



Marcus Webb Associates - Transparency Notice

Marcus Webb Associates Limited is a company registered in England and Wales under company number 09902894 and whose registered office is at 71-75 Shelton Street, London, United Kingdom, WC2H 9JQ.

1 What is the purpose of this document?

- 1.1 This transparency notice describes how we collect and use personal information about you during and after your relationship with us.
- 1.2 We are a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you, and for explaining this clearly to you.
- 1.3 In this transparency notice, we refer to our “contract” with you. Whilst the word “contract” sounds formal, we are simply referring to the relationship between you and us.
- 1.4 This notice applies to all candidates, contractors, clients and users of our website www.marcus-webb.co.uk.
- 1.5 It is important that you read this transparency notice so that you are aware of how and why we are using your personal information.



2 Information we collect from you and about you and how our use complies with the law

Information	How we use your information	How our use complies with the law
<p>We will collect, store and use the categories of personal information about you listed in this table below. We collect this personal information from you directly when you register to use our services and during the provision of our services to you.</p>	<p>We will use all of the categories of information below primarily to perform our contract, or to take steps prior to entering into our contract, with you.</p>	<p>We will only use your personal information when the law allows us to do so.</p> <p>Most commonly, we will use your personal information in the following circumstances:</p> <ol style="list-style-type: none"> 1) where it is necessary to perform the contract we have entered into with you; 2) where we need to comply with a legal obligation; and 3) where it is necessary for our legitimate interests (or those of a third party) to ensure the smooth running of our or their business. <p>We are allowed to do this as long as our or their activities do not disproportionately intrude your privacy.</p> <p>We will also use your personal information in the following situations, which are likely to be rare:</p> <ol style="list-style-type: none"> 1) where we need to protect your vital interests or someone else's vital interests; or 2) otherwise with your consent. <p>Some of the above grounds for processing your personal information will overlap, and there may be several grounds which justify our use of this information.</p>

Please note that the details and explanations above apply to sections 1 - 5 of this table.



1. Candidates and Contractors - Information we collect from you

<p>Name, personal and business addresses, email addresses and telephone numbers.</p>	<p>To contact you to provide support in relation to your work.</p> <p>To contact you about jobs or assignments that we think you might be interested in.</p> <p>To manage our relationship with you.</p> <p>To administer the contract we have entered into with you.</p>	<p>Because it is necessary to perform the contract we have agreed with you; and</p> <p>because it is necessary for our legitimate interests and those of our clients (your employer/engager) to ensure the smooth running of our or their business.</p>
<p>Age, gender and date of birth</p>	<p>To confirm your identity.</p>	<p>Because it is necessary to perform the contract we have agreed with you; and</p> <p>because it is necessary for our legitimate interests and those of our clients (your employer/engager) to ensure the smooth running of our or their business.</p>
<p>References, proof of your experience, work history and employment records (including job titles, location of employment or workplace and notice period).</p>	<p>To ascertain your fitness to work, assessing experience for a particular job or assignment and making a decision about your eligibility to do a job or assignment.</p>	<p>Because it is necessary to perform the contract we have agreed with you; and</p> <p>because it is necessary for our legitimate interests and those of our clients (your employer/engager) to ensure the smooth running of our or their business.</p>





