

Privacy Policy

This policy explains how we process personal data delivering search, operational, consulting and assessment services, including how it affects our website: www.sangfroidgroup.com

Who we are

We are Sangfroid Group Ltd. Further information about us can be found here: www.sangfroidgroup.com

Sangfroid Group Ltd ("we", "us") is committed to keeping your information secure and managing it in accordance with our legal responsibilities, under the privacy and data protection laws of General Data Protection Regulation (Regulation (EC) 2016/679 ("GDPR") in the European Union ("EU").

We are committed to protecting personal information by design and default. We hold only what data we need to complete a specific task, such as processing a candidate's application for a role. We will never sell or pass your data on to a 3rd party without your consent and only then to further the specific reason for which the data has been provided.

We employ Cyber Essentials practices to secure your data from external, unauthorised access to your data.

We will always be open and transparent with you about what data we have and how we use it.

We keep this Privacy Policy under regular review and update it from time to time.

This policy was last updated in April 2024. Please review this policy periodically for any changes.

Who this policy applies to

We provide recruitment, consulting, operational, search and placement services on both a permanent and temporary basis ("our services") to a range of clients globally. Details of our services can be found elsewhere on this website.

This policy applies to you whether you are a candidate for us, one of our clients, a client or whether you are a source or a referee in respect of a candidate or an employee of one of our clients.

Additionally, this policy will apply to you if you attend one of our events or have subscribed to receive information about our services or any of our marketing materials.

For the purposes of this policy, "individual(s)" means an identifiable living person or organisation who is a candidate, applicant, potential candidate, employee of a client. "Client(s)" means any business, firm, organisation, government body or individual that mandates us to perform any of our services. A "referee" is a person who provides a personal or work reference in respect of a candidate and; a source is a person who provides us with information about a candidate.

The type of personal data we collect and process

In all cases, we collect and process personal data about you, including your name, address, telephone number and email address. For some functions we may request sensitive personal information, for which we will ask for your consent.

Candidates

If you proceed with an application, or should we consult you about a role, you may be required to submit additional personal data. For example, date of birth, education and career history, curriculum vitae (CV) or other documentation: some information may be sensitive. Your CV or resume may contain employment history, education, professional qualifications, memberships, details of papers written, references and referees, amongst other things.

Based on your consent, we will also process any relevant medical tests or results from such assessments or tests.

We will not ask for information on your race, gender, sexuality, religious or political beliefs unless they are directly related to a role and then with your consent and following a discussion with you.

For roles that require security clearances or vetting processes we will, with your consent, pass the minimum amount of data to UK-registered and Government approved vetting agencies and/or companies. They may contact you and, with your consent, ask you to provide sensitive data for which they have a limited interest purely for the purpose of processing vetting and obtaining security clearances.

Client

As well as basic contact information we will also collect information about your role and other information provided to us by your organisation.

Source and Referee

As well as basic contact information we will also collect information regarding your credentials as a source, details of your relationship/knowledge of a candidate and your opinions of that individual. We may obtain this information directly from you or publicly available information.

What we do with your data

We will never sell your data to a 3rd party. We may provide access to your data to 3rd parties for the sole purpose of establishing a potential role for you but not beyond that which is strictly necessary for the purpose you provided the data.

We will hold your data on file for the duration of the purpose which you provided it for. When there is no longer a legitimate interest in that data being held, it will be deleted from our records irreparably. If we would like to hold any of your data beyond the time for which it is needed (for example, if we want to hold your data for consideration for new roles in the future), we will ask for your consent to do so. If we do this, we will destroy any data not needed.

For certain roles, we may run an advertisement to which you may respond, either electronically or via mail. Other roles may involve one of our employees or consultants calling you to discuss the details. Then, we will either inform you verbally that we will process your personal data or send you a Data Privacy Notice. Both will direct you to this Privacy Policy.

Besides filling particular vacancies, we also process personal data when we conduct market intelligence exercises to map out particular business sectors or functions to help clients understand the available talent.

Sensitive data

From time to time, we may seek your consent to process personal data in respect of certain specific and limited purposes. We will always do this before processing any sensitive personal data: any criminal data, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning health or sex life and sexual orientation, genetic and/or biometric data. We encourage you not to provide us with sensitive personal data unless it is specifically requested, and we have your consent. We may also request that you undergo background checks and/or vetting for certain roles; again, we will request your consent before doing so. We may ask you to agree to and sign non-disclosure agreements. We will only provide sensitive data to 3rd parties who comply with UK DPA and GDPR. We will not provide any more data than is necessary and we will ensure that they process any data strictly in line with this policy and the UK Data Protection Act/GDPR.

Your right to object and to have your data erased

You are not obliged to provide any personal data to us. However, please note that this may mean we will not be able to consider you in respect of some of our specific services where certain data is needed.

You may withdraw any consent you have previously given, at any time. Also, you have the right to ask us to stop processing any personal data and to have it erased. If you request to have your data erased we will do so irrevocably and immediately. Should you wish to re-engage with us after this you may do so without prejudice and we will seek any appropriate consents from you and start any process anew.

Please note that no automated decisions, such as computerised candidate profiling, are made on the basis of the information we collect. We only collect data for the purpose of a specific requirement and will only use it with your consent for that specific purpose.

