



## **Chapple Data Protection Policy**

As a recruitment company Chapple processes personal data in relation to its own staff, job-seekers and individual client contacts. We abide by the principles of the Data Protection Act 1998 and Regulation (EU) 2016/679 set out below.

Chapple holds data on individuals for the following general purposes:

- Staff Administration
- Advertising, marketing and public relations
- Accounts and records
- Administration and processing of job-seekers personal data for the purposes of job-finding services

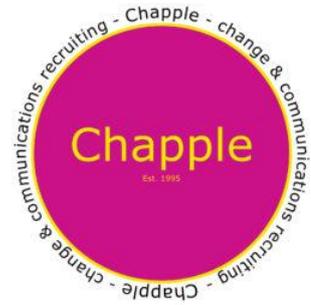
The Data Protection Act 1998 requires that Chapple acts as data controller to process data in accordance with the principles of data protection. These require that data shall be:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant and not excessive
- Accurate
- Not kept longer than necessary
- Processed in accordance with the data subject's rights
- Kept securely
- Not transferred to countries outside the European Economic Area without adequate protection.

Personal data means data, which relates to a living individual who can be identified from the data or from the data together with other information, which is in the possession of, or is likely to come into possession of, Chapple.

Processing means obtaining, recording or holding the data or carrying out any operation or set of operations on the data. It includes organising, adapting and amending the data, retrieval, consultation and use of the data, disclosing and erasure or destruction of the data. It is difficult to envisage any activity involving data, which does not amount to processing. It applies to any processing that is carried out on computer including any type of computer however described, main frame, desktop, laptop, palm top etc.

Data should be reviewed on a regular basis to ensure that it is accurate, relevant and up to date.



Data may only be processed with the consent of the person whose data is held. Therefore, if they have not consented to their personal details being passed to a third party this may constitute a breach of the Data Protection Act 1998.

By instructing Chapple to look for work and providing us with personal data contained in a CV job-seekers will be giving their consent to processing their details for work-finding purposes. Consent should be given by a clear affirmative act establishing a freely given, specific, informed and unambiguous indication of the data subject's agreement to the processing of personal data relating to him or her, such as by a written statement, including by electronic means, or an oral statement.

When submitting shortlisted candidates to client's for consideration, Chapple will always seek the candidate's express permission in each case. Once the data is registered with the client, it becomes their responsibility and will comply with their privacy policy, details of which will be freely available on request.

From a security point of view, only permitted staff should add, amend or delete data from the database. However, all staff are responsible for notifying those listed where information is known to be old, inaccurate or out of date. In addition, all employees should ensure that adequate security measures are in place. For example:

- Computer screens should not be left open by individuals who have access to personal data
- Passwords should be changed regularly and not be disclosed
- Email should be used with care
- Personnel files and other personal data should be stored in a place in which any unauthorised attempts to access them will be noticed. They should not be removed from their usual place of storage without good reason
- Personnel files should always be locked away when not in use and when in use should not be left unattended
- Any breaches of security should be treated as a disciplinary issue
- Care should be taken when sending personal data in internal or external mail
- Destroying or disposing of personal data counts as processing. Therefore, care should be taken in the disposal of any personal data to ensure that it is appropriate. For example, shredding sensitive data.

It should be remembered that the incorrect processing of personal data e.g. sending an individual's details to the wrong person; allowing unauthorised persons access to personal data; or sending information out for purposes for which the individual did not give their consent, may give rise to a breach of contract and/or negligence leading to a claim against Chapple for damages from an employee, work-seeker or client contact. A failure to observe the contents of this policy will be treated as a disciplinary offence.

Data subjects, i.e. those on whom personal data is held, are entitled to obtain access to their data on request. All requests to access data by data subjects i.e. staff, members,



customers or clients, suppliers, students etc. should be referred to Suzannah Chapple, Director – 020 7734 8209, [syc@chapple.ltd.uk](mailto:syc@chapple.ltd.uk).

Any requests for access to a reference given by a third party must be referred to Suzannah Chapple and should be treated with caution even if the reference was given in relation to the individual making the request. This is because the person writing the reference also has a right to have their personal details handled in accordance with the Data Protection Act 1998, and not disclosed without their consent.

Therefore, when taking up references an individual should always be asked to give their consent to the disclosure of the reference to a third party and/or the individual who is the subject of the reference if they make a subject access request. However, if they do not consent then consideration should be given as to whether the details of the individual giving the reference can be deleted so that they cannot be identified from the content of the letter. If so the reference may be disclosed in an anonymised form.

Finally, it should be remembered that all individuals have the following rights under the Human Rights Act 1998 and in dealing with personal data these should be respected at all times:

- Right to respect for private and family life [Article 8]
- Freedom of thought, conscience and religion [Article 9]
- Freedom of expression [Article 10]
- Freedom of assembly and association [Article 11]
- Freedom from discrimination [Article 14]

This policy will be available to view on the Chapple website <http://chapple.ltd.uk> with a link provided on all emails sent to individuals.

**Suzannah Chapple, Director**

**Chapple**  
career partners

**Change and Communications Recruitment since 1995**

**+44(0)20 7734 8209**

<http://chapple.ltd.uk>

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