1. Candidates and Contractors - Information we collect from you (continued)

<p>Education, training, qualifications and authorisations history.</p>	<p>To ascertain your fitness to work, to assess your qualifications for a particular job or assignment and to make decisions about your eligibility to do a job or assignment.</p>	<p>Because it is necessary to perform the contract we have agreed with you; and because it is necessary for our legitimate interests and those of our clients (your employer/engager) to ensure the smooth running of our or their business.</p>
<p>Other information you voluntarily provide in a CV or cover letter or as part of the application process.</p>	<p>To ascertain your suitability for a particular job or assignment. To administer our contract with you.</p>	<p>Because it is necessary to perform the contract we have agreed with you; and because it is necessary for our legitimate interests and those of our clients (your employer/engager) to ensure the smooth running of our or their business.</p>
<p>Your compensation history</p>	<p>To find suitable jobs or assignments for you.</p>	<p>Because it is necessary to perform the contract we have agreed with you; and because it is necessary for our legitimate interests and those of our clients (your employer/engager) to ensure the smooth running of our or their business.</p>
<p>Right to work documentation (for example a passport, driving licence, birth certificate or Immigration Status Document as set out in the Home Office's right to work checklist, which can be found here).</p>	<p>To check you are legally entitled to work in the UK, or other country or territory in which we are placing you. To confirm your identity.</p>	<p>To allow us to comply with our legal obligation; and because it is necessary for our legitimate interests and those of our clients (your employer/engager) to ensure the smooth running of our or their business.</p>



1. Candidates and Contractors - Information we collect from you (continued)

<p>If you are a contractor and are self-employed, proof of your registration for self-employment with HMRC.</p>	<p>Checking your self-employed status for tax purposes.</p> <p>To prevent fraud.</p>	<p>To allow us to comply with our legal obligation; and</p> <p>because it is necessary for our legitimate interests and those of our clients (your employer/engager) to ensure the smooth running of our or their business.</p>
<p>If you are a contractor, details of your bank account.</p>	<p>To pay any sums due to you.</p>	<p>Because it is necessary to perform the contract we have agreed with you.</p>
<p>If you are a contractor your National Insurance Number and UTR (unique taxpayers reference)</p>	<p>To administer the contract we have entered into with you.</p> <p>To ensure that we process your payroll and taxes in compliance with legal obligations.</p>	<p>To allow us to comply with our legal obligation; and</p> <p>because it is necessary for our legitimate interests and those of our clients (your employer/engager) to ensure the smooth running of our or their business.</p>
<p>Right to work documentation (for example a passport, driving licence, birth certificate or Immigration Status Document as set out in the Home Office's right to work checklist, which can be found here.)</p>	<p>To check you are legally entitled to work in the UK, or other country or territory in which we are placing you.</p> <p>To confirm your identity.</p>	<p>To allow us to comply with our legal obligation; and</p> <p>because it is necessary for our legitimate interests and those of our clients (your employer/engager) to ensure the smooth running of our or their business.</p>
<p>Your pay and benefits information.</p>	<p>To administer the contract we have entered into with you.</p> <p>To ensure that we process your payroll and taxes in compliance with legal obligations.</p>	<p>To allow us to comply with our legal obligation;</p> <p>because it is necessary to perform the contract we have agreed with you; and</p> <p>because it is necessary for our legitimate interests and those of our clients (your employer/engager) to ensure the smooth running of our or their business.</p>



1. Candidates and Contractors - Information we collect from you (continued)

<p>Relationship status and information about your partner and dependants.</p>	<p>If you discuss relocation with us we would ask for information about your partner and your dependants so we can discuss the feasibility of the move with you.</p>	<p>Because it is necessary to perform the contract we have agreed with you; and</p> <p>because it is necessary for our legitimate interests and those of our clients (your employer/engager) to ensure the smooth running of our or their business.</p>
<p>If you are a contractor, next of kin and emergency contact information.</p>	<p>In case you are involved in an accident or other emergency situation.</p>	<p>To protect your vital interests or someone else's vital interests; and</p> <p>because it is necessary for our legitimate interests and those of our clients (your employer/engager) to ensure the smooth running of our or their business.</p>

Particularly sensitive personal information. We may also collect, store and use the following special categories of more sensitive personal information:

