



## **Privacy and Cookie Policy**

This Privacy Policy sets out the data processing practices of NEVAS Consultants Limited, (NEVAS). Please note that all data thus captured will be used and held in accordance with the requirements of the Data Protection Act 2018 and the U.K. General Data Protection Regulations (GDPR). NEVAS is registered with the Information Commissioner's Office as a data controller, our registration number is: ZA071302

If you have any requests concerning your personal data or any queries with regard to how we handle your data you can contact: John Rae by phone 0207 849 3014, email [johnrae@nevas.co.uk](mailto:johnrae@nevas.co.uk) or write to us at Data Protection, NEVAS Consultants Limited, 60 St Martins Lane, Covent Garden, London WC2N 4JS.

Please read this Privacy and Cookie Policy carefully. If you do not accept these terms, then please stop using the Website and do not submit information through the Website.

You can unsubscribe at any time via the unsubscribe link at the bottom of marketing e-mails we may send you or you can contact us directly with your wishes by contacting: John Rae by phone on 0207 849 3014, email [johnrae@nevas.co.uk](mailto:johnrae@nevas.co.uk) or write to us at Data Protection, NEVAS Consultants Limited, 60 St Martins Lane, Covent Garden, London WC2N 4JS.

We update this Privacy and Cookie Policy regularly and we will post the new version online and we encourage you to review this Privacy and Cookie Policy from time to time to review any changes. We will inform you and seek consent, when we make major changes to this Privacy and Cookie Policy.

### **What information about you do we collect?**

When you register with us on our website or directly with an enquiry you provide us with and with the following personal information:

- Your name
- Your address
- Your telephone numbers
- Your e-mail address

When you contact us with regards to a work assignments or short term contact you provide us with the additional information:

- Your name
- Your address
- Your telephone numbers
- Your e-mail address
- Curriculum Vitae
- Occupation
- Identification documents
- Right to Work documents
- Educational records
- Work history
- Employment and references
- Interests

We may collect some sensitive information about you. Sensitive information is categorised as: racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, health data or data relating to natural person's sex life or sexual orientation. In general, we will not ask you about sensitive personal data but there may be times that it is necessary for information to be disclosed to us and for us to share that with potential employers. We will only share the information where you have provided your explicit consent.

We are also under an obligation with some of our clients to provide suitable candidates. Part of that assessment will include asking you about any unspent criminal convictions you may have and your financial status. We consider this to be highly confidential information and will only do so where you have provided your explicit consent.

We will also collect business cards, where offered at meeting.

## Data Sharing

We will share your information with the following:

**Suppliers, subcontractors** - we keep your information confidential, but may disclose it to suppliers or subcontractors insofar as it is reasonably necessary for the purposes set out in this privacy policy. However, this is on the basis that they have agreed to safeguard this information.

**Our service providers** - this includes external third-party service providers, such as accountants, auditors, experts, lawyers and other outside professional advisors; IT systems, support and hosting service providers; technical engineers; data storage and cloud providers and similar third-party vendors and outsourced service providers that assist us in carrying out business activities.

**Government authorities** - in addition, we may disclose your information to the extent that we are required to do so by law (which may include to government bodies and law

enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).

If we are involved in a merger, acquisition, or sale of all or a portion of our assets, you will be notified via email, account message and/or a prominent notice on our website of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

## **The legal basis on which we will rely**

NEVAS collect and process your personal data on the basis of different legal grounds depending on the personal data being provided and the type of processing being undertaken:

**Contract performance** – processing is necessary for us to administer the pre-contract and contractual relationship between ourselves and you, our suppliers; customers; potential employees in connection with the performance of a contract. Examples being, work placements, interpreter services, managing employees and contractors, fulfilling contractual obligations to a client.

**Legitimate interests** – other types of processing of your Personal Data is that it is necessary for the purposes of legitimate interests pursued by NEVAS and were we have assessed that the interests, rights or freedoms of the individual have not been overridden. The legitimate interest will include marketing of our products and services, where we believe you have a reasonable expectation that we will perform a particular type of processing on your behalf; where processing is strictly necessary for the prevention and detection of fraud.

**Consent** – will be relied upon in some situations where NEVAS process your personal information. We will request your explicit consent where we require it to process your personal information and this will be requested at the time the personal information is obtained. An example of this would be the collection of sensitive personal information.

**Compliance with a legal obligation** – processing is required to enable NEVAS to comply with its legal obligations. Examples of this would be, HR records, business records, fulfilling a contractual obligation.

### **1. Marketing**

We would like to use your personal data to send you details of products or services that we offer that we have identified as likely to be of interest to you. We will only send you information in line with the preferences you indicated when you provided the personal data.

If at any point you would like to opt-out of receiving communications from us, or would like to change the channels (such as email or post) that we use to contact you, please contact: John Rae by phone on 0207 849 3014, email [johnrae@nevas.co.uk](mailto:johnrae@nevas.co.uk) or write to us at Data Protection, NEVAS Consultants Limited, 60 St Martins Lane, Covent Garden, London WC2N 4JS.

## **2. Recipients/categories of recipients**

In carrying out our business including our obligations to you, we may use sub-contractors. These will be interpreters, payroll providers, accountants, email broadcasters, marketing agencies and other contractors. We will ensure that they respect your privacy and abide by all data protection laws.

## **3. Transfers to third countries**

As part of our processing activities we may transfer your personal data outside the United Kingdom and the European Economic Area. We will always ensure we have a written data processing agreement with these processors to ensure the same level of data protection in the United Kingdom will apply.