Newsletters and job alerts communications

If you would like to receive correspondence from us, we will ask you to provide us with your name, email address, job title, company name and if appropriate for job alerts for your job preferences. We will not seek data on you from 3rd parties in order to send you adverts or information.

When you have indicated you would like to receive correspondence from us, we may send email alerts and bulletins about our services and any roles that might interest you.

You may change your preferences and cease receiving direct information from us at any time by emailing us.

From time to time, we may contact you with updates on our services, terms of business or simply to ensure that the data we hold is current, relevant and up to date.

From time to time we may contact you to request an updated consent from you to hold your data.

Satisfaction surveys

If you take part in a user satisfaction survey, we may ask you to provide us with personal data, including your name, email address, and your views and opinions.

Providing information to others

To help us run our business, and to promote our candidates for the best opportunities, we work closely with trusted partners with whom we need to share personal data. These partners include:

- Our clients, for whom we provide recruitment search services.
- Prospective clients, where we might need to demonstrate an understanding of a particular market and the individuals that work within it.

We will share information only as anticipated within this Privacy Policy and, wherever appropriate, limit disclosure to information in aggregated form, to avoid or limit identifying you personally by making personal information anonymous.

Where we share information with a third party, you will not be contacted by them unless you have given your consent. An example of this would be your agreeing to be contacted by a vetting agency to process a security clearance.

We use a 3rd party data hosting provider – they are fully GDPR compliant and their systems are protected to Cyber Essentials Plus or better to guard against external data breaches.

Third parties

We may also provide information to third party service providers who process information on our behalf. This is to help run some of our internal business operations, including email distribution, IT services and customer services. As part of our agreements with them, these third parties are required to process such data securely and only in accordance with our instructions.

We may sometimes be required to disclose information about you to law enforcement bodies, agencies or third parties, under a legal requirement or court order. We will act responsibly and take account, where possible, of your interests when responding to these requests.

If you are concerned about these arrangements to disclose or share personal data with third parties, you should contact us and ask us not to process your personal data.

Keeping information secure

We invest significant resources to protect your personal data, from loss, misuse, unauthorised access, modification or disclosure. We hold Cyber Essentials accreditation. However, no system can be 100% secure, and so we cannot be held responsible for unauthorised or unintended access that is beyond our reasonable control.

Information about others

If you provide us with information about other individuals, like details of a referee or personal contact, you must ensure they have agreed to this. We would advise you to keep a record of their agreement and provide them with a copy of, or link to, this Privacy Policy. We will ask for consent from these individuals before storing their data. If they decline consent, we will immediately and irrevocably erase any data we have on them.

Keeping your records

We keep your personal data only for as long as required to provide our services, and in accordance with legal, tax and accounting requirements. Where your personal data is no longer required, we will ensure it is disposed of in a secure manner. This may be all or part of the data we hold on you: if a piece of data has become irrelevant to the processing you consented to, it will be permanently erased. Likewise, if any data we hold on you becomes obsolete or incorrect, we will correct it and erase the outdated information.

Where required by law, we may have to hold or disclose information to legal or law enforcement entities and we will notify you if this has happened.

Access rights

You may request copies of your personal data held by us. If you think any of that data is inaccurate, you may also ask us to correct it.

You may request that your data is erased by us and we will do so securely and irrevocably.

To get in touch with us about any of this, please email or write to us at the address below. Please note that we may request proof of identity. We will respond to your requests within 5 working days.

About our websites

This Privacy Policy applies to our websites too, where we process personal data within and through our website: www.sangfroidgroup.com

The primary purpose of our website is to provide you with information regarding the services provided by the Sangfroid Group Ltd and our consultants. You may use our website to view and apply for jobs. The Sangfroid Group Ltd branded site may be owned/run separately from our main website but obeys all aspects of this Privacy Policy.

We may disclose or share personal data with third parties as outlined above to operate our business. If you are concerned about these arrangements, you should not use the website and contact us to ask us not to process your personal data.

Updating your account and preferences

If you register with us, please keep your details up to date, and notify us of any changes to your personal data. You can do this by email.

Analytics

We may use analytics tools and cookies on this website to help deliver our online services, identify any service issues, improve our services, provide content tailored to users' personal preferences, and to monitor site traffic and usage.

These tools may be provided by third-party service providers and may include the collection and tracking of certain data and information regarding the characteristics and activities of visitors to our website.

Cookies

Cookies are small computer files which are downloaded onto your device when you browse the web. They collect information about the way in which you navigate and use this website and the wider web. Information from cookies also allows us to make improvements to our services.

You may delete and block all cookies, or just certain types of cookies, via your browser settings. However, if you choose to block or delete cookies, this may affect the functionality of the website for you. As a candidate, blocking or deleting cookies will not affect your suitability or disadvantage you for applications for any roles.

Third party websites

This Policy only applies to this website. If you land on our site from other websites or move to other ones from our website, you should read their separate privacy policies.

Complaints procedure

If you have a complaint about how we have handled your personal data, contact us using the details below, and we will investigate your complaint. Please use the same contact details to instruct us to cease processing your personal data.

Contacting us

If you have any questions about this Privacy Policy, or would like to exercise your rights with respect to your personal data, please contact us at recruitment@sangfroidgroup.com