

Illuminet Privacy Notice

1. Introduction

At Illuminet, we take our obligations in respect of the privacy of personal data very seriously and we will only process personal information as detailed in this notice, unless we inform you otherwise.

This privacy notice provides information about the collection and use of personal data relevant to individuals who use our services, either as:

- A client who we provide services to or have formed an ongoing business relationship with.
- An associate who has registered their details with us or who has subsequently worked as a consultant or resource through us.
- A candidate who has been identified for a specific assignment through our recruitment or consultancy divisions.

We refer to all individuals as 'you' or 'your' in this notice.

We reserve the right to amend this Privacy Notice at any time. The applicable version will always be accessible via our Website or LinkedIn pages. If we make changes that significantly alter our privacy practices, we will post a notice on our Website or LinkedIn pages prior to the change taking effect.

2. Who are we?

Illuminet Solutions Limited is an IT Management Consultancy, Managed Services provider and Recruitment business providing contract and permanent resources to support our client solutions or to meet client's individual resource requirements. We operate under the brand names of Illuminet, Illuminet Consulting and Illuminet Recruitment.

Our registered office address is Discovery Court Business Centre, 551-553 Wallisdown Road, Poole, Dorset. England. BH12 5AG.

3. What information do we collect about you?

For all clients, associates or candidates, we will collect, hold (in hard copy and computer readable form) and process personal data, such as your contact information (e.g. email address and telephone number), current company details and role, and where provided by associates or candidates your CV's.

We also retain data provided by associates who have completed the [Illuminet Associates Form](#), and have provided their specific consent for us to retain and use this data alongside your CV's if submitted. The form records information such as the type of assignments you could be interested in, rate/salary expectations, skills, location preferences and availability.



Where an associate or candidate has been offered an assignment, we are required by law to collect proof of identification and proof of the right to work in the UK, and details on criminal offences or proceedings.

Where the assignment is of a contract or consultancy nature, prior to commencement we will also require additional details regarding your company's incorporation status, VAT status, bank account details, National Insurance numbers, Personal UTR Tax Numbers and insurance certificates in order to commence the engagement and meet our contractual obligations to you.

For clients, we also retain information specifically related to your business including both current and potential requirements as expressed in our meetings and correspondence which will help us to support your business.

Under normal circumstances we do not hold any special category data such as race, ethnic origin, politics, religion, trade union membership, health, sex life or sexual orientation and we would not request that information from you. We would only collect and process that type of data at your request and only where it is pertinent to support you in an upcoming assignment (e.g. information regarding any disabilities you would like us to take into account to assist you in the role).

4. Where do we obtain this personal data from?

We may obtain your personal data from the following sources (this list is not exhaustive):

- You (e.g. completing our online form or sending us your CV)
- A recommendation from a client, former employer or mutual contact.
- Online jobsites
- Marketing databases
- The public domain
- Social Media (e.g. LinkedIn)

No data is obtained from the company's website through cookies or other extraction methods.

If required, we will provide you with details regarding how and where we sourced your personal data on initial contact.

5. What do we do with your personal data?

For clients, we use your personal data to maintain contact with you and follow up as appropriate. As part of our legitimate interest in the proactive management of the account, we will also provide updates either by phone or email on our products and services as well as any resourcing opportunities we may identify based on our pipeline of associates and candidates. We only process your data in ways you would reasonably expect to maintain our relationship, and which have a minimal privacy impact.

Initial associate data captured via the Illuminet Consultant form, and associated CV if submitted, is used to assess your suitability for consultancy or recruitment opportunities



based on the skillset, location, availability and remuneration requirements specified. Likewise, all data provided by a candidate for a specific role will be used to target that opportunity.

Where an associate or candidate progresses to a point they have been offered an assignment, the additional data requested is used exclusively to set you up in that assignment and ensure all contractual requirements are completed with ourselves and the client, associated invoicing and payroll processing is set-up, and for us to undertake our statutory and regulatory obligations.