## **4. Retention periods**

We will keep your personal data in connection with the services and or products you have bought from us for 6 years after the last purchase. We need to retain this data for our own accounting purposes and for legal and tax purposes.

In terms of personal data, we use for marketing, we will keep this data for as long as we are able to market to you and if you withdraw your consent or opt-out of marketing communications, we will keep your contact details only to ensure that we do not contact you again for marketing purposes.

Where you have provided us with your CV we will keep this on file for 1 year from the last contact in relation to temporary work assignments and in relation to interpreters and contractors, for 3 years.

## **5. Data subject's rights**

You have rights in respect of your personal data. We will need to confirm your identity before we can consider your request so, if you wish to exercise any of these rights, we will need you to confirm you are the data subject by providing photo ID and residency documentation, (i.e. a passport, driving licence, utility bill, bank statement).

**The right to be informed** – you have the right to be told about the collection and use of the personal data you provide. This privacy policy sets out the purpose for which we process your personal data, how long we will keep your data, who we will share your data with. If you have any questions on how and why we process your data, please contact: [johnrae@nevas.co.uk](mailto:johnrae@nevas.co.uk) or write to us at Data Protection, NEVAS Consultants Limited, 60 St Martins Lane, Covent Garden, London WC2N 4JS.

If you want to know more about this right, the Information Commissioner's Office (ICO) has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed/>

**Right of access** – you have the right to know whether we are processing your personal data, and to a copy of that data. We would need as much information as possible to enable us to locate your data. We will respond to your request within 28 days of receipt of your request. If you want to exercise this right, please contact the John Rae at the contact details above.

If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/>

**Right to rectification** – you have the right to have any incorrect personal data corrected or completed if it is incomplete. You can make this request verbally or in writing. We will need as much information as possible to enable us to locate your data. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact John Rae at the contact details above.

If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-rectification/>

**Right to erasure** – this right, often referred to as the right to be forgotten allows you to ask us to erase personal data where there is no valid reason for us to keep it. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact John Rae at the contact details above.

If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-erasure/>

**Right to restrict processing** – you have the right to ask us to restrict processing of your data. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact John Rae at the contact details above.

If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-restrict-processing/>

**Right to data portability** – you have the right to move, copy or transfer your personal data from one IT environment to another. This right applies to data that you have provided to us and that we are processing on the legal basis of consent or in the performance of a contract and that processing is by automated means. We will respond to your request within 28 days of receipt of your request. If you want to exercise this right, please contact John Rae at the contact details above.

If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-data-portability/>

**Right to object** – you have the right to object to our processing of your personal data based on (i) legitimate interests, or for the performance of a task in the public interests/exercise of official authority (including profiling); (ii) direct marketing (including profiling); and (iii) for purposes of scientific/historical research and statistics.

- (i) Legitimate interests/legal task – your objection should be based on your particular situation. We can continue to process the data if we can demonstrate compelling legitimate grounds which override your interests.
- (ii) Direct marketing – you have an absolute right to ask us to stop processing for the purposes of direct marketing. We will action your request as soon as possible.
- (iii) Scientific/historical research and statistics - your objection should be based on your particular situation. If we are conducting research where the processing is necessary for the performance of a public task, we can refuse to comply with your objection.

If you want to exercise this right, please contact John Rae at the contact details above.

If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-object/>

**Rights relating to automated decision making including profiling** – you have the right in respect of automated decision making, including profiling. Where we carry out solely automated decision making, including profiling, which has legal or similarly significant effects on you, we can only do this if it is in connection with a contract with you, we have a right under law or you have provided your explicit consent. We will tell you if this happens and tell you how you can request human intervention or challenge the decision. If you want to exercise this right, please contact John Rae at the contact details above.

If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/rights-related-to-automated-decision-making-including-profiling/>

## **6. Processing based on consent**

Where we process your personal data based on your consent you have the right to withdraw that consent at any time without reason. You can opt-out by using the unsubscribe/opt-out in any marketing we send you and you can contact John Rae at the contact details above.

## **7. The right to lodge a complaint to the supervisory authority**

If you are unhappy with any aspect of our handling of your data, you can make a complaint to the Information Commissioner's Office - <https://ico.org.uk/concerns/>

### **8. Statutory/contractual requirement to provide personal data.**

The personal data that you provide to us is necessary for us to carry out the contract you have entered into with us or for us to perform our obligations under Statute. The personal data this refers to is the data collected in relation to contractors, interpreters and temporary workers and if you request that we do not process your data, we will not be able to offer you work assignments.

### **9. Automated decision making including profiling**

We do not process your data in this manner.

### **10. Cookies.**

A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information from the browser. Find out more about cookies on <http://www.allaboutcookies.org/>

We use cookies to identify you when you visit this website and to keep track of your browsing patterns and build up a demographic profile.

Our use of cookies also allows registered users to be presented with a personalised version of the site, carry out transactions and have access to information about their account. Most browsers will allow you to turn off cookies. If you want to know how to do this, please look at the menu on your browser or look at the instruction on <http://www.allaboutcookies.org/> Please note however that turning off cookies will restrict your use of our website.

#### **Cookies we use**

Cookie	What it does	How to disable and consequences
Google	<a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a> <a href="https://policies.google.com/privacy/key-terms?hl=en#toc-terms-account">https://policies.google.com/privacy/key-terms?hl=en#toc-terms-account</a>	Please refer to Googles privacy and cookie polices

### **11. Third party websites.**

Our website may contain links to other websites that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours.

### **12. Changes to the privacy policy.**

This privacy policy is regularly reviewed and will be updated when necessary. If we make any significant changes to this policy, we will communicate these to you.

**Last Updated January 2021**