

David Goldstone Associates Limited T/A Goldstone Associates - PRIVACY POLICY

Goldstone Associates is committed to protecting the privacy of our candidates, clients, and users of our website. We will ensure that the information you submit to us is only used for the purposes set out in this Privacy Notice.

Your rights are set out in this notice. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

This is the Privacy Notice of David Goldstone Associates Limited T/A Goldstone Associates of 107 Bell Street, London, England, NW1 6TL (Registered Company Number: 11018142) (“Goldstone Associates Limited” or “we” or “our” or “us”). We are a “controller” for the purposes of the UK General Data Protection Regulation and Data Protection Act 2018 (collectively referred to as “**Data Protection Laws**”).

We respect your privacy, and we are committed to protecting your personal data. This privacy notice will inform you (where you are acting in your capacity as a user of our services (“user”); or as a representative of a business or organisation that interacts with us (“Business Contact”) as to how we use and look after your personal data, when you:

- (1) Visit our website (“Website”); or
- (2) Interact with us (whether that is through phone, email, online contact forms, letter, meetings, or other communications (for simplicity, we refer in this privacy notice to all such communication methods as being made via the “Channels”).

We refer to the Website or Channels as each being “Communication Channels” in this privacy notice. We refer to interactions between you and us via the Communications Channels as “Communications”.

This privacy notice also tells you about your privacy rights and how the law protects you.

Purpose of this privacy notice

This privacy notice provides information on how Goldstone Associates collects and processes your personal data, via the various Communications. This privacy policy also tells you about your privacy rights and how the law protects you.

It is important that you read this privacy notice, together with any other privacy notice or fair processing notice which we may make available to you, when we are collecting or processing personal data about you, so that you are aware of how, and why, we are using your personal data.

Controller

Goldstone Associates is the controller in respect of the personal data which you make available via the Communication Channels.

We have appointed a Data Protection Officer, (“DPO”), who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our DPO using the details set out below.

Contact details and complaints

Full name of legal entity: David Goldstone Associates Limited T/A Goldstone Associates

Contact Name: David Goldstone.

Email address: apply@goldstoneassociates.com

Postal address: David Goldstone, 107 Bell Street, London, England, NW1 6TL.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

David Goldstone Limited is registered as a Data Controller with the Information Commissioner's Office Certificate Number ZA758515.

Changes to the privacy notice and your duty to inform us of changes

The latest version of the Privacy Notice can be found here on our website at <https://www.davidgoldstone.com>. We will alert you on our website when any changes are made.

It is important that the personal data which we hold about you, is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third party links

Our Website may include links to third party websites, plug-ins, cookies, media and applications. Clicking on those links, or enabling those connections, may allow third parties to collect or share data about you. We do not control those third-party websites, and we are therefore, not responsible for their privacy notices. When you leave our Website, we encourage you to read the privacy notice of every website which you visit to ensure that your data is processed in a safe, secure manner.

The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect the information necessary to be able to understand your experience and eligibility for available opportunities that might arise. This information may include CVs, identification documents, educational records, work history, employment and references.

We may also collect sensitive personal data about you, such as about your personal circumstances, your family situation, data concerning your health and political views and activity. We only collect sensitive personal data from you, and further process this data, where you have given your explicit consent.

Special Categories of Personal Data We do not collect, nor process, any information about criminal convictions and offences, in the context of the scope of what this privacy notice relates to.

How is your Personal Data Collected?

We use different methods to collect data from and about you, including through:

Direct interactions: You may give us your personal data by using the Communication Channels. This includes personal data which you provide when you:

- Search for or submit/discuss with us a new opportunity and/or during the recruitment process; or
- Through publicly available sources. We use the following public sources, such as LinkedIn, or
- By reference or word of mouth. For example, you may be recommended by a friend, a former employer, a former colleague or even a present employer; or
- **Automated technologies or interactions:** As you interact with our Website, we may automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our Cookies Policy for further details

How we use your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- For contractual purposes, i.e. using your personal data to match your skills and experience with a potential employer.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Generally, we do not rely on consent as a lawful basis for processing your personal data, other than in relation to sending direct marketing communications to you.

You have the right to withdraw consent at any time, by contacting us.

