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1. Scope

This Privacy Notice describes how SM Global Consultancy Ltd collects and uses personal information and sensitive information relating to SM Global Consultancy Ltd People (see section 17 for definition of SM Global Consultancy Ltd People). This will include what information is collected, why we ask for it, and how we use it.

This document applies to all SM Global Consultancy Ltd People covered by the following legal entities:

- SM Global Consultancy Ltd
 - o Trading as Staffing Match
 - o Training Match

The data controller processing your personal data as an employee will be your employing entity. Your contact for each data controller will be the SM Global Consultancy Ltd HR Department (See section 17 for contact details).

2. Our obligation

At SM Global Consultancy Ltd we are committed to:

- Processing your personal information fairly and in accordance with applicable regulations.
- Informing you about how we will use your personal information.
- Only collecting information from you when we need it for legitimate purposes, or for legal reasons.
- Ensuring that your personal information is adequate, relevant and not excessive for the purpose for which we collect it.
- Not keeping your personal information for longer than we need to.
- Keeping your personal information secure, and limiting the people who can access it.
- Ensuring that you know how to access your personal information and to exercise your legal rights, including keeping your information accurate and up to date.
- Ensuring any third parties we share your information with take appropriate steps to protect it.

3. What information do we collect?

The personal information we collect about you will depend on the nature of the role you carry out for us and your personal circumstances. Whilst the list below is not exhaustive, it sets out examples of the types of information which, depending on your role, we will collect about you:

Type of Information	Example
Basic personal details	Name Address Date of Birth Age
Equal opportunities monitoring details	Ethnicity Nationality

	<ul style="list-style-type: none"> Religion Disabilities Gender Marital Status Next of Kin Dependents Date of Birth
Information to contact you at home or in an emergency	<ul style="list-style-type: none"> Home telephone number Mobile number Personal email address Emergency contact details
Information about your suitability to carry out your role and to work for SM Global Consultancy Ltd	<ul style="list-style-type: none"> CV SM Global Consultancy Ltd online and Paper application form Online registration form References (Collected from your previous employer(s)) Interview notes Right to work in the UK check (passport, visa) Criminal record check (Collected from Experian)
Information to enable us to pay you	<ul style="list-style-type: none"> Bank account information National Insurance Number Schedule to work and working hours Attendance records
Information required to access buildings and systems	<ul style="list-style-type: none"> CCTV footage Image used for security passes Monitoring security access to SM Global Consultancy Ltd premises
Information about your terms of employment and information captured as part of your contract administration	<ul style="list-style-type: none"> Offer letter Contract of employment Health Information Qualifications Annual Leave information Bonus payment information Promotion/Transfer/Secondment information Additional allowances
Information relating to SM Global Consultancy Ltd People processes (performance management, capability, grievance, and disciplinary)	<ul style="list-style-type: none"> Minutes from interviews and meetings Email correspondence – including warnings issued to you and related correspondence Assessments, appraisals performance reviews and ratings, training you have participated in, performance improvement plans and any related correspondence
Any other information	<ul style="list-style-type: none"> For example, images from corporate events or information about beneficiaries and dependants in order to administer

	certain elements of your contract and benefits package.
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The organisation collects this information in a variety of ways. For example, data is collected through application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment (such as benefit nomination forms); from correspondence with you; or through interviews, meetings or other assessments.

In some cases, the organisation collects personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law.

4. Why does SM Global consultancy Ltd process personal data?

SM Global consultancy Ltd, needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. For example, we need to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefit, pension and insurance entitlements.

In some cases, we need to process data to ensure that we are complying with legal obligations. For example, we may be required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

In other cases, SM Global consultancy Ltd has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows the us to

- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;

- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- provide references on request for current or former employees;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Where we rely on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes). Information about trade union membership is processed to allow the organisation to operate check-off for union subscriptions.

