

## PRIVACY NOTICE – NEXT OF KIN CONTACT

### THE COMPANY AND THE COMPANY POLICY

- u #
- BeNext Uk Holdings Limited – Company Reg – 8044442 - ZB066799
  - gap personnel Holdings Limited (including Hawk 3 Talent) – Company Reg – 3589208 – ICO - Z2057848 - <https://www.gap-personnel.com/>
  - global personnel Limited – Company Reg – 11828264 – ICO - ZA841201 - <https://global-personnel.com/>
  - gap technical Limited – Company Reg – 5646432 – ICO – ZA230558 - <https://www.gap-technical.com/>
  - gap personnel (TELFORD) LTD – company Reg – 13377649 – ICO – ZB346100 - <https://www.gap-personnel.com/>
  - Quattro Recruitment Limited t/a gap personnel – Company Reg – 7131120 – ICO – ZA015243 - <https://www.gap-personnel.com/>
  - Quattro Healthcare Ltd t/a gap healthcare – Company Reg - 9389534 – ICO – ZA127351 - <https://www.gap-healthcare.com/>
  - Driving Force Recruitment Limited - company Reg – 06538808 – ICO - Z1709668 - <https://www.driving-force.co.uk/>
  - Ascend Talent Limited Company Reg - 15063281 <http://www.ascend-talent.co.uk/>
  - Circle Support Limited Coimpany Reg - 15063240 <http://www.circlesupport.co.uk/>

u #

u # # ‡

### 1. COLLECTION AND USE OF PERSONAL DATA

u #

#

@

‡

@ # ‡

#### 1.1 COLLECTION OF DATA

#### 1.2 PURPOSE OF PROCESSING AND LEGAL BASES

Legal base	Example of purpose
Legal obligation	)
Contractual obligation	)
Legitimate interest	u
Consent	)
Public interest	)
Vital interest of data subject	u

#### 1.3 RECIPIENTS/S OF DATA

‡

#

\

8

k-# 80 ° ° h o o u

\

U V

\ @ #kU ‡ U

u @

‡ uyh- u u y h

- k

‡

=

## 2. OVERSEAS TRANSFERS

The Company may transfer the information you provide to us to countries outside the European Economic Area ('EEA'). The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

Whenever your data is shared, inside or outside of the EEA, we will take every step possible to ensure adequate protections are in place to ensure the security of your information.

## 3. AUTOMATED DECISION-MAKING DRAFT AMENDS

The company does not use automated decision-making, including profiling that would impact you in the capacity and purposes for which we hold your data. Should the company intend to change this process you will be notified in advance.

## 4. DATA ACCESS RESTRICTION AND RETENTION

Circle Support will retain your personal data and/or sensitive data only for as long as is necessary. Different laws require us to keep different data for different periods of time.

### 4.1 WHERE SERVICES HAVE NOT BEEN PROVIDED

If we have not provided the individual for which you are an appointed Next of Kin contact with our services, or had valuable contact with for two consecutive years, your personal data will be deleted from our systems save where we believe in good faith that the law or other regulation requires us to preserve it.

### 4.2 WHERE SERVICES HAVE BEEN PROVIDED

Your personal details may be included in several documents created during the course of our contract with the individual for which you are an appointed Next of Kin contact. To comply with legal requirements e.g. HMRC, UK Visas and Immigration, The Conduct of Employment Agencies and Employment Businesses Regulations 2003, Agency Workers Regulation, HSE and tax legislation, your data will be kept by The Company for 7 tax years from the last date on which services were provided to the individual for which you are an appointed Next of Kin contact.

Where the Company has obtained your consent to process your personal data and sensitive personal data we will do so in line with the relevant schedule detailed above. After expiry of that period your data will no longer be kept by Circle Support.

## 5. SECURITY PRECAUTIONS IN PLACE TO PROTECT THE LOSS, MISUSE OR ALTERATION OF DATA

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures, e.g.:

- a) encryption of our services and data;
- b) review our information collection, storage and processing practices, including physical security measures;
- c) restrict access to personal access to personal information;
- d) internal policies setting out our data security approach and training for employees, these include measures to deal with any suspected data breach.

Our systems are placed on servers dedicated to The Company, running on an industry-standard virtualization platform based on VMware. Our server provider, where we store most of the data, is ISO 27001 accredited, follows industry best practices, and regularly patches and upgrades platforms. All servers that we use to store your data are located in the UK and comply with the General Data Protection Regulation. Our security systems are kept up to date and align with the guidance to security information.

Devices: All the computers/laptops are enrolled and managed centrally through Microsoft Entra ID. The security is enhanced using Device Management Policies, Conditional Access, Endpoint Protection, Remote Device Management, ESET Antivirus, and Multi-Factor Authentication.

Emails: All our users use Office 365 emails protected with several layers like Encryption in Transit, Anti-Malware Protection, Anti-Spam Filtering, Multi-Factor Authentication, and a few more to safeguard against various threats.

Candidates are stored in Mobile Rocket via a @circlesupport login, ensuring compliance with company policies. This is subject to the candidate completing the work finder agreement. For candidates who have submitted a CV but haven't been moved across to Mobile Rocket, this is subject to the candidate completing the work finder agreement.

## 6. YOUR RIGHTS

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

- a) The right to be informed about the personal data the Company processes on you;
- b) The right of access to the personal data the Company processes on you;
- c) The right to rectification of your personal data;
- d) The right to erasure of your personal data in certain circumstances;
- e) The right to restrict processing of your personal data;
- f) The right to data portability in certain circumstances;
- g) The right to object to the processing of your personal data 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 data and sensitive personal data you have the right to withdraw that consent at any time by completing on-line request ([click here](#)) or emailing [dpo@circlesupport.co.uk](mailto:dpo@circlesupport.co.uk)

## j) 7. COMPLAINTS OR QUERIES

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: [dpo@circlesupport.co.uk](mailto:dpo@circlesupport.co.uk)

You also have the right to raise concerns with the Information Commissioner's Office (ICO) 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.