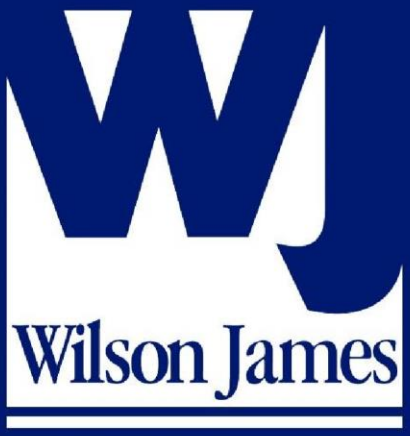

WILSON JAMES LTD

OTHER SOURCES PRIVACY NOTICE

23rd September 2020

V1.2

OTHER SOURCES PRIVACY NOTICE

Title	Other Sources GDPR Privacy Notice	**Date Issued**	Sep-20
Owner	The Data Protection Officer	**Date Reviewed**	Oct-21
Scope	This privacy notice applies where the personal information did not come directly from the data subject. Examples of this situation are next of kin, emergency contacts, recommend a friend, expression of wish and job references. Applying GDPR Article 14, paragraph 3 (b), these privacy notices must be provided at the latest, when the first communication takes place. It should be noted that for completeness, the specific reason for their information being processed, and the name of the individual (staff member) who has provided their information should also be communicate, along with this privacy notice.		

About Us

Wilson James Ltd (or 'Us') is registered in England, with the trading address: Chalkwell Lawns, 648-656 London Rd, Westcliff on Sea, Essex, SSO 9HR. For the purposes of the General Data Protection Regulation (GDPR), Wilson James Ltd is a data controller with respect to the personal data that is stored about you.

Wilson James is committed to respecting and protecting your privacy. Questions and comments about this privacy notice are welcomed. These, and any enquiries about the processing of your personal data should be directed to dataprotection@wilsonjames.co.uk in the first instance.

What is Personal Data?

The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified by reference to data items such as: name, contact details, unique identification numbers, location data or online identifiers.

How Wilson James uses your information

Wilson James will process – that means collect, store and use – the information you provide in a manner that is compatible with the GDPR. Wilson James will endeavour to keep your information accurate and up to date and not keep it for longer than is necessary. In some instances, the law sets the length of time information must be kept, but in most cases, Wilson James uses a set of retention rules to ensure that data is not retained any longer than to fulfil the purpose for which is has been collected. These retention rules are contained within a Document Control Standard Operating Procedure.

The aim is not to be intrusive, and Wilson James will not ask irrelevant or unnecessary questions. Moreover, your information will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure. These measures are described in the Wilson James Information Security Policy and the Data Protection Policy.

This privacy notice covers situations where personal data has been provided to us by someone other than you, the data subject. Examples of such situations are where our employees provide us with an

emergency contacts or professional references. The following table lists these circumstances, what information may be collected for each and the purpose of collecting it:

Situation	Data that may be collected	Lawful basis for processing
Emergency Contact	• Name, address and contact information • Relationship to the relevant employee	Legitimate Interests - To enable us to contact you in case of emergency by our employee who has named you as their next of kin and/or emergency contact
Expression of Wish / Next of Kin / Beneficiary details	• Name, address and contact information • Relationship to the relevant employee	Legitimate Interests - To ensure that payments from pensions or death benefits are made to the correct beneficiary.
Recommend a friend	• Name, address and contact information • Outline job history • Skills and qualifications	Legitimate Interests - To enable employees to generate job opportunities for their friends and professional network.
Personal / character references	• Name, address and contact information • Type and duration of relationship to the relevant employee	Legitimate Interests - To enable us to obtain character references and validate aspects of a candidate's job application such as career gaps.
Professional references	• Name, business address and contact information • Type and duration of professional relationship to the relevant employee	Legitimate Interests - To enable us to validate aspects of a candidate's job history and performance.

Upon having this privacy notice communicated to you, Wilson James should also highlight which category you fit into and the identity of the person who gave us your information.

During the processing of your information, no automated profiling or decision making takes place.

Disclosure of your personal data

Wilson James may pass your personal data on to our service providers such as our insurers or pension providers who are contracted to Wilson James. These service providers are obliged to keep your details secure and use them only for the specific services that they provide on our behalf, to you or the employee that has named you. Once this service need has been satisfied, they will dispose of the details in line with Wilson James' retention procedures.

Your rights

You have the right to access information held about you. Where there are any changes to the purposes for which your data is processed, or any changes to the way in which your personal data is disclosed,

you have a right to be informed of these changes. Wilson James will do this by contacting you with the relevant information in a timely and transparent manner.

You have the right to ask for your personal data to be rectified where there is an inaccuracy and you have the right to ask for your personal data to be erased, where there is no overriding legal basis for it to be retained. You have the right to ask for your data not to be processed for marketing purposes and where any processing of personal data is carried out based on your consent, you have the right to withdraw that consent as easily as it was given.

You have the right to object to decisions Wilson James has taken about the processing of your personal data and where you believe Wilson James has contravened the General Data Protection Regulations, you have the right to lodge a complaint with the Information Commissioner's Office.

You have the right to request that processing of your personal data is restricted, where there is an objection or request for rectification pending, or where you require data that would otherwise be deleted to be retained, for example for the defence of legal claims.

For any questions about, or to exercise any of your rights as a data subject, please contact dataprotection@wilsonjames.co.uk.