principles of Data Protection**

1. Process personal data fairly and lawfully
2. Obtain personal data only for one or more specified and lawful purposes and to ensure that such data is not processed in a manner which is incompatible with the purpose or purposes for which it was obtained
3. Ensure that personal data is adequate, relevant and not excessive for the purpose or purposes for which it is held
4. Ensure that personal data is accurate and, where necessary, kept up to date
5. Ensure that personal data is not kept for any longer than is necessary for the purpose for which it was obtained
6. Process personal data in accordance with the rights of the individuals to whom the information relates
7. Ensure that personal data is kept secure
8. Ensure that personal data is not transferred to a country outside the European Economic Area unless the country to which the information is to be sent ensures an adequate level of protection for the rights (in relation to the information) of the individuals to whom the personal data relates.

### **Your Rights**

- You are entitled to have a copy of the information we hold about you. This right is the 'right to subject access' under the Data Protection Act. You are also entitled to be told where the information came from, what it is used for and if it is disclosed to anyone. There are some specific exceptions as set out in the Act; for example, we are allowed to refuse requests where releasing the information would prejudice the privacy rights of a third party.
- You can contact us to request a copy of the information we hold. Requests can be made either in writing or by email to the address used for your job application and after the payment of a fee.
- We must be sure that we are releasing information to the right person. So you will be asked to supply information to prove your identity.
- All requests to access data by data subjects i.e. staff, members, customers or clients, suppliers, students etc. should be referred to Nick Day; Write: James Gray Associates Ltd @ Abbeyview, 38-40 The Maltings, St Albans, Herts, AL1 3HL. Registered England & Wales: 5815110 VAT: 927 674681. Telephone: 01727 800377 E-mail: [info@jgarecruitment.com](mailto:info@jgarecruitment.com)

Any requests for access to a reference given by a third party must be referred to Nick Day and should be treated with caution even if the reference was given in relation to the individual making the request. This is because the person writing the reference also has a right to have their personal details handled in accordance with the Data Protection Act 1998, and not disclosed without their consent. Therefore when taking up references an individual should always be asked to give their consent to the disclosure of the reference to a third party and/or the individual who is the subject of the reference if they make a subject access request. However if they do not consent then consideration should be given as to whether the details of the individual giving the reference can be deleted so that they cannot be identified from the content of the letter. If so the reference may be disclosed in an anonymised form.

Finally it should be remembered that all individuals have the following rights under the Human Rights Act 1998 and in dealing with personal data these should be respected at all times:

- Right to respect for private and family life [Article 8]
- Freedom of thought, conscience and religion [Article 9]
- Freedom of expression [Article 10]
- Freedom of assembly and association [Article 11]
- Freedom from discrimination [Article 14]

James Gray Associates Ltd uses secure and confidential means of destroying data after the relevant holding period.