

## **Venture Construction Solutions Ltd. Privacy Policy**

### **Introduction**

This Privacy Notice sets out the basis on which we use personal data in the course of our business activities.

We are Venture Construction Solutions Ltd, a company registered in England & Wales under company number 08030565. Unit L Radford Business Centre Radford Way, Billericay, Essex. CM12 0BZ and our address for correspondence is 60 New Broad Street, London, EC2M 1JJ.

As a business which relies upon having access to a database of pre-qualified Candidates to meet our Clients' requirements, data is essential to our business.

Our systems and processes are designed to ensure that we can provide the best possible service to our clients while operating within the law at all times and protecting individuals' data privacy rights.

We reserve the right to update this Privacy Notice from time to time. Where appropriate, we shall contact you to notify you of any material changes to the Privacy Notice. You should also refer to our website periodically so that you may access and view our updated Privacy Notice. This will ensure that you understand;

- i) How we are using your personal data and
- ii) Your legal rights around our usage of such personal data.

### **Who Should Read This Privacy Notice?**

This Privacy Notice applies to any living, identifiable individuals about whom we may process personal data in the course of our business activities.

You should read this Privacy Notice if you are a;

- Candidate
- Client Contact
- Supplier Representative

If you are an employee, you should refer to our internal Data Processing Policy instead.

### **How We Obtain Personal Data**

We obtain personal data from a number of different sources, depending on whether you are a Candidate, a Client Contact or a Supplier Representative.

If you are a Candidate, we may obtain personal data relating to you directly if you have;

- applied for a Client vacancy through us
- uploaded your CV through our website
- asked us to provide any work-finding services to you
- engaged with us through any networking activities or events
- had any discussions with us about finding alternative employment

Indirectly from;

- online professional networking sites such as LinkedIn
- social networking sites such as Facebook or Twitter
- job boards such as Total Jobs, CV Library, Careerstructure, Gumtree
- referees who provide information about your employment experience and their opinion as to your skills and aptitude
- your employer's website and other industry-related websites
- business information directories
- online industry databases such as the Construction Industry Training Board
- where appropriate, third-party background checking services such as the Disclosure & Barring Service

If you are a Client Contact or Supplier Representative, we may obtain personal data relating to you directly in the course of;

- us providing services to you or you providing services to us, as applicable

Or indirectly from;

- online professional networking sites such as LinkedIn
- your employer's website and other industry-related websites
- business information directories
- other individuals within your organisation in the course of us providing services to you or you providing services to us, as applicable.

### **Types of Information We Hold**

If you are a Candidate, we may collect, store and process the following types of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and email addresses;
- Your gender, date of birth, nationality and place of residence;
- Your professional skills and experience;
- Your qualifications, training and certifications;
- Proof of your right to work in the United Kingdom such as copies of your passport and, where applicable, visa, residence permit or similar government documents;
- Proof of your identity and address, such as copies of your driving licence, utility bills or similar documents;
- Information about your current or most recent role, including your job title, department, reporting line, responsibilities, salary, benefits and notice period;
- Your motivation and reasons for seeking new employment;
- Any information within your CV or any application document which a Client may require you to complete;
- Any background information which you provide to us during the course of your dealings with us;
- Details of any Clients to whom you have been introduced by us;

- Details of any interviews which you have attended and our Clients' feedback on those interviews;
- Details of any position which you take up with a Client, including your role, duties, remuneration, department and location;
- Where you provide any services on a freelance basis;
- Details of any limited company through which you contract and the nature of your relationship with that company;
- Information about the days and times which you have worked;
- Your bank details, tax code and National Insurance Number;
- Information about any services which you have carried out, including any comments, feedback and issues relating to such services.

We may also ask for your consent to collect, store and use the following "special categories" of more sensitive personal information

- Information about your race or ethnicity;
- Information about your health, including any medical condition, health and sickness records;
- Information about criminal convictions and offences.

If you are a Client Contact, we will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and email addresses;
- Your job title and position within the Client organisation;
- Any background information relating to your personal circumstances, your work history and the role which you perform within the Client which you may provide to us in the course of your dealings with us.

We do not collect, store or use any "special categories" of sensitive personal information if you are a Client Contact.

If you are a Supplier Representative, we will collect, store, and use the following categories of personal information about you;

- Personal contact details such as name, title, addresses, telephone numbers, and email addresses;
- Your job title and position within the Supplier organisation;
- Any background information relating to the role which you perform within the Supplier which you may provide to us in the course of your dealings with us.

