



Global Highland Ltd (hereinafter referred to as “The Company”) is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process data (including sensitive personal data) so that it can provide these services; in doing so, the Company acts as a data controller.

This Privacy Policy outlines how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights in line with the General Data Protection Regulation (EU) 2016/679 (GDPR).

This Privacy Policy applies to the personal data of our Website Users ([www.globalhighland.com](http://www.globalhighland.com)), Candidates, Clients, and 3<sup>rd</sup> Party individuals whom we may contact for the purposes of providing work-finding services, payroll processing and/or contractual processing.

## 1. HOW WE COLLECT YOUR DATA

You may give your personal details to the Company directly, such as on an application or registration form or via our website registration, or we may collect them from another source such as a jobs board. Upon receipt of your information, we will issue you with a Privacy Notice which will confirm our legal basis for collection and use of your data.

For the purposes of providing you with work-finding services and/or information relating to roles we believe to be relevant to you, we will only use your personal data in accordance with the terms of the Privacy Notice issued.

Personal Data collected and processed includes but is not limited to:

Name, Address, Telephone/Email contact, Passport, Employment History, Education History/Certification, Referees, Next of Kin/Emergency Contact details, Bank details, NI Number.

We may also collect information about your computer and your visits to and use of this website, such as your geographical location, IP address, browser type, referral source, length of visit and number of page views. This information will not be shared with external third parties.

## 2. COOKIES

We may use cookies on this website. A cookie is a text file sent by a web server to a web browser and stored by the browser. The text file is then sent back to the server each time the browser requests a page for the server. This enables the web server to identify and track the web browser.

We may send a cookie which may be stored by your browser on your hard drive. We may use the information we obtain from the cookie in the administration and optimisation of our website to improve our websites usability and for marketing purposes. We may also use that information to recognise your computer when you visit our website and to personalise our website for you.

Most browsers allow you to refuse to accept cookies (in internet options → settings). Selecting to block all cookies may affect your experience while browsing the site, and enhanced features directed towards users with cookies enabled will not appear.

We will be using Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by using cookies which are stored as mentioned above. This information is used to create reports about use of our website. Google will store this information for their Privacy Policy (please visit <http://www.google.com/privacypolicy.html>).

### 3. WHAT WILL YOU USE MY DATA FOR?

#### Candidate Data:

The Company will process your personal data and/or sensitive personal data with the following recipients:

The Company's Clients – recruiting for contract, temporary and permanent vacancies – consent will be obtained for each individual Client your CV is presented to.

#### 3rd Party Data:

Permission will be sought by The Company at the appropriate point in the recruitment process to contact referees in support of your application.

Next of kin and emergency contact information will be required for Candidates who we provide on a contract or temporary basis to our clients. On provision of this information to The Company, it is understood that you have sought permission for the 3<sup>rd</sup> party to onpass their contact information for the required purpose.

#### Client Data:

The Company will process Client and Client contact data in order to provide Candidate CV's for review against permanent, contract or temporary roles that you request services for.

Job description data received for each vacancy will be shared with potential Candidates in order to obtain consent to share their details with your organisation.

We may also use your personal information to:

- Administer the website and improve your browsing experience by personalising the website, or to enable your use of the services available
- Send you general (non-marketing) communications, or send you email alerts/notifications which you have specifically requested in the 'Candidate Registration' section of this website. You can opt out of this at any time by logging into your account and changing your preferences.

We will not, without your express consent, provide your personal information to any third parties for the purpose of direct marketing.

### 4. WHERE WILL BE DATA BE STORED?

The Company stores all Candidate and Client information in a secure database, which has limited access by The Company data processors.

Candidates who we provide payroll services or provide on a contract basis to our Clients' information will also be stored in our Payroll software. Information from payroll is shared as required under payroll/contractual obligations i.e. HMRC, Pension Auto Enrolment Provider.

We may be required to share your data when required by law or to help protect the rights and safety of you, us or others.

