

HR Now Privacy Notice

HR Now takes your privacy very seriously and is committed to protecting your personal information. This privacy policy sets out the way in which any personal information you provide to us is used and kept secure by HR Now. It applies whenever we collect your personal data (including when you use our website or other digital platforms), so please read it carefully. We are Cyber Essentials accredited.

Our business

HR Now Ltd, company number 75364, is registered in Jersey, Channel Islands.

Data protection officer

Although the nature of our business doesn't oblige us to appoint a Data Protection Officer (DPO), we do have a central point of contact for data protection queries. The best means of contact for data protection queries is via email becky@hrnow.je or by phone on 01534 747559. If you have any questions or concerns regarding how we work with personal data, please don't hesitate to contact us.

The data we process

We store and process only the data that we need, and we delete it when it's no longer required. The primary collections of data we use are as described below. We don't pass this data to anyone else without your express written consent. Your data is stored on Microsoft Office 365 which is primarily in Ireland. If you'd like more details, you're welcome to get in touch.

Microsoft's Office 365 privacy notice is available at: <https://www.microsoft.com/en-us/TrustCenter/Privacy/default.aspx>

Purpose for processing Data

We process data for two distinct data subject groups – employees of HR Now and employees of HR Now's clients

HR Now Employee Data

We store and process personal data on our employees so that we can run the company and pay people. Thus we have a contractual basis for doing so. This will include names, contact details, pre-employment screening, performance and disciplinary data, general health information, salary and benefit details and bank details. It will also include the CV provided by the employee, next of kin information. If specific medical information is required it will only be obtained and processed with express consent. We do not use automated decision-making tools.

Employee Data for clients of HR Now

We will store and process personal data in the same way as we have described above for HR Now Employee Data. This data will be provided to HR Now by our client. The data we process is therefore on behalf of our client where HR Now are the data processor and our client, the Employer, remains the data controller.

HR Now will generally only obtain and process data necessary for the purpose of full filling the contract between HR Now and our client. This may include personal sensitive data if we are engaged to work with third parties for pre-employment screening, if so you will be aware and consent.

This may also include,

1. CV data or test result data for recruitment and selection purposes
2. performance and disciplinary data if we are engaged to support such processes

3. sickness absence, potential disability or impairment data and wider medical history or diagnosis of health data if we are engaged to support a capability or absence management process
4. technical competencies, appraisals, reviews or other individual performance data if we are required to support performance management issues
5. individual skills scores or technical competencies if we are supporting a development plan, wider talent management process or wider strategy for training budgets and planning process
6. baby due dates and any health related issues regarding maternity or baby birth health concerns regarding IVF, maternity leave, parental leave, surrogacy or adoption arrangements for clients
7. any death certificates or medical certificates and next of kin data regarding death in service benefits or to process benefits for next of kin
8. contractual data and pay data, benefits data, bonus data or pension data if we are required to consult on potential redundancies or run a redundancy process or a reward review process
9. evidence and statements and witnesses and other factual performance measurements if we are required to support a grievance, bullying or harassment issue or a potential discrimination claim process
10. On rare occasions we may hold health information for legitimate interests, for example if an employee was diabetic or if employers are required "epi-pens" regarding allergies.
11. Where we provide a payroll function for the client, we will also hold salary and benefit information, social security, income tax and bank details.
12. We may need to share personal data with third parties, for example, benefit providers, insurance companies, lawyers, regulators and other professional advisers.

Sharing any sensitive personal data beyond HR Now will only be done with express consent. We do not use automated decision-making tools.

Transferring Data

We do not transfer data outside of the EU without consent.

Client data

We store and process client data in order that we can correspond with, and process invoices to, our clients. When we have not done business with a client for ten years or longer, we will delete all data from our systems.

Marketing data

Where we use data for marketing we ask for your consent to do so. We keep a record of that consent for as long as you choose to receive that data.

Data Processors

Data processors are third parties who do work on our behalf using personal data we provide to them. They cannot do anything with your personal data unless we instruct them to do so (which includes sharing your data with others), and they must store the data securely and delete it when it is no longer required. Examples of where we use third party data processors are; for pre-employment screening and assessment and to run payroll.