We do not collect, store or use any "special categories" of sensitive personal information if you are a Supplier Representative.

### **How We Use Personal Data**

If you are a Candidate, we may use your personal data to;

- Assess and verify your potential suitability for employment with a Client;

- Contact you in relation to any potential employment opportunities with a Client;
- Introduce you to our Clients and potentially arrange for you to fill a Client vacancy;
- Stay in regular contact with you to understand your current position, career aspirations and motivation for finding new employment;
- Where applicable, make payments to you or arrange for any third-party company through which you may contract to make payments to you;
- Contact you to ask for a referral;
- Produce anonymised statistical data;
- Comply with our legal obligations, defend or bring any legal proceedings and prevent fraud or any other crime;
- Conduct equal opportunities monitoring.

If you are a Client Contact, we may use your personal data to:

- Contact you to obtain information about our Client's requirements;
- Liaise with you so that we may effectively perform the services to our Client;
- Obtain a reference for a Candidate;
- Contact you for invoicing and credit control purposes;
- Comply with our legal obligations, defend or bring any legal proceedings and prevent fraud or any other crime.

If you are a Supplier Representative, we may use your personal data to:

- Liaise with you in respect of the service which is being provided by the Client;
- Contact you in relation to billing matters;
- Comply with our legal obligations, defend or bring any legal proceedings and prevent fraud or any other crime.

### **Our Lawful Basis for Processing Data**

We have determined that we have a legitimate interest to process your personal data where you are:

- A Candidate, on the basis that it is necessary for us to maintain a database of individuals who are;
  - i) actively seeking new employment with a Client
  - ii) potentially suitable for employment with a Client.

By processing your personal data and contacting you from time to time, we are able to gain an understanding of your current role (where applicable), your skills and experience, and your career aspirations.

Our processing of your personal data is therefore of benefit to:

- i) You, as it assists us to identify new employment opportunities about which you might not otherwise been aware and to give general advice and guidance in support of your career development;

- ii) Our Clients, who rely on us to have access to suitable, pre-qualified candidates who can fill their requirements;
- iii) Us, as we are a commercial enterprise which relies upon being able to introduce Candidates to our Clients
- A Client Contact, on the basis that we need to be able to contact and interact with the individuals who are employed or engaged by our Clients. This will allow us to effectively provide services to them, better understand their requirements and generate revenue for our business.
- A Supplier Representative, on the basis that we need to be able to contact and interact with the individuals who are employed or engaged by our Suppliers. This will allow us to ensure that our Suppliers provide us with the best possible service which, in turn, is of direct benefit to both our Candidates and our Clients.

### **Where We Process Personal Data**

Your personal data is primarily held and processed by us in the United Kingdom. We may also use commercial-grade cloud storage services such as Microsoft OneDrive and Dropbox to store personal data relating to you.

These are international businesses which may securely process data anywhere in the world. They do not perform any other form of processing on our behalf and are not entitled to use any personal data which is controlled by us for any other purpose.

We have put in place appropriate safeguards to ensure that your data is only transferred to jurisdictions with enforceable data subject rights and effective legal remedies in respect of data privacy breaches.

In addition, we will only transfer personal data to jurisdictions outside of the EEA where

- There are binding corporate rules in place regarding the transfer of such data within the Group, in accordance with Article 47 of the GDPR;
- The European Commission has made an adequacy decision in respect of such jurisdiction;
- The transfer of data is subject to the model contractual clauses adopted by the European Commission;
- You have consented to the transfer of such data.

### **Parties with Whom We May Share Data**

If you are a Candidate, we may share your personal data with:

- A Client where you have expressed an interest in being introduced to such Client;
- Any third-party which is engaged by the Client to assist them in the recruitment process including a managed service company, Recruitment Process Outsourcing provider or IT services provider;
- A third-party company through which you are contracting;

- A third-party company to which you have specifically asked to be introduced or referred, such as an insurance company or intermediary (umbrella) company;
- Background checking services such as the Disclosure & Barring Service;
- Industry bodies such as the Construction Industry Training Board and any similar organisations which are relevant to the market sector in which you work;
- Third-Party Services Providers;
- Governmental departments and agencies where we are permitted or required by law to do so.

We may also share your personal data with Clients on an anonymised basis where we have agreed to provide general statistical information to such Clients.

