

## thefutureworks – Privacy Notice

### Who are we?

PeoplesFuture Limited (trading as thefutureworks) is committed to protecting your privacy. This Notice will help you understand how we look after your personal data and how we make sure that we meet our obligations to you under the UK data protection laws (referred to in this Notice as the "Data Protection Laws"). This Notice outlines how we will use, store and share your personal data, and supplements any other notices or statements we may provide to you.

In this Privacy Notice, the terms "we", "our", and "us" refer to thefutureworks, the trading name of PeoplesFuture Limited, The Hub, Jordan Well, Coventry, Coventry, United Kingdom CV1 5QT (ICO registration number ZA333567). thefutureworks is a wholly-owned subsidiary of Coventry University Higher Education Corporation. You can find the full details of the Coventry University Group structure [here](#).

We are a controller of your information which means that we are responsible for looking after it. We will use your personal data fairly, lawfully and in a transparent manner, and in accordance with the Data Protection Laws.

### Personal data we collect about you

The type of personal data we collect about you and how we collect it can vary depending on your interactions with us.

"**Personal data**" means information we hold about you from which you can be identified. It may include contact details, identification numbers, other personal information, photographs, expressions of opinion about you or indications as to our intentions about you.

### What information do we collect?

We collect your

- identification and contact data (including first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, passport number, identity card, birth certificate, visa details, national insurance, DBS number (if applicable), university ID number where applicable);
- contact data including address (home, postal or other physical address), email address and telephone numbers;
- application data including your identification and contact data together with your academic and employment history and any other information (including any Special Categories of Personal Data as referred to below) that you include in your CV or application including professional certificates;
- financial data including bank account and national insurance details;
- technical data including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;
- usage data including information about how you use our website, products and services; and

- marketing and communications data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

**Special Category Data**

We may hold information about you that is classified as 'special category data' in the Data Protection Laws, such as details about your ethnicity and racial or ethnic origin, your political opinions, your religious or philosophical beliefs, your trade union membership, your health and any disabilities you may have, your sex life or sexual orientation, your genetic or biometric data and data relating to any criminal (or alleged criminal) offences or convictions, which you have supplied to us.

We will only process this special category data where you have given your explicit consent for us to do so or when that processing is legally required.

**Where do we get your personal data from?**

We collect some of your information directly from you, either through information that you give to us or information that we collect during your visits to our website or through any other communications you might have with us. We also obtain some information from third parties (please see below for further details). Please note that we may combine personal data we receive from other sources with personal data you give to us and personal data we collect about you.

<p><b>Information that you give us</b></p>	<p>You may share personal data about yourself and your circumstances by:</p> <ul style="list-style-type: none"> <li>• providing us with your CV or application and/or completing hard copy application forms;</li> <li>• using our services or requesting information from us;</li> <li>• verbally providing information to us, either by telephone or face to face;</li> <li>• participating in surveys;</li> <li>• giving us information about yourself in any other communications with us either by e-mail, post or otherwise.</li> </ul> <p>We may need you to provide the personal data listed above so that we can provide other services and support your needs, and so that we can comply with our contractual obligations to you, and our legal obligations.</p> <p>If you don't provide this personal data, it may mean that we will be unable to process your application or provide other services that you have requested. If this is the case we will notify you at the time.</p>
<p><b>Information that we collect about you</b></p>	<p>We collect personal data about you:</p> <ul style="list-style-type: none"> <li>• when you visit our website, including details of your visits to our website including, but not limited to, Internet Protocol (IP) address used to connect your computer to the internet, MAC addresses, traffic data, location data, your login information, time-zone setting browser type and version, browser plug-in types and versions, operating system and platform, weblogs, cookies and other communication data, and the resources that you access. For more information</li> </ul>

	<p>please see our <a href="#">Cookies Policy</a>.</p> <ul style="list-style-type: none"> <li>when you are at any of the premises from which we carry on a business from time to time, a Coventry University campus or in circumstances where we may meet you off-site, data including your name and CCTV images. We may also collect personal data about you when we interact with you via Skype or other similar communication platforms.</li> </ul>
<b>Information that we receive from other sources</b>	<p>We may receive personal data about you from third parties, including:</p> <ul style="list-style-type: none"> <li>hirers providing feedback following interviews;</li> <li>previous employers and educational establishments who provide us with references.</li> </ul>

### Why do we need your personal data?

The personal data we collect from you will be used for the following purposes:

- providing our employment agency and employment business services to you for the purposes of identifying suitable employment opportunities, contacting you to discuss vacancies, arranging registration interviews with you, and submitting your CV to potential hirers, in each case for the purposes of performing a contract we have entered with you or in accordance with our legitimate interests as an employment agency and business. Where your application contains Special Categories of Personal Data, we will process such data in accordance with our rights in the field of employment law (to the extent permitted by law) or otherwise where we have your express consent to do so;
- to pay your wages as a temporary agency worker (where they are paid through PeoplesFuture Ltd t/a thefutureworks)
- responding to any enquiries you make or feedback you leave. Your identification and contact data will be used to answer your enquiry as completely and thoroughly as possible and will not be used for any other purpose unless you have requested additional services from us such as to receive our newsletter;
- research - if you choose to complete a survey that we use for research purposes we will retain the information that you provide in response to that survey. Where your survey response includes identification and contact data, this will be processed as necessary for the purposes of our legitimate interests in analysing the needs and interests of our current and prospective candidate and client hirer base, and in furthering and improving our business;
- advertising, marketing and public relations – we may use your identification and contact data, technical and/or usage data to form a view on what we think you may want or need, or what may be of interest to you and in doing so we will only send you information that is deemed relevant to you;
- to monitor how our website is used, including information regarding the number of visitors to the various parts of the website, and to help us to improve the content of the website and to customise the content or layout of the website for you, as necessary for the purposes of our legitimate interests. We collect this information in a way that does not identify you and we do not make any attempt to find out the identities of those visiting our website;

- fault reporting - if you contact us to report a fault with our website, we will use the information provided for the purposes of rectifying that fault as necessary for the purposes of our legitimate interests;
- recruiting - personal data including identification and contact data provided for an employment opportunity with us will be processed so as to allow us to process and evaluate the merits of that application as necessary for the purposes of our legitimate interests;
- we will keep records of attendance (and that of your guests) on visits to Coventry University campus, including visitor logs, details of any payments made, photographs and video recordings in which you may be included (CCTV), in order to operate security;
- as part of the events organised at Coventry University and the associated buildings as necessary for our legitimate interests, third party photographers may be on site. If you do not wish to be included in any photographs or live streamed events (such as graduation ceremonies which are recorded and available online), please ensure that you clearly express your wishes to a member of our staff or directly to the third parties;
- if you submit a Freedom of Information Request or a Data Subject Access Request we will keep a record of that correspondence so as to deal with and/or respond to your request. We need information from you to respond to you and to locate the information you are looking for. This enables us to comply with our legal obligations under the legislation we are subject to. When we receive a request from you, we'll set up an electronic case file containing the details of your request. This normally includes your contact details and any other information you have given us. We'll also store, on this case file, a copy of the information that falls within the scope of your request in order to maintain adequate records of information we have made public and/or released to you;
- if you are a supplier, partner institution, agent, or any other third party working with thefutureworks we will collect, store and use personal information about you when the law allows us to, mainly in circumstances such as: performing a contract we have entered or wish to enter with you, where we need to comply with a legal obligation, where we need to protect your (or someone else's) interests or where it is needed in the public interest or for official purposes;
- to enable us to contact others in the event of an emergency (we will do this based on the presumption that you have checked with the individuals before you supply their contact details to us).

### **Basis for using your personal data**

Data Protection Laws state that we need to have a legal basis for all of the processing of your personal data that we carry out. This means that our processing of your information must be for one of a limited number of legal bases set out in the legislation. The legal bases that we rely on are:

#### **The processing is necessary for the entry into or performance of a contract**

When we provide our services to you, a contract is entered into between us. For us to deal with and/or respond to any enquiry or request made by you prior to entering into this contract, and fulfil our obligations under this contract, we will need to collect, process and share (as further detailed below) your personal data. If you don't give us the personal data we need when we ask for it, or if you object to the type of processing we need to do, or if you exercise your right to have your personal data deleted, it is likely to mean that we cannot enter the contract with you or provide the services under it.

#### **Compliance with a legal obligation**

Sometimes we process your information because we are legally obliged to do so, for example in some of the circumstances listed above, or in relation to the prevention of crime, or because we may be required to share your information with certain statutory bodies (see below for further information about whom we may share your information with).

### Legitimate interests

We may use your personal data (excluding special categories of personal data) as set out in this Privacy Notice where this is necessary for the purposes of the legitimate interests of our business including:

- ensuring the quality of the services we provide;
- analysing the needs and interests of our current and prospective candidate and client hirer base;
- furthering and improving our business, and ensuring its smooth operation.

We are required to carry out a balancing test of our legitimate interests in using your personal data outlined above against your interests and rights under the Data Protection Laws. As a result of our balancing test, which is detailed below, we have determined, acting reasonably and considering the circumstances, that we are able to process your personal data in accordance with the Data Protection Laws on the basis that we do so where this is necessary for the purposes of our legitimate business interests.