Legal Basis

- Performance of Contract as a lawful basis, involves processing your data, where it is necessary for the performance of a contract, to which you are a party, or to take steps at your request, before entering into such a contract.
- Comply with a legal or regulatory obligation as a lawful basis, involving processing your personal data, where it is necessary for compliance with a legal or regulatory obligation.
- Consent as a lawful basis, involving processing your personal data where you have freely provided your consent. You may withhold or withdraw consent at any time, with no detriment to you as a result.

Marketing

We may use your Identity Data, Contact Data, Usage Data, Profile Data, Marketing and Communications Data for marketing purposes in respect of our services, provided that you have opted into receiving such marketing communications (in circumstances in which we have confirmed, that we are not relying upon legitimate interests as our lawful basis, for processing your personal data for such purposes).

Opting out

You can ask us to stop sending you marketing communications at any time, by selecting the opt-out links on any marketing communications sent to you, or by contacting us at any time. You also have a separate right to object to marketing, where we are using legitimate interests for such processing, and this can be exercised by contacting us.

Cookies

You can set your browser to refuse all, or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Website may become inaccessible or not function properly. For more information about the cookies which we use, please see our Cookie Policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose.

Disclosures of your Personal Data

We may share your personal data with the parties set out below, for the purposes set out in this Privacy Notice.

- Third parties who are professional advisors to our business or deal with the enforcement of our legal obligations, for example, lawyers, accountants, auditors, or regulatory authorities.

We require all third parties to respect the security of your personal data, and to treat it in accordance with the law. We do not allow our third-party service providers who are acting as our processors, to use your personal data for their own purposes, and we only permit them to process your personal data for specified purposes and in accordance with our instructions.

International Transfers

We do not transfer your personal data outside the UK or European Economic Area ("EEA").

Data Security

We have put in place appropriate security measures, to seek to prevent your personal data from being accidentally lost; altered, used, accessed, or disclosed, in an unauthorised way. We have put in place procedures to deal with any suspected personal data breach, and we will notify you and any applicable supervisory authority, of a personal data breach, where we are legally required to do so.

Data Retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary, to fulfil the purposes which we collected it for.

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.

We keep your personal data in accordance with the following retention arrangements (unless we state otherwise).

- Candidate data: For three (3) years from the date of us processing your data.
- Client data: For five (5) years from the date of us processing your data.
- Complaints data for seven (7) years following the resolution of the complaint.

In some circumstances, you can ask us to delete your data: see 'Request erasure' below, for further information.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

With regard to all of our retention arrangements, should a dispute or legal claim arise in respect of any matter, then we will retain the personal data related to that dispute or claim, until the resolution of that dispute or claim, and for a further period to reflect the applicable statutory limitation period.

Your Legal Rights

Under certain circumstances, you have rights under data protection laws, in relation to your personal data. You have the right, by law, to:

- **Request access to your personal data** commonly referred to as a data subject access request. This enables you to receive a copy of the personal data which we hold about you.
- **Request correction** of the personal data which we hold about you. This enables you to have any incomplete or inaccurate data, which we hold about you corrected, though we may need to verify the accuracy of the new data which you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove your personal data. You also have the right to ask us to delete or remove your personal data, where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully, or where we are required to erase your personal data to comply with local law.
- **Object to processing** of your personal data. You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities).
- **Request restriction of processing** of your personal data. Where processing is restricted, we can still store your information, but may not use it further.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party of your choice, your personal data in a structured and machine-readable format. This right only applies to automated information, in respect of which you initially provided consent for us to process the personal data, or where we processed the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide services to you. We will advise you, if this is the case at the time that you notify us that you are withdrawing your consent.

If you wish to exercise any of the rights set out above, please contact us.

Fees

You will not have to pay a fee to access your personal data, however, we may charge a reasonable fee, if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you, to help us confirm your identity and ensure your right to access your personal data. This is a security measure, to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you, to ask you for further information in relation to your request, to help us process your request.

Time limit to respond

We try to respond to all legitimate requests within 30 calendar days. Occasionally, it may take us longer than this, if your request is particularly complex, or if you have made several requests. In this case, we will notify you and keep you updated.