

# Data Privacy Policy

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# Data Privacy Policy

## 1.0 Scope

All data subjects whose personal data is collected by Metroworth Consulting, in line with the requirements of GDPR.

## 2.0 Responsibilities

- 2.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to Metroworth Consulting collecting/processing their personal data.
- 2.2 All Employees of Metroworth Consulting who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

## 3.0 Privacy Notice

### 3.1 Who are we?

Metroworth Consulting is the organisation who collects the personal data from [www.metroworth.com](http://www.metroworth.com) as well as directly from data subjects i.e. data controller. Metroworth Consulting will use your data to help find the relevant vacancies or assignments.

With regards to why we collect the data and what we do with it, we will use your data to find out your job requirements and if you are interested in advertised vacancies or services on the website, we will be notified of your requirements via your online registration or application and provide you with an introduction to the most suited role for your qualified profession.

#### **Our Data Protection Officer can be contacted directly here:**

- Sarah Parker
- [sarah@metroworth.com](mailto:sarah@metroworth.com)
- +44 (0)1252 792020

#### **The personal data we would like to collect and process is:**

##### **a) Personal Data Type:**

Source (where Metroworth Consulting obtained the personal data from if it has not been collected directly from you, the data subject. Not if the personal data has been accessed from publicly accessible sources):

##### **b) Contact Name:**

We will use this to service your enquiry and to ensure we are speaking to the correct person when we make contact.

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**c) Contact Number:**

We will use this to service your enquiry, we will call you so that we can discuss your enquiry with yourself.

**d) Contact Email:**

We will use this to service your enquiry, we will email details of the service that you have enquired about and use your email address as a method of ongoing communication.

**e) Curriculum Vitae:**

We will use this to service your enquiry, to screen for suitable vacancies and match against future client requirements. By submitting your curriculum vitae to Metroworth Consulting, you are consenting for our company to;

- a) record, transmit and store current AND historical versions / personal details which can include but is not limited to; full name, date of birth, citizenship, residency status, marital status, personal / work postal address, personal / work email address, contact telephone numbers, historical copies of curriculum vitae (which may include historical contact details) engineering discipline, previous work history including confidential projects (if listed), educational qualifications, work permit status, visa status and employment referees names (references are the responsibility of the data subject to obtain consent from the referee to include their personal details within the data subjects curriculum vitae),
- b) submit your CV (minus personal details and only with explicit consent) to our active clients in relation to suitable vacancies. This submission can be directly via email or via the client own portal / platform.

**f) Financial Information:**

We will use this to service the contractual agreements and payments between staff member and Metroworth Consulting, client and Metroworth Consulting, contractor and Metroworth Consulting and supplier and Metroworth Consulting. By submitting your financial information to our company, you are consenting for Metroworth Consulting to record, transmit and store current AND historical confidential / sensitive personal data which can include but is not limited to; personal banking details (including sort code and account number), third party banking details i.e. managed service companies / clients / suppliers (including sort code and account number), bank address and account type, national insurance / social insurance number, social security number, unique tax payer reference number, current tax code, current and historical payslips, attachment to earnings information, copies of claimed expenses, commission / bonus payments and an historical electronic account of all financial transactions processed by our company via our chosen data processor.

**g) Pre / Post Onboarding Information:**

We will use this to service the contractual agreements between contractor and Metroworth Consulting, contractor limited company and Metroworth Consulting and managed service company and Metroworth Consulting. By submitting your

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onboarding information to our company, you are consenting for Metroworth Consulting to record, transmit and store current AND historical confidential / sensitive personal data which can include but is not limited to; signed contractual agreements, photo ID (i.e. passport / driving licence), educational

certificates, industry course certificates, Limited Company certificate of incorporation, Limited Company VAT certificate, Limited Company liability insurance policies, Managed Service Company certificate of incorporation, Managed Service VAT certificate, Managed Service Company liability insurance policies, applicable financial information to service the agreement between both parties (as detailed in section (f)), medical insurance documentation, visa applications / visas / work permits, travel documentation (including car hire, accommodation and flight purchases), end client onboarding documentation (including but not limited to confidentiality agreements, drug and alcohol abuse policies).