If you are a Client Contact, we may share very limited data relating to you with a Candidate where such sharing is strictly required for the recruitment process e.g. so that the Candidate may contact you directly. We will also share your personal data with Third-Party Services Providers for legitimate business purposes.

If you are a Supplier Representative, we will share your personal data with other Third-Party Services Providers for legitimate business purposes.

### **Automated Decision Making**

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. All decisions which are made in the course of our business processes involve human intervention. We do not therefore expect to make any decisions about you using automated means, whether you are a Candidate, Client Contact or Supplier Representative.

### **Data Security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Data Protection Officer. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **Data Retention**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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.

Our standard data retention period is three years from the last date on which we are in actual contact with you i.e. where we actually speak with you or exchange correspondence.

After this time, if we are unable to contact you to update your details, we will usually delete your personal data from our records.

Where we are required to keep any information (i) for auditing or compliance purposes (ii) to comply with our contractual obligations to third parties or (iii) in respect of any potential or actual legal proceedings, we shall keep your data for as long as is strictly necessary for these purposes, which is typically for six years from the date on which the relevant business activities were carried out.

In some circumstances we may completely anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

### **Our Website**

If you interact with our website at [www.weareventure.co.uk](http://www.weareventure.co.uk), we may process information pertaining to such usage. For further information, please refer to our Website Privacy Policy & Cookie Notice at [www.weareventure.co.uk](http://www.weareventure.co.uk).

### **Rights of access, correction, erasure, and restriction**

**Your duty to inform us of** changes. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

**Your rights in connection with personal information.** Under certain circumstances, you have the right under the Data Protection Legislation to:

- Request **access** to your personal information (a Subject Access Request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. You will not usually have to pay a fee to access your personal information but we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Request **correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request **erasure** of your personal information. This enables you to ask us to delete or remove personal information where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed or you have objected to the processing and there is no overriding legitimate interest for continuing the processing.
- **Object** to processing of your personal information where we are relying on a legitimate interest and you object on “grounds relating to your particular situation.”

- Request the **restriction** of processing of your personal information. This enables you to ask us to block or suppress the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it or if you have also objected to the processing as above.
- Request the **transfer** of your personal information to another party when the processing is based on consent and carried out by automated means. This right is not applicable to any data processing carried out by Venture.

If you want to exercise any of the above rights, please contact the Data Protection Officer in writing. We will consider your request and confirm the actions which we have taken in response to such request.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is an appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. We will confirm the actions which we have taken in respect of any such request.

If you are unhappy with any aspect of the manner in which we have processed your personal data or dealt with your decision to exercise any of the rights set out in this section, you have the right to complain to the Information Commissioners Office in the United Kingdom. Their details are:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel: 0303 123 1113 (local rate)

Or, if you prefer to use a national rate number, 01625 545 745 Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

### Definitions

**Candidate** means a person who is registered with Venture Constructions Solutions Ltd as seeking or potentially seeking new employment or engagement. This includes individuals who are not actively seeking a new role but who would like to remain in contact with Venture Constructions Solutions Ltd about potential opportunities which may be of interest from time to time.

**Client** means a business which has engaged Venture Constructions Solutions Ltd to provide services or which Venture Constructions Solutions Ltd has identified as a business for which Venture Constructions Solutions Ltd wishes to perform services.

**Client Contact** means a person who is employed or engaged by a Client and with whom Venture Constructions Solutions Ltd may liaise in respect of any services which Skilled Careers is providing or wishes to provide to the Client.

**Data Protection Legislation** means (i) unless and until the GDPR is no longer directly applicable in the UK, the General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the GDPR or the Data Protection Act 1998.

**Supplier** means a business which provides services to Venture Construction Solutions Ltd and which may process personal data relating to any Candidate, Client Contact or Supplier Representative in the course of performing such services.

**Supplier Representative** means a person who is employed or engaged by a Supplier and with whom Venture Construction Solutions may liaise from time to time in respect of the services which are provided by that Supplier.

**Third-Party Services Provider** means any relevant third-party business which provides services to us, such as our;

- Professional advisers including accountants, tax advisors and lawyers
- Insurers;
- IT services providers and software providers;
- Independent consultants and subcontractors.

### **Contacting Us**

If you have any questions about this Privacy Notice, you can write to our Data Protection Officer at Venture Construction Solutions, 60 New Broad Street, London, EC2M 1JJ. Alternatively, you may telephone us on +44(0) 203 740 3304.