**PRIVACY NOTICE**

**Clarke Pro Compliance Limited** (“CPC”) are committed to protecting and respecting your privacy.

 This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

 The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation which replaced the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Even though the UK has left EU in, the GDPR is applicable in the UK. The Government intends for the GDPR to continue in UK law post Brexit and has also introduced a Data Protection Bill to replace the current Data Protection Act in due course.

 Your rights under the GDPR are set out in this notice.

 Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of data protection legislation in force from time to time the data controller is **Clarke Pro Compliance Limited**, Registered address C/O Melwoods 575-599 Maxted Road, Hemel Hempstead Industrial Estate, Hemel Hempstead, England, HP2 7DX.

**Our nominated representative is Jonathan Clarke,**[jon@cproc.pro](mailto:jon@cproc.pro)

**Who are CPC and what do we do?**

We are a specialist compliance partner for the international recruitment sector. We collect the personal data of the following types of people to allow us to undertake our business;

* Prospective and live client contacts;
* Supplier contacts to support our services;
* Employees, temporary workers, apprentices;
* Contractors both prospective, active and passive.

We collect information about you to carry out our core business and ancillary activities.

**Information you give to us or we collect about you.**

This is information about you that you give us by filling in forms on our site [www.cproc.pro](http://www.cproc.pro) (our site) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, to enter our database, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site.

The information you give us or we collect about you may include your name, address, private and corporate e-mail address and phone number, financial information (including bank account details), compliance documentation (tax & social security references) and references verifying your qualifications and experience and your right to work in the United Kingdom or any other country, curriculum vitae and photographic identification, links to your professional profiles available in the public domain, e.g. LinkedIn, Twitter, business Facebook or corporate website.

Once you are registered as a contact of CPC, we may be required, by governments, legislative and tax authorities in the countries we operate in, to retain your data for a statutory amount of time; we always operate according to these requirements. This means, you may have no ‘right to be forgotten’ as we may be required by law to hold your personal data.

**Information we collect about you when you visit our website.**

With regard to each of your visits to our site we will automatically collect the following information:

technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information if applicable, browser type and version & information about your visit, including the full Uniform Resource Locators (URLs)

**Information we obtain from other sources.**

We are working closely with third parties including business partners, sub-contractors, recruitment process outsourcers (RPO), payment and other service providers, advertising networks, analytics providers, search information providers, credit reference agencies, professional advisers and others. We may receive information about you from them for the purposes of our principal services and ancillary support services.

**Purposes of the processing and the legal basis for the processing**

We use information held about you in the following ways:

To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us or we think will be of value to you because it is relevant to your assignment or to your organisation.

To provide you with information about other services we offer that are similar to those that you have already purchased, been provided with or enquired about.  For example, we may provide information about compliance in more than one country if you have multiple opportunities as a contractor.

Our legal basis for the processing of personal data is, our legitimate business interests and invariably we also rely on contractual necessity (both described in more detail below) legal obligation and consent for specific uses of data.

We will rely on contractual necessity if we are negotiating or have entered into an agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on you to fulfil our legal obligations.

We will, in some circumstances, rely on consent for particular uses of your data and you will be asked for your express consent, if legally required.

**Our Legitimate Business Interests & Contractual Necessity**

Our legitimate interests in, and the contractual necessity of, collecting and retaining your personal data is described below:

To maintain, expand and develop our business we need to record the personal data of prospective contractors and client contacts.

**Consent**

Should we want or need to rely on consent to lawfully process your data we will request your consent verbally, by email or by an online process for the specific activity we require consent for and record your response on our system.  Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

**Other Uses we will make of your data:**

* Use of our website;
* to notify you about changes to our service;
* to ensure that content from our site is presented in the most effective manner for you and for your computer.

We will use this information:

* to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
* to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
* to allow you to participate in interactive features of our service, when you choose to do so;
* as part of our efforts to keep our site safe and secure;
* to measure or understand the effectiveness of advertising  to you and others, and to deliver relevant advertising to you;
* to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

[We use cookies on this website](https://www.6catsint.com/cookies).

A cookie is a text file sent by a web server to a web browser and stored by the browser. The text file is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser. We may send a cookie which may be stored on your browser on your computer’s hard drive. We may use the information we obtain from the cookie in the administration of this website, to improve the website’s usability and for marketing purposes. We may also use that information to recognise your computer when you visit our website, and to personalise our website for you. Most browsers allow you to refuse to accept cookies. (For example, in Internet Explorer you can refuse all cookies by clicking ‘Tools’, ‘Internet Options’, ‘Privacy’, and selecting ‘Block all cookies’ using the sliding selector). This will, however, have a negative impact upon the usability of many websites.

**Disclosure of your information inside and outside of the EEA**

We will share your personal information with:

Any member of our group both in the EEA and outside of the EEA.

Selected third parties including:

* business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you, this includes advisers and payment processors;
* subcontractors including email marketing specialists, event organisers, payment and other financial service providers
* analytics and search engine providers that assist us in the improvement and optimisation of our site;

We will disclose your personal information to third parties:

* In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
* If CPC or substantially all of its assets are acquired by a third party, in which case personal data held by it will be one of the transferred assets.
* If we are under a duty to disclose or share your personal data in order to comply with any legal obligation. This includes exchanging information with legal authorities, other companies and organisations for the purposes of fraud protection and credit risk reduction.

The lawful basis for the third-party processing will include:

* satisfaction of their contractual obligations to us as a data processor;
* for the purpose of a contract in place or in contemplation thereof;
* to fulfil their legal obligations.

**Where we store and process your personal data**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (”EEA”). It may be transferred to third parties outside of the EEA for the purpose of our contractor management and payment services. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our contractor management and payment services and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice. All our third party Data Processors are  screened to ensure they are in full compliance with all aspects of Data Security legislation.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, specifically your individual portal, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access

**Retention of your data**

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it to fulfil our legal obligations, particularly for international tax authorities, and for our legitimate business interests and that you are happy for us to do so.

**Your rights**

You have the right to ask us not to process your personal data for marketing purposes. We will inform you in the unlikely event that we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your personal data.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

**The GDPR provides you with the following rights. To:**

* **Request correction**of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
* **Request erasure**of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below). Please be aware that we may not be legally allowed to erase your information if we have had a contractual arrangement involving any sort of payment anywhere in the world.
* **Object to processing**of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
* **Request the restriction of processing**of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
* **Request the transfer**of your personal information to another party in certain formats, if practicable.
* **Make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner’s Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

**Access to information**

The Data Protection Act 1998 and the GDPR give you the right to access information held about you.  We also encourage you to contact us, and if you are a contractor use your portal,  to ensure your data is accurate and complete.

Your right of access can be exercised in accordance with the Act (and the GDPR once it is in force).

A subject access request should be submitted to [jon@cproc.pro](mailto:jon@cproc.pro)

No fee will apply.

**Changes to our privacy notice**

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

**Contact**

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to [jon@cproc.pro](mailto:jon@cproc.pro)