**h) Product Interested In:**

We will use this to service your enquiry and so that the relevant member of staff can deal with your enquiry ensuring you receive the best level of service.

**i) Time Stamp & Date Stamp of Enquiry:**

We will use this to service your enquiry and for compliance to ensure we can provide proof of an enquiry made.

**j) IP Address Enquiry Made on:**

We will use this for compliance to ensure we can provide proof of an enquiry made.

**k) If You Want to Be Contacted in The Future And How:**

We will use the information to contact you in the future via the Company's chosen Data Processor's platform technology.

**The personal data we collect will be used for the following purposes:**

- We will use your data to help us service your recruitment enquiry.
- We will use your data to help us manage any data subject recruitment service you take out with us.
- If you opted in for marketing in the future in regards to future vacancies or agency services, we will contact you via email or telephone with relevant details (inclusive of newsletters).

**Our legal basis for processing for the personal data:**

- If you have decided to enter into a business agreement with Metroworth Consulting, under the contract we will need to process your details to service your requirements.

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**The special categories of personal data concerned are:**

We do not process any special categories. We have included a list of what these categories are for your records under GDPR.

- Racial
- Ethnic origin
- Political opinions
- Religious beliefs
- Philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Health data
- Sexual orientation

## 3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified within this document.

Consent is required for Metroworth Consulting to process all types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used. You may withdraw consent at any time by;

- a) Accessing your online candidate profile and going to the opt out page on our website
- b) Contacting Metroworth Consulting's Data Protection Officer (see section 3.1)

## 3.3 Disclosure

Metroworth Consulting will not pass on your personal data to third parties without first obtaining consent.

## 3.4 Retention Period

Metroworth Consulting will process personal data for the length of any agreement we have in place to enable the management of the service we provide. If you choose not to continue with a service we provide, we will purge your details (in line with our defined deletion procedures) unless you have opted in for further contact in regards to vacancies, services or news from Metroworth Consulting. We will always provide you with the opportunity to opt out on all future correspondence (i.e. email unsubscribe).

Metroworth Consulting have come to an agreement relating to the data retention period in line with the company's Quality Management System. This is defined considering how long we need the data to service the data subjects needs and in regards to how long we hold data where the data subject has opted in for further contact. We will retain this until the data subject chooses to opt out as they will be given the option to do during methods of correspondence. We also make contact every 12 months with the data subject asking them to re-consent. If they do not

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respond within a 6 month period following this communication, we will permanently delete their details.

## **3.5 Your Rights as a Data Subject**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access - you have the right to request a copy of the information that we hold about you (candidate portal access available).
- Right of rectification - you have a right to correct data that we hold about you that is inaccurate or incomplete (candidate portal access available).
- Right to be forgotten - in certain circumstances you can ask for the data we hold about you to be erased from our records (in line with governed specific business sector requirements and agreed practices).
- Right to restriction of processing - where certain conditions apply to have a right to restrict the processing.
- Right of portability - you have the right to have the data we hold about you transferred to another organisation.
- Right to object - you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling - you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to object referral - If you choose to use our referral service to tell a friend about a job opening and/or about our products, we will ask you for your friend's name, phone number, and email address. We will automatically send your friend a one-time email inviting him or her to visit the Website. Metroworth's data processor stores this information for the sole purpose of sending this one-time email and tracking the success of our referral program. Your friend may contact us to request that we remove this information from our database.
- Right to judicial review: in the event that Metroworth Consulting refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

## **3.6 Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Metroworth Consulting (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Metroworth Consulting's data protection representative- Data Protection Officer.