We do not use your personal data to undertake any form of automated individual decision making or profiling.

6. Who do we share your personal data with?

We will not share client data without your consent, and those requests will be in the format of testimonials you provide and therefore with your express permission regarding the level of anonymisation required.

We only share associate or candidate personal data (including sensitive data) with prospective employers after receiving your prior consent, or to regulatory / statutory bodies if we are required by law to do so. However, we may share an anonymised version of your CV with potential clients as an example of the capability of our Virtual Bench, and we may use anonymous summarised data in the same way.

When an associate or candidate progresses towards the commencement of an assignment, with your explicit consent we will share specific personal data with a reference agency of our choice, acting as data processor on our behalf, to undertake Credit, Identification and Criminal Record checks, and report relevant findings to the client.

We will never sell, share (or gift) your data to a 3rd party outside of the above.

7. How do we protect your personal data?

We place great importance on the security of all personally identifiable data we hold and take all reasonable precautions to prevent unauthorised access both from within and outside the company.

All data is retained utilising industry standard Software products whose suppliers have made commitments to deliver GDPR compliance as part of the provision of their services.

Access to your data is strictly controlled to ensure only personnel with a direct requirement to utilise the data as part of their role can access it. This may include agents, sub-contractors and other contracted organisations who are appointed to provide services to us, but they will be bound to adhere to this Privacy Notice, our Data Protection Policy and applicable data protection legislation.

8. How long do we keep your personal data?

We will retain personal data for the period when our relationship is active, plus the following additional timescales:

- Client data - a period of 7 years following the cessation of the relationship.
- Associate or candidate data when employment has been obtained through us - a period of 7 years following the cessation of the relationship. This is to ensure all current and future statutory and client reporting requirements can be met.
- Associates who were not subsequently employed through us – a period of 12 months following the last contact between us (e.g. following a failure to respond to a request from us to update your data).

Once the specified retention dates have passed, your data will be deleted.

You can indicate at any time that you would like your personal data to be removed and we will erase your details from our records, unless we are required to keep it for legal or contractual purposes, in which case we will confirm which records we are obliged to retain.

9. How do we check that your data is accurate?

Client data is validated as part of the ongoing reviews scheduled by the relevant relationship manager.

We will send regular reminders to associates to confirm the accuracy of your data, predominately based on your ongoing availability status and dates. We will also validate your data when we contact you regarding a potential assignment.

We take every reasonable precaution to ensure that we only hold up-to-date information about you, however we would also appreciate notification of any change in your circumstances which results in a change in data provided to us.

10. What are your rights over your personal data?

You have the right to be informed about the collection and use of your personal data, which this notice provides, and can be referenced on an ongoing basis by following links from our Website and LinkedIn pages.

You have the right to request:

- A copy of the personal data we hold about you, including the ability if possible to provide that data in a portable format.
- The correction of your personal data when inaccurate, out of date or incomplete.
- That your personal data is deleted when it is no longer necessary for us to retain such data.
- The withdrawal of your consent allowing us to process your personal data, either in its entirety or for specific uses such as e-marketing communications.
- The right to request a restriction on further data processing, if for example there is a dispute in relation to the accuracy or processing of your personal data.



- The right to object to the processing of personal data, where that data processing has been based on legitimate interest and/or direct marketing.

11. What happens if you withdraw your consent?

If you raise a request to withdraw your consent through direct contact or an 'unsubscribe' request, the record we hold of this request will include your name, email address and company role (if applicable) to ensure you are correctly identified in future and not contacted further.

12. Who should you talk to raise requests or concerns?

Any requests regarding either your privacy rights or more general data protection questions or concerns should be sent to dataprivacy@illuminetsolutions.com where they will be dealt with by the Data Protection Officer (DPO), or write to The DPO, Illuminet, Discovery Court Business Centre, 551-553 Wallisdown Road, Poole, Dorset. England. BH12 5AG.