

## Data Protection and Privacy Policy

McGregor Boyall is committed to ensuring the privacy of its employees & candidates and the confidentiality of information provided by its clients. In particular we will use our best endeavours at all times to ensure that all the information submitted to us by candidates either in writing, by email or via our website at mcgregor-boyall.com remains private and is only used for the purposes set out in this policy.

### Candidate Information

#### What information we collect and how we use it

Candidates' personal details, including name, e-mail address and CV, are held and used by us for the following purposes:

- For matching provided details with job vacancies, to help us find the most appropriate vacancies for candidates
- For keeping candidates updated on McGregor Boyall services, news and wider developments in their chosen field
- For compiling salary and other surveys of our candidates which aggregate data on an anonymous basis

#### Information Disclosure

We share candidate information within McGregor Boyall associated companies where necessary in order to provide candidates with our recruitment services. Candidates' CV's and related information may be sent to prospective employers but only where they have given consent - such employers will be located inside the UK/European Economic Area. Should a candidate's CV / information need to be sent outside the European Economic Area, specific consent needs to be received from the subject.

We may also release information relating to candidates to regulatory or law enforcement authorities, if required to do so. We also reserve the right to disclose the information which candidates have provided us to 3rd parties that have been retained by prospective employers to manage their recruitment operations. These third parties will be acting under similar undertakings of confidentiality as McGregor Boyall.

#### Job Alerts

To subscribe to job alert emails via the McGregor Boyall website, candidates will be required to provide their e-mail address and to create a password, which will be used for the purpose of keeping them informed, by e-mail, of the latest jobs in their chosen market sectors and/or sector news via job alerts.

Should candidates no longer wish to receive job alerts, an unsubscribe facility is provided in all job alert emails.

#### Curriculum Vitae ("CVs")

We offer all candidates the facility to submit a CV via our website, or directly by email or indirectly via 3<sup>rd</sup> party job boards. This may be done in order either to apply for a specifically advertised vacancy or to be considered by our recruitment consultants for vacancies as they arise in the day-to-day course of business. Although candidate CVs will be stored online, they will only be accessible by McGregor Boyall recruitment consultants working in the UK/European Economic Area.

CVs will in the normal course of business also be e-mailed directly to our recruitment consultants who review candidate details and enter them onto our central in-house database (“Bullhorn”) which can be accessed by all our recruitment consultants working in offices in the UK/European Economic Area.

Candidates can update their CV at any time, simply by following the same procedure as required to submit a new CV.

### **Aggregated information about McGregor Boyall’s online usage.**

We gather information and statistics about visitors to our various websites. Such data is used anonymously and in aggregate only. This information helps us determine what is most beneficial for our users and how we can continually improve our online services to create a better recruitment service for our candidates and clients. We may also publish from time to time some of this anonymous, aggregated information on our website.

### **Access**

Candidates have the right at any time to ask for a copy of the information supplied by them and held by us. We have the right to charge an administrative fee for this service. If candidates wish to make a request for information, they can contact [webinfo@mcgregor-boyall.com](mailto:webinfo@mcgregor-boyall.com). Candidates also have the right to ask McGregor Boyall to stop using their information.

### **Other websites**

Clicking on links and banner advertisements on our website may result in candidates being transferred to another website, where data privacy practices may be different to that of McGregor Boyall. Visitors should consult the other websites' privacy policies as we are not responsible for, and have no control over, information that is submitted to or collected by these third parties.

## **Client Information**

McGregor Boyall undertakes:

- to treat all the Confidential Information provided by clients as confidential regardless of when it is disclosed or obtained and the form in which it is disclosed or obtained,
- to not, without our clients' prior written consent in each case, communicate or disclose any confidential information to any person except:
  - on a need-to-know basis to those employees, consultants and professional advisers of McGregor Boyall who are concerned with the appropriate recruitment assignments and those employees, consultants and professional advisers of any associated companies who are so concerned,
  - to any other persons or bodies having a legal right or duty to receive confidential information in connection with the functions of McGregor Boyall,
  - where McGregor Boyall is ordered by a court of competent jurisdiction to do so or there is a statutory or other legal obligation to do so.
- to ensure that all persons and bodies mentioned above are made aware, prior to the disclosure of any confidential, of the confidential nature thereof, that they owe a duty of confidence to the our clients and

agree to hold confidential information in confidence in accordance with the terms of this privacy policy and to use all reasonable endeavours to ensure that such persons and bodies comply with all such obligations,

- not to use confidential information in any way which would be harmful to the our clients,
- to effect and maintain the same adequate security measures to safeguard confidential information from unauthorised access, use and misappropriation as it maintains with its own similar information that it does not wish publicly to disclose, publish or disseminate provided that such security measures shall be at least as stringent as best industry practice,
- to notify our clients promptly of any unauthorised use, copying or disclosure of any confidential information of which McGregor Boyall becomes aware and to provide all reasonable assistance to our clients to terminate such unauthorised use or disclosure.

## Employee Information

McGregor Boyall holds and uses the data comprised in the personnel files of its employees to enforce its rights and to meet its obligations as an employer in accordance with the Data Protection Act 1998 (and for the purposes specified in this privacy/data protection policy as amended from time to time).

McGregor Boyall may monitor and record all uses made by its employees of its telecommunications systems (including telephone calls and e-mails made, sent or received) during the course of employment for the purposes permitted under (and in accordance with) the Telecommunications (Lawful Business Practice) (Interception Communications) Regulations 2000. These purposes include establishing facts, ascertaining compliance with regulations and codes of practice, ascertaining standards which are or should be achieved by users of McGregor Boyall's telecommunications systems, determining whether communications are relevant to McGregor Boyall's business or activities and for preventing or detecting crime or breach of relevant regulations.

The signature of employees of their contract shows their consent to the holding and use of such data by McGregor Boyall and the monitoring and (where permitted by regulation) recording of such uses of McGregor Boyall's telecommunications system.

## Changes to our Privacy Policy

This privacy policy may be changed by McGregor Boyall at any time. Should we change our privacy policy, we will set out those changes here, so that candidates and clients will always know what personal/corporate information we gather, the purposes we might use it for and to whom we might disclose it.

If, at any time, candidates or clients have questions or concerns about McGregor Boyall's privacy commitment they should e-mail us at [webinfo@mcgregor-boyall.com](mailto:webinfo@mcgregor-boyall.com) or telephone us on 020 7422 9000.

## Equal Opportunities

McGregor Boyall is an equal opportunities employer and a company committed to diversity. This means that all job applicants and members of staff will receive equal treatment and that we will not discriminate on grounds

of gender, marital status, race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion or age.

As part of our commitment to equal opportunities we may from time to time use information provided by candidates and members of staff for the purposes of diversity monitoring. Any such information will be used on an anonymous basis in accordance with the terms of this Privacy Policy.