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The details for each of these contacts are:

## Data Protection Officer

- Sarah Parker
- [sarah@metroworth.com](mailto:sarah@metroworth.com)
- +44 (0)1252 792020
- Registered Office: The Engine House, Studio 43.1, 2 Veridion Way  
Erith, Kent, DA18 4AL
- [www.metroworth.com](http://www.metroworth.com)

## Information Commission Officer (ICO)

- Wycliffe House, Water Ln, Wilmslow, SK9 SAF
- <https://ico.org.uk>
- [casework@ico.org.uk](mailto:casework@ico.org.uk)
- 0303 123 1113

## 4.0 Online Privacy Statement

### 4.1 Personal Data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

#### 4.1.1 Metroworth Consulting - How we use your information

This privacy notice informs you how we, Metroworth Consulting, will collect and use your personal data as follows:

- **Visitors to our website(s)**

When visitors arrive on [www.metroworth.com](http://www.metroworth.com), we use a third party service, Google Analytics, to collect from you basic internet log information and information on your behaviour patterns while you're on the site. This information lets us know how many visitors come to the site and what pages they are looking at and the amount of time they spend on certain pages. The information collected cannot identify anyone and we ensure ourselves and Google ([read Google Analytics Privacy Policies](#)) do not use this information to identify an individual or someone who has or is visiting our site. If we do want to collect personally identifiable information through our website, we will clearly advise this to the data subject. We will make it clear when we collect personal information and will explain what we intend to do with it.

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- **ATS (Applicant Tracking System) Profiles**  
Metroworth Consulting use a third party data processor / Applicant Tracking System (ATS), iCIMS, to collect basic personal details and an electronic resume in order to create an online profile and provide a recruitment service. Consent will be requested via clearly identifiable notifications within the ATS online registration process.
- **Payment Transactions**  
Metroworth Consulting use third party data processors to record, transmit and store all financial transaction / payment details. Financial transactions include for Staff members, clients, suppliers and contractors. By accepting the terms of this data privacy policy you are consenting for our company to hold current AND historical confidential / sensitive personal data in order to action the agreed payment terms between both parties.
- **How [www.metroworth.com](http://www.metroworth.com) uses Cookies**  
You can learn more about our [Cookies Policy here](#)
- **E-newsletter**  
We will send out vacancy alerts and company news via email to data subjects who have explicitly expressed that they want a profile saved for them on our ATS and would like to be contacted by Metroworth Consulting going forward. This consent will be captured via the Data Processors opt in screens.
- **Security and Performance**  
We use a third party programme to protect our website from malicious malware and attacks, which mean it will check your IP address on arrival.
- **People who contact us via Social Media**  
We will return a contact request via the chosen platform that the data subject contacted the company through. The member of staff you make contact with may also create a file on our Applicant Tracking System (ATS) where we will collect personal information to enable the saving of this profile, but you will be made fully aware by the member of staff of this process and only with your consent will this be captured. This will only be collected to help with your vacancy or agency service enquiry.
- **Inbound Calls To Our Office Number**  
We will collect your calling line identification (CLI). The member of staff you speak to may also create a file on our Applicant Tracking System (ATS) where we will collect personal information to enable the saving of this profile, but you will be made fully aware by the member of staff of this process and only with your consent will this be captured. This will only be collected to help with your vacancy or agency service enquiry.



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## 4.1.2 Uses Made of the Information

We use the information held about you in the following ways:

- **Information you give to us**

We will use this information to carry out our obligations arising from any recruitment services, service agreements or contracts entered into between the Data Subject and the Company. We will use this information to provide you with the communication and services you request from us, to notify you about changes to our services or to make suggestions and recommendations that may interest you about our range of services, or to ensure that content from our site is presented in the most effective manner for you and for your computer.

- **Information we collect about you**

We will use this information:

- a) to administer our Applicant Tracking System (ATS) and for internal operations including recruitment services, data analysis, testing, research, statistical and survey purposes;
- b) to improve our recruitment services to ensure that content is presented and recorded in the most effective and up to date manner;
- c) to allow you to participate in interactive online features of our services, when you choose to do so;
  - i. as part of our efforts to keep our site safe and secure;
  - ii. to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
  - iii. To make suggestions and recommendations to you and other users of our site about services that may interest you or them.

