

## Privacy Notice

Pario Partners is an Executive Search and Consultancy business which provides search and workforce planning services. We have to process personal data (including sensitive personal data) so we can provide these services – in doing so, the Company acts as a data controller. Within this Privacy Notice we use the term ‘Individual’ to mean different types of Data Subject for which we hold or process data. A Data Subject is a living individual to whom the personal data relates. Organisations are not data subjects.

An Individual may give personal details to the Sensible Staffing directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing an Individual’s personal data. For the purposes of providing work-finding services and/or information relating to roles relevant to Individuals we will only use personal data in accordance with the terms of the following statement.

An Individual can opt-out from receiving marketing information and news via email/ text at any time by clicking “unsubscribe” or by sending an email to; [info@sensible-staffing.com](mailto:info@sensible-staffing.com).

## Collection and use of personal data

### Purpose of processing and legal basis

Pario Partners will collect personal data (which may include sensitive personal data) and will process this personal data for the purposes of providing work-finding services. This includes for example, contacting Individuals about job opportunities, assessing suitability for those opportunities, updating our databases, putting Individuals forward for job opportunities, arranging payments to Individuals and developing and managing our services and relationship with Individuals and our clients.

In some cases we may be required to use data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use information during the course of internal audits to demonstrate our compliance with certain industry standards.

The legal bases we rely upon to offer these services are:

- An Individual’s consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with an Individual

### Legitimate interest

Pario Partners has legitimate reasons to process Individuals data where we believe it is reasonable and would not go against what an Individual would reasonably expect from us. Where we have relied on legitimate interest to process personal data, our legitimate interests are as follows:

- Managing our database and keeping Individuals records of their availability and the type of work they are looking for up to date;

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- Providing work-finding services to the Individuals, including sending their information to clients where they have demonstrated an interest in doing that particular type of work but not expressly consented to passing on their cv;

### Recipient/s of data

Pario Partners will process personal data and/or sensitive personal data with the following recipients:

- Clients that we introduce or supply Individuals to, for example; hospitals, care homes, local authorities, private healthcare companies (NB this list is not exhaustive)
- Employer organisations with regards to employment references
- Third parties who carry out audits, for example representatives of the NHS Framework agreements or other client auditors
- Umbrella companies that we pass Individuals data to for payment purposes
- Other recruitment agencies in the supply chain (e.g. master/neutral vendors and second tier suppliers);
- Our insurance providers, legal providers and other professional advisors
- Our Information Technology providers i.e. our IT Support Company
- Any public information sources and third party organisations that we use to carry out suitability checks on work-seekers e.g. Companies House, the Disclosure and Barring Service (DBS), Regulatory Bodies e.g. Nursing and Midwifery Council (NMC), independent training and occupational health providers
- Government, law enforcement agencies and other regulators e.g. the Police, Home Office, HMRC, Employment Agencies Standards Inspectorate (EASI), Local Authority Designated Officers
- Any of our group companies.

### Statutory/contractual requirement

We will share personal data where it is required by law and/or a contractual requirement (e.g. our client may require this personal data), If an Individual does not give us personal data we need to collect we may not be able to continue to provide work-finding services in those circumstances.

### The data we usually collect and how we collect it

Pario Partners will collect different types of data. Although its not an exhaustive list, the types of data we would collect would usually include:

#### Personal data

- Name, address, mobile no., email
- National insurance no.
- Banking and payment details
- Pre-employment & right to work checks, including training certificates and references

#### Sensitive personal data

- Sensitive pre-employment checks i.e. health information and criminal records history

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### Source of the personal data

Sometimes we collect data from the Individual and sometimes we can collect data from other sources. These sources can include;

- Various CV databases, jobs boards and social networks where we believe there is a legitimate interest
- Where a Friend or colleague has recommended you and we believe there is a legitimate interest
- A former employer, usually for a reference
- Cookies on our website

### Overseas Transfers

Pario Partners may transfer information Individuals provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

### Data retention

The Company will retain personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time.

The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep Individuals 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 payroll records, holiday pay, sick pay and pension 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 consent to process personal and sensitive personal data, we will do so in line with our retention policy which is available on request. Upon expiry of that period the Company will seek further consent from the Individual. Where consent is not granted the Company will cease to process the data.

### Cookies

We may obtain data from cookies. These are small text files that are placed on an Individuals computer by websites. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies also enable us to deliver more personalised content.

Most web browsers allow some control of most cookies through the browser settings. Please note that in a few cases some of our website features may not function if cookies are removed from the internet browser.

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### Internet Log Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

### Links to external websites

Pario Partner's website may contain links to other external websites. Please be aware that we are not responsible for the privacy practices of such other sites. We encourage Individuals to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by our website.

### Your rights as an Individuals

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

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

Individuals have the right to withdraw change their preferences at any time by contacting Pario Partners at [info@pariopartners.com](mailto:info@pariopartners.com)

There may be circumstances where the we will still need to process data for legal or official reasons. We will inform any affected individuals or work-seekers if this is the case. Where this is the case, we will restrict the data to only what is necessary for the purpose of meeting those specific reasons.

If an Individual believes that any of the data that the Company processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary. Individuals can also contact us using the above details if they want us to restrict the type or amount of data we process, access their personal data or exercise any of the other rights listed above.

### Data Security

Pario Partners takes every precaution to protect Individuals information. We have in place various measures in relation to the personal data processed to protect it. These are firewalls, browser



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certification technology, encryption, limited access and use of passwords. Only employees who need the information to perform a specific job (for example, recruitment consultants and our accounts staff) are granted access to your information.

We use all reasonable efforts to safeguard personal information. However, an Individual should be aware that the use of technology is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred via email/the Internet. Where a shared device is used we recommend that Individuals do not select the “remember my details” function when that option is offered.

Questions about the security can be sent to Joseph Dumont, [info@pariopartners.com](mailto:info@pariopartners.com)

### Changes to this privacy statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify Individuals.

### Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact:

Joseph Dumont, [info@pariopartners.com](mailto:info@pariopartners.com)

You also have the right to raise concerns with 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.