<b>Legitimate interest</b>	<p>We have a legitimate interest in processing your information as:</p> <ul style="list-style-type: none"> <li>• you benefit from the provision of the services we provide;</li> <li>• we both benefit from the ability to enforce or apply rights under any contract between us;</li> <li>• we need to assess your suitability for roles as they become available; and</li> <li>• we need to ensure the smooth operation of our recruitment business in order to be able to identify and secure suitable employment opportunities for you.</li> </ul>
<b>Necessity</b>	<p>We consider that it is reasonable for us to process your personal data as it is necessary for the purposes of our legitimate interests outlined above as we process your personal data only so far as is necessary to achieve the purposes outlined in this Privacy Notice.</p>
<b>Impact of processing</b>	<p>We consider that it is reasonable for us to process your personal data for the purposes of our legitimate interests outlined above as the processing of your personal data does not unreasonably intrude on your privacy.</p>

### Consent

Generally, unless otherwise stated, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. We will seek your express consent before we share your personal data with any third party for marketing purposes, or before we send you marketing information on behalf of any third party.

You have the right to withdraw consent to marketing at any time by updating your account preferences or by contacting us.

### **Processing of your personal data**

"**Processing**" means doing anything with the personal data, such as collecting, recording, organising, structuring, storing, adapting or altering, retrieving, accessing, consulting, disclosing, disseminating, aligning or combining, restricting, erasing or destroying or using the data in any way.

We will only process your personal data for the purposes set out above or as we otherwise notify you.

The information you provide will be subject to security measures and procedures to minimise the risk of unauthorised access, loss, theft or disclosure.

Your personal data will not be used for the purposes of automated decision making.

### **How long do we keep your personal data for?**

We will only keep your personal data for as long as we need to in order to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We consider a number of factors in deciding how long to keep your information: the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for processing your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements (i.e. whether particular laws mean we have to keep certain types of document for a certain length of time).

### **Who do we share your personal data with?**

Your personal data will only be disclosed to the employees that have a need for such access, for the purpose it was collected and will not be sold, traded, or rented to any individuals or other entities. However, we may need to share your personal data with other organisations within the Coventry University Group, and with third parties in the following circumstances:

- where you are a candidate: to hirers, where we are putting you forward for an employment opportunity; where you are a hirer: to candidates, where we have put them forward for an employment opportunity and need to provide contact details in connection with interviews;
- on occasion, we need to hire other companies to help us to serve you better and in some of these cases we may need to share personal data that is necessary to perform tasks for us, such as market research or issuing marketing materials;
- it is necessary for the performance of our contract with you, including where we need to take steps to enforce any agreements that may be entered into between us;
- we are under a legal duty to do so in order to comply with any legal obligation;
- to protect the rights, property or safety of our business, our staff and others.

## Keeping your personal data secure

We are committed to the protection and security of your personal data. We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

We have in place procedures and technologies to maintain the security of personal data from the point of collection to the point of destruction. We will only transfer personal data to third parties if they agree to comply with those procedures and policies, or if they put in place adequate measures themselves. We are certified to Cyber Essentials.

## Other countries your personal data will be sent to and why

Your personal data may be transferred across international borders. It may be transferred to countries that have different levels of data protection laws to the United Kingdom.

In particular, we may sometimes need to transfer your personal data outside the European Economic Area (EEA) to other members of the Coventry University Group, partner organisations or our suppliers and service providers. Whenever we transfer your personal data outside of the EEA, we ensure an equivalent level of protection is afforded to it by ensuring safeguards are put in place so that your personal data is only processed in accordance with EU data protection laws:

- We transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- We transfer your personal data to service providers who have agreed to contractual terms approved by the European Commission, which give personal data equivalent protection as in the European Union.
- We transfer your personal data to providers based in the US if they are subject to the EU-US Privacy Shield which requires them to provide equivalent protection as in the European Union to personal data shared between Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA. In the event that the UK leaves the EEA, or if otherwise required, we will ensure that appropriate transfer mechanisms to and from the UK are put in place.

## How we may contact you

Please note that we may contact you by post or by electronic means including telephone, text messages, email, social media messaging, or any other suitable electronic method in connection with the purposes set out above.

## Your Data Protection Rights

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, although we may need to verify the accuracy of the new personal data that you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with local law. Please note, however, that we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal data, which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information that you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

### Exercising your rights

If you wish to exercise any of your above rights, please send a written request to the Information Governance Unit, Coventry University, Priory Street, Coventry, CV1 5FB or email [dsar@coventry.ac.uk](mailto:dsar@coventry.ac.uk).

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### Complaints and Questions

Coventry University Group has appointed a Data Protection Officer to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your

personal information, please contact the Data Protection Officer at the Information Governance Unit, Coventry University, Coventry, CV1 2FB or email [dpo@coventry.ac.uk](mailto:dpo@coventry.ac.uk). You can also contact us at [compliance@thefutureworks.co.uk](mailto:compliance@thefutureworks.co.uk).

If you are not satisfied with Coventry University's Group's proposed resolution of your complaint you have the right to contact the Information Commissioner's Office. Further information can be found on the Information Commissioner's website at [www.ico.org.uk](http://www.ico.org.uk) or via their helpline on 0303 123 1113.

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy 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.

### **Feedback**

If you have feedback for us about this privacy notice, please let us know by emailing [enquiry.igu@coventry.ac.uk](mailto:enquiry.igu@coventry.ac.uk).