We do not share your data with 3<sup>rd</sup> Parties without your explicit consent. This does not include trusted 3<sup>rd</sup> Parties who assist us in operating our website, provision of IT/Application support and external auditors who may view data in the course of their upkeep/maintenance and audit of our business systems. All 3<sup>rd</sup> parties with access to this data agree to adhere to strict confidentiality rules regarding any information viewed.

## 5. OVERSEAS TRANSFERS

The Company may transfer only the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. We will notify you if we require to do so (i.e. where our Client is outside the EU) and take steps to ensure adequate protections are in place to ensure the security of your information or advise you where we are unable to provide such assurance. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

## 6. DATA RETENTION

The Company will retain your personal data in line with our Retention Policy. Different laws require us to keep different data for different periods of time. For more information, please review our [GHL Data Retention Policy Statement](#).

The Conduct of Employment Agencies and Employment Business Regulations 2003 require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

Where the Company has obtained your consent to process your personal data, we will do so in line with our retention policy. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal data.

## 7. UPDATING DATA

Please let us know if the personal information which we hold about you needs to be corrected or updated, as soon as reasonably practical to do so.

## 8. DATA SECURITY

We will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will advise you of any data breach which may have resulted in the unauthorised accessing of your information as soon as is practicably possible after detection of any such data breach.

## 9. YOUR RIGHTS

[Know-your-rights-Jobseekers](#)

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;

- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time

Where you have consented to the Company processing your personal data you have the right to withdraw that consent at any time by contacting Lyndsey Wilkinson, Business Director – [lyndsey.wilkinson@globalhighland.com](mailto:lyndsey.wilkinson@globalhighland.com)

## 10. COMPLAINTS

If you wish to complain about this Privacy Policy or any of the procedures set out in it, please contact Lyndsey Wilkinson, Business Director – [lyndsey.wilkinson@globalhighland.com](mailto:lyndsey.wilkinson@globalhighland.com)

You also have the right to raise concerns with the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK if you believe that your data protection rights have not been adhered to.

## 11. THIRD PARTY WEBSITES

The website may contain links to other websites. We are not responsible for the privacy policies or practices of third party websites you choose to browse to from our website.

## 12. SITE TERMS & CONDITIONS

### Logos/Branding

To use any artwork/images/animations featured on this site, please email Iona Currie, Group Recruitment Director at [IonaCurrieGH@geggroup.com](mailto:IonaCurrieGH@geggroup.com) for permission enquiries.

## 13. ACCOUNTS AND PASSWORDS

If you have registered with this website, your username and password must be kept confidential and used only by you. We reserve the right to disable any account allocated by us at any time if, in our opinion, you have failed to comply with any of the terms in this agreement.

## 14. YOUR CONDUCT

You must not use the website in any way that causes or is likely to cause the website or access to it to be interrupted, damaged or impaired in any way. You understand that you are solely responsible for all electronic communications and consents sent from your computer to us. You must use the website for lawful purposes only. You must not use the website for any of the following:

- For fraudulent purposes or in connection with a criminal offence or otherwise carry out unlawful activity indecent, harmful, defamatory, obscene or menacing, racist, abusive, threatening, invasive of privacy, in breach of confidence, infringes any intellectual property rights; or is otherwise injurious to third parties; or objectionable; or which consists of or contains software viruses, trojan horses, worms, time bombs, keystroke loggers, spyware, adware or any other political campaigning, commercial solicitation, chain letters, mass mailings;
- To impersonate any third party or otherwise mislead as to the origin of your person or entity;
- To reproduce, duplicate, copy or resell any part of our site in contravention with these terms of use or any other agreement with Global Highland Ltd.

## 15. GOVERNING LAW

These Terms and Conditions shall be governed and construed in accordance with the laws of Scotland, whose courts shall have exclusive jurisdiction, although we retain the right to bring proceedings against you for breach of these conditions in your country of residence or other relevant country.



**Lyndsey Wilkinson**  
**Business Director**

NOTE: Persons under the control of Global Highland Ltd includes: Direct employees, contract personnel, Sub-contractor personnel, Consultants and Service Providers (where operating on GHIL Controlled Sites)

**GLOBAL**  
**HIGHLAND**

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