## 4.1.3 Children under the Age of 13

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on our company Website or on or through any of its features/register on our Website, use any of the interactive or public comment features of our Website or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any user name you may use. If we learn that we have collected or received personal information from a child under 13 we will delete that information immediately.

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## 4.1.4 Why does Metroworth Consulting need to collect and store personal data?

In order for us to provide you with a recruitment service and all supporting services that follow in the future.

Metroworth Consulting provides a streamlined jobseeker service which includes:

- Matching potential candidates to job vacancies and working directly with companies to help fill their roles
- Building good relationships with top employers within the Oil and Gas Industry and giving our candidates exclusive access to these jobs. Putting interested candidates forward for positions that you wouldn't otherwise have heard about
- Providing ongoing jobseeker support to all Data Subjects who choose to have a candidate profile stored on our company's Applicant Tracking System (ATS).

We need to collect personal data for correspondence purposes and servicing the client's enquiry and to ensure we can provide any services that the client requested. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Metroworth Consulting would obtain consent at the point of initial contact.

## 4.1.5 Will Metroworth Consulting share my personal data with anyone else?

We will only pass your personal data on to a third-party service if you provide us with consent. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide to you or us the agency. When they no longer need your data to fulfil this service, they will dispose of the details in line with their own GDPR disposal procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

## 4.1.6 How will Metroworth Consulting use the personal data it collects about me?

Metroworth Consulting will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Metroworth Consulting is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices.

Personal data may be held in addition to these periods depending on individual business needs.

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## 4.1.7 Under what circumstances will Metroworth Consulting contact me?

Primarily, any contact with a Data Subject will be relating to new or existing recruitment services. Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to the company's own information security policies and procedures to minimise the risk of unauthorised access or disclosure.

## 4.1.8 How do we protect your information?

We hold personal information in electronic format. We use a range of physical, operational and technological security measures to protect this information. These measures include:

- Staff education and training to ensure our staff are aware their privacy obligations when handling your personal information
- Administrative and technical controls to restrict access to personal information to only those people who need access
- Technological security measures, including fire walls, encryption and anti-virus software
- Physical security measures, such as staff security passes to access Company premises, laptop locks and the companywide approach to a clear desk policy.

## 4.1.9 Can I find out the personal data that the organisation holds about me?

Metroworth Consulting at your request can confirm what information we hold about you and how it is processed. If Metroworth Consulting does hold personal data about you, you can request the following information:

- Identity the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Metroworth Consulting or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third party or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.

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- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.

## 4.1.10 The source of personal data if it wasn't collected directly from you

Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

## 4.1.11 What forms of ID will I need to provide in order to access this?

Primarily, requests of this nature must be received via the company's online portal which enables legitimacy of the individuals request and provides safe guarding when identifying the Data Subject.

However, following receipt of this primary online request, Metroworth Consulting will require evidence from the Data Subject of the following forms of ID before the request can be actioned:

- Passport or photo driving licence.

If you can't provide a passport or driving licence we will accept a birth certificate with some form of photo ID & proof of address in the last 3 months.

The company's Data Protection Officer will also make direct telephone contact with the Data Subject before actioning this request.

### Contact details of the Data Protection Officer:

- Sarah Parker
- [sarah@metroworth.com](mailto:sarah@metroworth.com)
- +44 (0)1252 792020
- Registered Office: The Engine House, Studio 43.1, 2 Veridion Way  
Erith, Kent, DA18 4AL
- [www.metroworth.com](http://www.metroworth.com)

## 5.0 Changes to this Privacy Statement

We may modify or amend this Privacy Statement.

To let you know when we make changes to this Statement, we will amend the revision date within the footer on each page. The new modified or amended Privacy Policy will apply from that revision date. Therefore, we encourage you to periodically review this policy to be informed about how we are protecting your information.