We process other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring

5. Why do we collect and how do we use this information

Reason for collecting your data	Example of use
Recruitment	To assess your suitability to the role To conduct screening, assessments, and interviews To maintain communication during recruitment stage
Pre-employment vetting	To carry out: Criminal record checks Previous employment reference checks (up to 6 years depending on the role)
To administer your contract of employment and general HR or business administration purposes	Payroll Completing company induction Performance management and succession planning Business travel and expenses

	Flexible working arrangements Adhering to Health & Safety good practice Mandatory regulatory training Visa renewal applications Benefits administration Pension administration Provision of references
To make SM Global Consultancy Ltd a better place to work	Diversity monitoring Equal Opportunities monitoring
Legal and Regulatory	Anything we are required or permitted to do to meet our regulatory and good governance obligations; to meet our legal obligations (e.g. HMRC tax legislation compliance) and obligations we have in relation to the prevention and detection of crime (including fraud)

6. Consent

There may be times where we need to obtain your explicit consent to collect and use your personal information (for example, when we process sensitive personal information for equal opportunities monitoring). If we ask for your consent to process your personal information, you may withdraw your consent at any time (see section 10).

7. Legal basis for using your information

We will only collect, use and share your information where we have a valid reason to do so. We have 3 main reasons for using your information:

Contract – to fulfil our obligations to you under your employment contract. In order to perform that contract we need certain information from you (e.g. contact details and bank account details).

Legal obligation – we may need certain information from you in order to meet our legal obligations (e.g. proof of identity to meet our anti-money laundering obligations, our health and safety obligations to you, or our obligations to a third party (e.g. the taxation authorities))

To meet our legitimate interests in order to protect our business – (e.g. we will undertake checks to safeguard our business and our people against criminal activity). When we process personal information to meet our legitimate interests we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.

8. Who has access to your data

Your information will be shared internally, including with members of the HR and recruitment team (including payroll), your line manager, managers in the business

area in which you work and IT staff if access to the data is necessary for performance of their roles.

We share your data with third parties in order to obtain pre-employment references from other employers, obtain employment background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service. We may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

We also share your data with third parties that process data on your behalf, in connection with payroll, the provision of benefits and the provision of occupational health services. Client payroll portal to upload information in relation to providing work and processing payroll on behalf of the workers. We share your contact details (mobile numbers) with clients to ensure you are able to get work and can be contacted during your shift if required.

9. Who do we share your information with?

Who do we share information with?	Why
Third parties	We use a third party to support us with the administration of your pension and flexible benefits, IT service providers to help us to manage our email and messaging services and analyse information; dedicated payroll/invoice software to manage staff and process payroll; fingerprint recognition systems to record working works to process payroll, and training providers to help us support your learning and development needs.
Clients	We share your telephone number with clients in order for them to contact you to confirm work and hours for the purpose of processing payroll.
Other companies within the SM Global Consultancy Ltd Group	We will share some information across The SM Global Consultancy Ltd Group as may be required for administration, analysis, and Group statutory reporting purposes
Anyone you ask us to	If you ask us to share your information e.g. providing a reference to a prospective employer, we will check with you to confirm that the person asking for information on your behalf has your authority to do so.
Regulatory, government and industry bodies e.g. HMRC Fraud Prevention Organisations	To comply with our legal and regulatory obligations.

Credit reference agencies Law enforcement bodies	
Those involved in any legal process including law enforcement authorities, courts, regulators, government authorities or other third parties	If a court requires us to disclose your information or if it needs to be disclosed as part of a legal process, or to enable us to meet a legal or regulatory obligation, or otherwise to protect our rights, or the rights of any third party.
Anyone in the future who may buy or merge with our business	If we merge with another company or if we are sold then we may need to share your information with the other party depending on the nature of the transaction
Information required to submit regulatory approvals (where required for your role, for example if you undertake a controlled function or Senior Insurance Management role)	<ul style="list-style-type: none"> - Full employment history, including reasons for leaving, for the last 5 years - Criminal proceedings including any convictions, summons and investigations (current, historic, pending and in progress) - Civil proceedings, such as CCJ's and bankruptcy (current, historic, pending and in progress) - Business and employment matters, including directorships for the last 10 years and any disciplinary, misconduct/malpractice investigations/proceedings and material complaints from previous clients - Regulatory matters, including regulatory investigations, disciplinary action, associated proceedings/convictions (current, historic, pending and in progress) and details of historic refusal/revocations of regulatory approvals/licences

10. Where do we send your information?

We operate primarily in the United Kingdom.

