

Privacy Notice

Company Name:	Blue Copper Technology (BCT) Limited
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1. Introduction

This Privacy Notice explains in detail the types of personal information we may collect about you when you interact with us. It also explains how we'll store and handle that information, and keep it secure.

We hope the following sections will answer any questions you have but if not, please do get in touch with us at gdpr@bluecopper.co.uk.

In the future we may need to update this Privacy Notice. When we make any changes to the BCT Privacy Notice we will notify you of these changes.

2. Who are Blue Copper Technology Limited?

Blue Copper Technology Limited is an information technology specialist registered and headquartered in the United Kingdom. Blue Copper Technology is committed to protecting the privacy and security of the information which we collect and hold. In line with this commitment, our company privacy policy details how we process the information provided by Clients, Contractors, Suppliers and any third parties.

3. What is Personal Data?

“Personal Data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, video, email address or address). Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by the Data Protection Bill/Act 2017, the General Data Protection Regulation 2016/679 (the “GDPR”) and other legislation relating to personal data and rights such as Human Rights Act 1998.

4. Data Collection and Usage

Blue Copper Technology collects, holds and processes personal information (including sensitive personal information) in connection with our services. We may be in the process of recruiting you as a Candidate for a role with a Client, identifying exceptional Candidates for you as a Client, retaining you as a Vendor, or engaging with you as a Referee in relation to one of our Candidates.

5. Client Information

We may need to collect and use information about you or individuals at your organisation whilst providing our services to you. We need to have your contact details such as name, telephone number and email address as well as maintaining an accurate record of our interactions to ensure that we manage our relationship with you smoothly and efficiently.

Where appropriate and in accordance with the law, we may seek more information about you or your colleagues from other sources, generally by way of due diligence or other market intelligence including from third party market research and by analysing publicly available sources of information such as online media.

We may also hold your information in order to provide you with reports, white papers, market insight and analysis that we think you may find interesting (in each case, where this is in accordance with your preferences).

6. Consultant's Information

You may give your personal information to Blue Copper Technology directly, such as on a job application, registration form or via our website; or you may email your CV or speak to a Blue Copper Technology representative; or we may receive your information from another publicly available source or a third party, such as LinkedIn or a career website. If the Company sourced your information from a third party we will inform you how we obtained your information and whether the information came from a publicly accessible source.

By providing your personal information to Blue Copper Technology you agree that you would like to be considered for consultant assignments which we undertake on behalf of our Clients. You are not obligated to provide Blue Copper Technology with any information or participate in any of the services we offer. As such, we will consider any information we collect directly from you as having been provided voluntarily.

The personal information which we will typically need includes information from your CV such as your name, address, phone number, email address, employment history, education and qualifications. It may also include remuneration and compensation information, contact history and reference information.

We may also collect and hold sensitive information. This may include information relating to age, nationality, race and ethnicity, religious beliefs, trade union and political party membership, sexual orientation, fraud and criminal record. We may also collect and hold demographic and diversity information to help our Clients address diversity needs. Where we need to process your sensitive information, we will obtain your specific consent and provide a clear explanation as to why we need to process this information.

7. Reference and Source Information

In securing a reference about one of our Consultants, we may contact you for a reference and process your contact details such as name, email address and telephone number. We may also process certain professional information such as your job title, current employer and employment history. We may also process information such as your relationship to the Consultant and your experience and professional view of the Consultant's capabilities. We generally ask the Consultants to provide us with

much of this information but we may supplement it with information we collect about you from publicly available sources such as LinkedIn or through the contact with you directly.

8. Explaining the legal basis for processing your personal information

The law on information protection sets out the different reasons for which a company may collect and process your personal information. These legal bases for which we collect your personal information are listed below:

- (a) Legitimate interest. In most cases Blue Copper Technology Limited will process your personal information in the legitimate interest of providing you, our Clients and Consultants with Information Technology services. We will hold, collect and process your personal information so long as it does not infringe nor impact your rights, freedom or interests.
- (b) Consent. In specific situations, we will collect and process your information with your consent. For example, there may be occasions when we need to process sensitive personal information. On these occasions we will request your specific consent to obtain and process this information.
- (c) Contractual obligations. In certain circumstances, we need your personal information to comply with our contractual obligations. For example, we may need to process your information in order to facilitate payment to our consultants or associates.
- (d) Legal compliance. Where the law requires us to, we may need to collect, process and disclose your personal information to comply with a statutory or legal requirement.

You have the right to know what information we hold, how we are processing your information and on what legal basis. If you have any questions about the legal basis for processing your personal information, please refer to Section 13 'Your Rights' or contact us directly at gdpr@bluecopper.co.uk

9. How we will use your personal information

Blue Copper Technology may process your personal information in the following ways: -

- (a) Collecting, storing and processing personal information for the purpose of providing you with Information Technology services;
- (b) Providing these services to Clients which includes notifying consultants/contractors of opportunities which are assigned to us;
- (c) Assessing and reviewing consultant/contractor suitability for assignments and validating the information provided to us through referencing and vetting procedures;
- (d) Introducing consultants/contractors to our Clients;
- (e) Carrying out the necessary administration when supporting Clients with services or introducing a consultant/contractor to a Client i.e. managing invoices and payments;
- (f) Collating market research and information analysis or sector specific information for the purposes of providing you as a Client or Consultant/Contractor with reports, white papers, industry insight and analysis;
- (g) In line with your marketing preferences, providing clients with these reports, white papers, industry insight and analysis, news, events and other information. Where we do so, you will be able to unsubscribe from such communications;
- (h) Retaining a record of our interactions with you;
- (i) Establishing quality, training and compliance with our obligations and to meet our internal standards and industry best practice.

