

## Sopra Steria Recruitment Privacy Notice for candidates and contractors

### Data Controller

For the purposes of the processing activities covered in this Notice the Data Controller is Sopra Steria Recruitment Ltd.

**Our Data Protection Officer** is Peter Cashmore - email; [DPO@soprasteria.com](mailto:DPO@soprasteria.com).

We can be contacted by email at [contact.recruitment@soprasteria.com](mailto:contact.recruitment@soprasteria.com), by telephone on 0370 600 4466 or in writing the following address:

Sopra Steria Recruitment Ltd  
Three Cherry Trees Lane  
Hemel Hempstead  
Hertfordshire  
HP2 7AH

### Purpose of and Justification for Processing

#### 1 REGISTRATION – PROCESSING ON THE BASIS OF OUR LEGITIMATE INTERESTS AND TO TAKE STEPS FOR THE FORMATION OF A CONTRACT

Your information is being processed for the purposes of providing recruitment services to both you and our clients. The information we keep includes your CV (where you have provided this) and answers to on-line questionnaires. This information enables us to assess your work related capabilities, experience and location and determine if you would be a suitable candidate for our clients' requirements. Where a potential match is determined the contact information we hold also allows us to get in touch with you to discuss this.

We will not use your data for the purposes of automated decision making, including profiling, without first informing you of this.

During the registration stage, we are processing your data on the basis of our legitimate interests and in order to take steps to enter into a contract under which you will provide services to our client.

#### 2 PLACEMENT – PROCESSING ON THE BASIS OF OUR LEGITIMATE INTERESTS AND TO TAKE STEPS FOR THE FORMATION OF A CONTRACT

The process of placing you as a candidate begins with your granting us the Right to Represent you and to communicate your personal information to the client(s) you agree for the purpose of seeking interviews on your behalf. At this stage, which may include vetting, we may ask you to disclose further information as requested by client(s).

Right to Represent is obtained from you on a role by role basis and does not persist beyond this.

During the placement stage we continue to process your personal information on the basis of our legitimate interests and in order to take steps to enter into a contract to provide your services to our client.

### **3 ENGAGEMENT – PROCESSING ON THE BASIS OF OUR LEGITIMATE INTERESTS AND TO TAKE STEPS FOR THE FORMATION OF A CONTRACT**

Once a Client seeks to engage you to provide services we will contact you and/or your Personal Services Company or chosen Umbrella Company to confirm your agreement to a contract for those services with us. Upon such agreement we will also sign a contract with the Client (or a third party acting for the Client) for the provision of your services. In order to comply with our contract with the Client, and with statutory requirements on us as an Employment Intermediary, we may ask you for additional information.

At the stage of engagement and thereafter we will be processing your personal information on the basis of one or more of the following:

- our legitimate interests in performing our contracts with your Personal Services Company or Umbrella (such as, for example, making payment to you and administering renewals), and
- for the purposes of performing a contract for the provision of your services to our client; and
- for the purposes of performing a contract for the provision of your services with your chosen Personal Services Company or Umbrella; and
- for compliance with legal obligations on us (such as, for example, making statutory returns to HMRC).

We may also process your personal data where allowed by law, for example, to protect your vital interests.

### **4 ENGAGEMENT – PROCESSING BY OR ON BEHALF OF THE CLIENT**

During your engagement with a Client the Client is the Data Controller for all purposes connected with the Assignment set out in the Assignment Schedule, which forms part of the contract for your services between ourselves and your Personal Service Company / Umbrella. For these purposes, we will process your personal data under the Client's instructions.

All enquiries relating to processing of personal data by the Client should be directed to the Client at the address set out in the Assignment Schedule.

### **5 FOLLOWING AN ENGAGEMENT**

After your engagement is ended we may require to continue to hold and process your personal data for the following purposes:

- To comply with legal obligations on us
- To enable resolution of any outstanding disputes; and
- Under our legitimate interest in continuing to hold your data for the purpose of finding you further engagements

And we may periodically ask you to update your personal data where this is the case.

## Categories of Personal Data

### 1 REGISTRATION

In order to make the assessments referred to under **Registration** above, and to contact you, we need to hold and process personal data as defined under the General Data Protection Regulation. This data may include :

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Current work location(s)

### Special Category Data

We do not ask for or need data which is considered under the General Data Protection Act as Special Category Data to match you against client requirements. This category includes data such as

- your racial or ethnic origin,
- your political opinions,
- your religious beliefs or other beliefs of a similar nature,
- whether you are a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992),
- your physical or mental health or condition,
- your sexual life,
- the commission or alleged commission by you of any offence, or
- any proceedings for any offence committed or alleged to have been committed by you, the disposal of such proceedings or the sentence of any court in such proceedings.

Should you choose to provide any of the above Special Category Data (eg on your CV) this will be retained on your original correspondence, but it will not be recorded elsewhere on our systems and will not be used as the basis for any assessment of your suitability. It may however be used at later stages, as described below.

### Diversity

Please note that any diversity surveys we undertake are not mandatory and the answers given will not form part of your record, but stored in a completely anonymised manner through which you cannot be identified. This anonymisation means it falls outside of the GDPR as it cannot be related back to you.