11. What if you don't provide personal information?

You have some obligations under your employment contract to provide us with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide the organisation with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable the organisation to enter a contract of employment with you. If you do not provide other information, this will hinder the organisation's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

12. Your rights

We have explained your rights below, but to keep things simple we have not included all the circumstances or conditions which apply to them. **If you would like to exercise these rights please contact our HR department on the numbers at the end of this notice and completing a subject access request form.** If for any reason the right is limited or doesn't apply we will explain to you why this is the case.

Stop using my information– In certain circumstances you can ask us to stop using your information. If we can stop using your information we will, but sometimes we have to use your information for legal reasons. If we cannot comply with your request then we will contact you to explain why.

Access - you have the right to ask for a copy of the information that we hold about you in the form of a Subject Access Request. We only charge a fee in exceptional circumstances. For your security, we will take reasonable steps to confirm your identity before providing you with any personal information we may hold about you. You may address any Subject Access Requests to the SM Global Consultancy Ltd Data Protection Officer whose contact details appear at the end of this document. The SM Global Consultancy Ltd Data Protection Officer will be able to assist you with any questions that you may have about exercising this right.

Transfers–in certain circumstances you can request that we transfer information we hold about you to you, or a third party in electronic form.

Remove my information – in certain circumstances you can ask us to stop using and/or delete your information. If we can delete your information we will, but sometimes we have to maintain records for legal reasons. If we cannot comply with your request then we will contact you and explain why.

If we have shared the personal information in question with another company we will also let them know that you have asked us to stop using or retaining your information, where it is reasonably practicable to do so.

13. How to update your information

It is important that the information we hold about you is accurate and up to date. Please let us know if your information changes, or the information we hold about you is incorrect. You are able to update your details by contacting the payroll team in each of the SM Global Consultancy Ltd Offices, who will be able to assist you with updating your records.

If we have disclosed the personal information in question to another company (including another company within the SM Global Consultancy Ltd Group), we will also let them know about the changes where it is practicable to do so.

14. How long do we keep your information?

We will retain your personal information for a period of time that enables us meet our legal and regulatory responsibilities which will vary depending on the nature of the information; and defend or bring any existing or potential legal claims.

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of your personal information.

15. Changing this privacy notice

We may change this privacy notice from time to time to keep it up to date, or to comply with legal requirements. Any changes we make in the future will be posted on this page and we will notify you of any material changes.

16. SM Global Consultancy Ltd contact details

If you have any questions or concerns about our use of your information or would like a copy of the information we hold about you, please write to:

SM Global Consultancy Ltd Data Protection Officer
Bradley's Business Centre
1st Floor
Central Way
North Feltham Trading Estate
Feltham
TW14 0XQ
Telephone: +44203 601 8820 Ext 224 Email: HR@Staffingmatch.co.uk

17. HR contact details

For general queries regarding the use of your personal or sensitive information please contact the HR department using the following details:

Email: HR@Staffingmatch.co.uk
Telephone: 0203 601 8820 Ext 224

18. Complaints

If you are unhappy with any aspect of the use of your data, please let us know using the HR department details above. You have the right to complain to the Information Commissioner whose contact details are:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

<https://ico.org.uk/global/contact-us/>

19. Key Terms

“SM Global Consultancy Ltd People” and **“you”** mean prospective, present, and past employees, directors, Non-Executive Directors, Committee Members of the SM Global Consultancy Ltd Life Company Boards, contractors, and agency staff undertaking work for SM Global Consultancy Ltd.

“personal information” means information about you, and from which you could be identified, including information which may be protected under the privacy or data protection laws of the country in which you are employed.

“sensitive information” means information that could be used in a discriminatory way and is likely to be of a private nature. This includes ‘special category’ data which includes (but is not limited to) race, ethnic origin, religion, health information, and sexuality; and information about criminal convictions.