<p>Information about your physical or mental health, or disability status.</p>	<p>To assess your fitness to work.</p> <p>To help your employer/engager make appropriate workplace adjustments.</p> <p>Where appropriate, to monitor and manage sickness absence and to administer benefits.</p>	<p>Because it is necessary to perform the contract we have agreed with you; and</p> <p>because it is necessary for our legitimate interests and those of our clients (your employer/engager) to ensure the smooth running of our or their business.</p>
<p>Information about your race or ethnicity (from your passport) religious, philosophical or moral beliefs, or sexual orientation.</p>	<p>Passport information - to verify your identity and right to work in the UK or other country or territory in which we are placing you.</p> <p>We and our clients may collect information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual orientation from you, to ensure meaningful opportunity monitoring and reporting.</p>	<p>To allow us to comply with our legal obligation; and</p> <p>because it is necessary for our legitimate interests and those of our clients (your employer/engager) to ensure the smooth running of our or their business.</p>



1. Candidates and Contractors - Information we collect from you (continued)

<p>Information about criminal convictions and offences.</p>	<p>If it is appropriate given the nature of the role and where we are legally able to do so, we will use information about any spent or unspent criminal convictions and offences to assess your suitability (or to enable our clients to assess your suitability) for certain positions. This may include carrying out background checks, where necessary.</p>	<p>Because it is necessary for our legitimate interests (or those of a third party) to ensure the smooth running of our or their business; and</p> <p>to protect your vital interests or someone else's vital interests.</p>
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2. Candidates and Contractors - Information we collect about you

We will collect information throughout the registration/application and placement process from third party sources including online job boards and professional media sites such as LinkedIn.

Information	How we use your information	How our use complies with the law
<p>As explained above.</p>	<p>As explained above</p>	<p>As explained above</p>
<p>Information about your employment and education history, skill set and availability for work opportunities.</p>	<p>To assess your suitability and availability for vacancies.</p>	<p>Because it is necessary for our legitimate interests to ensure the smooth running of our business.</p>





3. Candidates and Contractors - Information we receive from third parties

We will sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

Information	How we use your information	How our use complies with the law
As explained above.	As explained above.	As explained above.
References, proof of your experience, training, qualifications and authorisations.	To ascertain your fitness to work, assessing qualifications for a particular job or assignment and making a decision about your eligibility to do a job or assignment.	Because it is necessary to perform the contract we have agreed with you; and because it is necessary for our legitimate interests (or those of a third party) to ensure the smooth running of our or their business.
If we place you we will collect performance information about your placement including feedback about you and your performance from your employer/engager.	To keep a record of our placements for our own management and compliance purposes. Where applicable, to manage our relationship with you and your employer/engager.	Because it is necessary to perform the contract we have agreed with you; and because it is necessary for our legitimate interests (or those of a third party) to ensure the smooth running of our or their business.



4. Clients - Information we collect from you

Information	How we use your information	How our use complies with the law
As explained above.	As explained above.	As explained above.
The name, job title and business contact information of your employees and other representatives.	To deliver our services to you.	This processing is necessary to perform the contract between us and our client.
Information about the directors and shareholders of our client.	To carry out our internal due diligence procedures.	To allow us to comply with our legal obligation; and because it is necessary for our legitimate interests (or those of a third party) to ensure the smooth running of our or their business.

5. Users of our Website- Information we collect from you

Information	How we use your information	How our use complies with the law
As explained above.	As explained above.	As explained above.
Information collected via our website about your use of our website (including your IP address, your login information, browser type and version).	To deliver our Services to you. To monitor your use of our information and communication systems. To ensure compliance with our IT policies. To help ensure network and information security.	It is necessary for our legitimate interests to ensure the smooth running of our website and business.