## **2 PLACEMENT**

If submitted for a role or placed subject to contract there may be a requirement to provide further personal data, without which your application or placement will not be able to proceed. This may include, but is not limited to

- information contained in documents produced as evidence of your right to work in the UK,
- proof of identity,
- proof of address,
- National Insurance Number,
- the report certificate from any financial or criminal checks required by the client
- your relationship with your Personal Service Company or other intermediary through which you provide your services, and with other persons involved in it.

When we submit your personal data to Clients, their use of it will also be subject to their own Privacy Notices and you should refer to these for details.

## **3 ENGAGEMENT**

To proceed with an engagement we will provide to a Client who wishes to engage your services all personal data we hold about you which we feel is relevant to the engagement, except that we will not provide Special Category Data unless either you specifically consent, the Client demonstrates a legitimate interest in processing such information, or such processing is for another lawful purpose.

We will, but only if you specifically request it, provide to a Client all or such part as you agree of any information we hold related to health or disability in order to request the Client to make reasonable adjustments to assist you in performing your duties.

A Client may request you to provide additional information for its purposes, and we may process such data on its behalf and under its authority.

We may request additional information from you in order to perform our contract with your Personal Service Company or chosen Umbrella.

## **Recipients**

### **1 REGISTRATION**

When you register but before you grant us the Right to Represent, your personal data will only be processed via

- our group internal systems provided by Sopra Steria Groupe SA on behalf of all its subsidiaries including Sopra Steria Recruitment Ltd.

All this processing takes place either in the EU or under contract between Sopra Steria Groupe and the relevant provider, which incorporates the required safeguards

- our Indian affiliate Steria India Pte Ltd, with whom we have a Data Transfer Agreement incorporating the Model Clauses approved by EEC Commission Decision 2010/593 as providing an adequate level of protection for your personal information.

When you grant us Right to Represent your personal data will additionally be shared with all the Clients you agree.

## **2 PLACEMENT**

During the Placement and Engagement process your data will also be processed by the Client under their own Privacy Notice.

During the Placement process we may also be required to share your personal data with third parties, including but not limited to;

- Your referees
- Vetting and similar agencies

Hosted solutions used in our workflows may include;

- PeopleFluent
- FieldGlass

## **3 ENGAGEMENT**

During an engagement we may pass information supplied by you to

- the Client
- Your personal service company or umbrella
- HMRC where required by law
- A PAYE payrolling sub-contractor.
- Third parties to whom the client requires us to supply information, such as a primary recruitment company appointed by our Client to oversee all candidate submissions.

### **Retention**

We will retain your information until

- you inform us that you are no longer seeking work through us,
- You instruct us to stop processing,
- Two years have elapsed since our last contact with you.

Should you be referred to a client but not placed, we may retain your information for not less than 9 months after our final correspondence relating to your application, based on a legitimate interest relating to The Equality Act 2010.

Should you be placed by us we may retain information relating to the placement for 6 years following the final transaction or correspondence, with you or our Client, which directly relates to that placement, based on

- a legal obligation to retain records relating to financial transactions under the VAT Act 1994.
- a legitimate interest relating on the Limitations Act 1980.

## **Rights**

You can, at any time, request

- confirmation that we are processing your personal data,
- access to your data,
- rectification of your data,
- erasure of your data,
- restriction of processing of your data or raise an objection to such processing,
- to transfer your data to another controller.
- Information about the existence of automated decision-making, including profiling, and, where relevant
  - meaningful information about the logic involved,
  - the significance and the envisaged consequences of such processing.

Any Subject Access Requests should be sent to [ssr.requests@soprasteria.com](mailto:ssr.requests@soprasteria.com).

For any other information please contact us at [contact.recruitment@soprasteria.com](mailto:contact.recruitment@soprasteria.com).

## **Requests to Stop Processing**

Our processing of your personal data is based mainly on our legitimate interests and performance of our legal obligations. You may request us to stop processing your data or transfer your data to a third party, but:

- In the cases set out in the Processing and Retention sections above and in other permitted cases we may not be able or obliged to comply with such a request.
- Such a request may not be granted during the currency of an assignment (including any extension) or where we have a legal right to restrict you from contracting with a third party;

Should you wish us to stop processing your data a request can be sent to [recruitmentcvunsubscribe@soprasteria.com](mailto:recruitmentcvunsubscribe@soprasteria.com)

## Source

The information referred to in this Privacy Notice is obtained from

- Job boards to which you have posted your Personal Data
- A directly submitted CV
- Referral from a client
- Social or professional media platforms

## Statutory or Contractual Requirements or Obligations

At the point of registration there is no obligation to provide information.

If submitted for a role or placed there may be a requirement to provide further information, without which your application or placement will not be able to proceed. This information may include, but is not limited to

- right to work in the UK,
- proof of identity,
- proof of address,
- proof of any special qualifications required for the role,
- National Insurance Number,
- the report certificate from any financial or criminal checks required by the client.

## Automated Decision Making

We do not use any automated decision making. We may use computer based professional capability assessments from which a score is recorded. You are not obliged to take these assessments.

## Complaints

Should you have a complaint about anything related to how we hold or process your personal data we would very much like to hear directly from you. You also have the right to complain directly to the Information Commissioner's Office.

SSR Complaints should be emailed to [contact.recruitment@soprasteria.com](mailto:contact.recruitment@soprasteria.com) or sent in writing to the address given under the Data Controller section of this document.

ICO Complaints

The ICO can be contacted on their helpline, 0303 123 1113, or through their website at <https://ico.org.uk/concerns/>.