10. Transfer of Personal Information

Personal data will be treated as strictly confidential.

In the case of clients, Blue Copper Technology may share your personal information with consultants/contractors who will require information to perform services on our behalf. These third parties will have agreed to comply with the principles of GDPR as outlined in this Privacy Policy.

We may also release personal information to regulatory or law enforcement agencies, if they require us to do so. We will also disclose your information where we are permitted and requested to do so by law.

In the case of Consultants and Contractors we may share your information with Clients who will need to process your information for the purposes we have described in this Notice.

For Referees, we endeavour to keep your information confidential from the potential consultants you discuss with us, but under limited circumstance, your information may be disclosed to them.

If Blue Copper Technology Limited is acquired by another business or company, we may share personal information with the new owners of the business or company and their advisors and if this happens, we will promptly notify you of such an event.

Please be assured that we never sell your information to third parties or use the information for purposes other than those outlined in this policy.

11. Information Storage and Retention

Your personal information provided to Blue Copper Technology will be held securely within our database. Our centralised database is only accessible by Blue Copper Technology employees who adhere to our strict privacy and confidentiality principles.

We will retain your information where we have a legitimate business interest to provide you with our Information Technology services or where we have a legal or contractual obligation to do so.

Please note that where there is not ongoing legitimate business interest the following sets out the lengths of time we are required by law to retain your information or certain elements of your information:

- (a) for 12 months from the date we last provided our services to you for the purposes of providing evidence of these services we provided to you;
- (b) for 6 years from the end of each tax year for the purposes of retaining payroll records under the Income Tax (Employment and Pensions) Act 2003,
- (c) for 6 years from the end of each tax year for the purposes of keeping VAT records for any VAT registered limited company contractors.

If, however you have any questions about how long we store your personal information or would like to talk to us about having your personal information deleted or anonymised please contact our Data Protection lead at gdpr@bluecopper.co.uk.

12. Data and Information Security

We take appropriate steps to ensure your information is kept secure at all times. We have technology and organisational safeguards in place to protect against the loss, destruction, misuse, disclosure and unauthorised access to personal information under our control. Unfortunately, the transmission of information via the internet cannot be guaranteed secure. Whilst we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

13. Your rights

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

- (a) The right to be informed about the personal information the Company processes on you;
- (b) The right of access to the personal information the Company processes on you;
- (c) The right to rectification of your personal information;
- (d) The right to erasure of your personal information in certain circumstances;
- (e) The right to restrict processing of your personal information;
- (f) The right to information portability in certain circumstances;
- (g) The right to object to the processing of your personal information that was based on a public or legitimate interest;
- (h) The right not to be subjected to automated decision making and profiling; and
- (i) The right to withdraw consent at any time.

Where you have consented to the Company processing your personal information you have the right to withdraw that consent at any time by contacting our Data Protection Lead at Blue Copper Technology Limited on 0800 161 3088 or at gdpr@bluecopper.co.uk

If you wish to withdraw consent we will only retain minimal information to prevent future contact, or to keep a record of the information disclosed in line with our legal obligations.

14. Cookies

A cookie is a small file placed onto your device that enables website functions and targeted advertising. Cookies are very commonly used on modern websites, and their aim is to improve user experience by gathering information on how the website is performing.

Our website requires cookies to function properly. We define cookies as either:

- (a) 'first party cookies', which are cookies set and managed by Blue Copper Technology Limited and
- (b) 'third party cookies' which are set and managed by other organisations

We use 'first party cookies' to offer you the best possible user experience on our website. We categorise cookies used on bluecopper.co.uk into two categories:

- (a) Analytics & Research: these cookies help us analyse how well our site is performing. We use this information to improve your experience on our website.
- (b) Functionality: if you are signed in to bluecopper.co.uk we may use cookies to personalise your experience to show you more relevant content.

Blue Copper Technology Limited may on occasion use ‘third party cookies’ such as Google Analytics to assist with analysing the performance of our website.

You can control the usage of cookies in your web browser settings. You can disable cookies completely if you want to, but this could mean that bluecopper.co.uk may not function properly and cannot offer you the best possible user experience.

16. Contact us

If you wish to contact us with any questions, comments or complaints relating to this privacy policy or any of the procedures set out in it please contact our Data Protection Lead on 0800 161 3088 or email gdpr@bluecopper.co.uk

You also have the right to raise concerns with the Information Commissioner’s Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal information be processed outside of the UK, if you believe that your information protection rights have not been adhered to.