3 Who are we going to share your personal information with and what will they do with it?

- 3.1 For candidates and contractors, we may share your personal information with:
- 3.1.1 our clients as prospective employers/engagers;
 - 3.1.2 our clients as employers/engagers;
 - 3.1.3 third party software providers used by our clients to facilitate the recruitment process. For example, providers of Applicant Tracking Software;
 - 3.1.4 any agency or service company with, or via, which you are contracted to work;
 - 3.1.5 HMRC and any other government bodies as required by law;
 - 3.1.6 if we have previously placed you in a contractor or permanent position, we may provide a reference to any future employer/engager we place you with; and
 - 3.1.7 any potential or actual purchaser of our business or assets.
- 3.2 If you are an employee or other representative of our client, we may share your personal information with:
- 3.2.1 our candidates to facilitate the recruitment process, for example to arrange interviews; or
 - 3.2.2 any potential or actual purchaser of our business or assets.
- 3.3 If you object to our sharing or continuing to use your personal information with any person please contact us at hello@marcus-webb.co.uk.
- 3.4 We may share your data with third-party service providers that provide certain services on our behalf. For example, the provider of our Client Relationship Management System, the provider of our CV parsing tool, and the providers of our contractor payroll and administration services.
- 3.5 All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes.
- 3.6 We will also share your personal information where we are under a legal obligation to do so, for example for fraud prevention.



4 If you fail to provide personal information

4.1 In order for us to provide our service, we need you to provide the personal information set out in section 2 of this notice. If you choose not to provide certain information when requested, we may not be able to perform our services for you.

5 Informing us of changes

5.1 It is important that the personal information we hold about you is accurate and current. To allow us to do so, please keep us informed if any of your personal information changes during your working relationship with us by email to hello@marcus-webb.co.uk.

6 Change of purpose

6.1 We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

6.2 Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.

7 Automated Decision-Making

7.1 We do not envisage that any decisions will be taken about you using automated means, however we will notify you if this position changes.

8 Where will we store your personal information?

8.1 Any personal information that you submit to us will be held on secure servers, based within the European Economic Area (EEA).

9 Transferring information outside the EEA

9.1 We may transfer information about you outside the EEA. We will only do so where necessary for a specific job or assignment opportunity and with your consent.

10 Data Security

10.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.



11 How long will we use your personal information for?

11.1 Except as set out in paragraph 11.2 below:

11.1.1 For candidates and contractors, we will keep your personal information for up to five years if we place you in a role, and for up to three years if we do not place you, from our last point of contact;

11.1.2 for employees and representatives of our clients, we will keep your personal information for up to three years from our last point of contact with you.

11.2 We may be required to keep some of your personal information for longer to comply with our legal obligations as a recruitment agency. Where this is the case, we will keep your personal information for the period required by law (which will usually be six years from our last point of contact with you).

11.3 Once the retention period has expired, we will securely delete your data in accordance with our data retention policy.

12 Your rights

12.1 You have the following rights:

12.1.1 to be told what we are doing with your personal information. We do this by providing you with this transparency notice;

12.1.2 to request us to correct or update the personal information we hold about you;

12.1.3 to object to the processing of your personal information;

12.1.4 to request a copy of the personal information we hold about you;

12.1.5 to ask us to delete the information that we hold about you where there is no good reason for us continuing to process it;

12.1.6 to ask us to stop processing your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground;

12.1.7 to ask us to restrict how we use your personal information for a period of time if you claim that it is inaccurate and we want to verify the position or in some limited other circumstances;

12.1.8 to ask us to send your personal information to another organisation in a computer-readable format;



12.1.9 to complain to the Information Commissioner's office if you are unhappy with our use of your personal data: you can do this at <https://ico.org.uk/concerns/>. Please contact us straight away if you consider that we are not handling your personal information properly so we can try and sort the problem out.

12.2 If we delete your personal information or restrict our use of it, we will not be able to provide our services to you.

12.3 If you want to exercise any of your rights, please contact hello@marcus-webb.co.uk. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

13 Changes to this transparency notice

13.1 We reserve the right to update this transparency notice at any time, and we will provide you with a new transparency notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

13.2 If you have any questions about this transparency notice, please contact hello@marcus-webb.co.uk.

14 Contact us

14.1 If you have any questions about this transparency notice, please contact hello@marcus-webb.co.uk.