Outsourced IT support

Our IT systems are managed by an external agency, Focused IT Limited, Jersey. As you would expect, the contract between us and our IT support partner contains appropriate clauses regarding information security and data protection, and we carry out regular service reviews.

Marketing

Our marketing comprises external support. As with our outsourced IT support, the agreement between us is compliant with data protection. Your data is not transferred to their systems.

Newsletter/Ticketing marketing

Upon occasions, we use Mail Chimp and the Eventbrite ticketing system to manage our client mailing lists.

Mail Chimp's privacy notice is at: <https://mailchimp.com/legal/privacy/>

Eventbrite's privacy notice is available at, https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_GB

Information security

All our computer systems are encrypted and run up to date anti-virus software. System updates are applied regularly to protect against potential security problems.

Security on mobile devices

All our laptops' hard drives are fully encrypted, so the data held on them is safe should one be lost or stolen. Our staff have access to their work email from their mobile phones, which we secure with a Mobile Device Management system, so we can remotely wipe any device if it is lost or stolen.

Our Website

HR Now uses Google Analytics to collect standard log information, along with data about how people use our website. More information about how Google Analytics is used can be found here:

<http://www.google.com/analytics/learn/privacy.html>

We use cookies on our Web site, both to make it work and to provide a good customer experience. You can tweak the settings in your browser to suit your privacy preferences.

Social media

We use LinkedIn and Twitter to post news and information, and to look at the profiles of people who apply for employment with us. We don't use social media to, for example, build mailing lists. We don't share data obtained through social media with anyone else.

People who email us

We use Microsoft Office 365 for our emails. Please note that you have a responsibility to ensure that any email you send us is within the bounds of the law.

Contact for data protection purposes

You have several rights under the laws of data protection. Please contact Becky Hill on the contact details above if you have any queries or concerns. We retain a log of requests that we receive.

Right of access

You can contact us to request a copy of any personal data we hold about you on our systems or in our files, along with information about what we use it for. We must respond to you in a reasonable time, and always within a month. Unless the request is particularly complex, disproportionate or onerous there is no cost to you for making these requests.

Right to rectification

We must ensure that the data we hold about you is accurate. If you tell us that something is wrong, we will correct it and then confirm to you that we've done so.

Right to erasure

If you ask us to erase your personal data, we must do so unless there's a legitimate reason for us to keep it. For example, if you choose to withdraw your consent regarding marketing mailings we will remove you from our mailing lists. However, if you are also a client and we need to retain and process some of your personal data in order to satisfy our contract with you, in this case, we will restrict the data we process in line with what we need for those purposes.

Right to restriction of processing

If there is some dispute between you and us regarding the use of your personal data, you have the right to ask us to restrict the processing of your data. This means we can continue to store it but, we can't do anything else with it until the dispute is resolved. We'll inform you prior to beginning processing once the restriction has been removed.

Our recruitment processes

We are the data controller for any information you provide as part of our recruitment process and any recruitment process we carry out for our clients. All of the information you provide during the process will only be used for the purpose of processing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes, and your data will be stored on our IT systems. We may look up applicants' profiles on social media. If we use third parties for recruitment screening assessment, you will actively participate and therefore consent to sharing your data in that process.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for. The information we ask for is used to assess your suitability for employment only.

Unsuccessful applicants' data will be retained for six months and then deleted.

Privacy Policy

This privacy policy is reviewed regularly and provided to clients at the time of engagement.

Complaints

This privacy notice is designed to be clear and concise. We are happy to provide any additional information you need or have cause for complaint please contact Becky Hill.

HR Now Ltd, 17 Esplanade, St Helier, Jersey, JE2 3QA

If you're dissatisfied with the way in which your complaint has been handled you may contact your local data protection supervisory authority, or write to our local Information Commissioner:

Office of the Information Commissioner
Brunel House
Old Street
St Helier, Jersey
JE2 3RG

General enquires:
enquiries@OICJersey.org

Breach reporting:
breach@OICJersey.org