

APPLICANT PRIVACY NOTICE

BACKGROUND:

Smith Stone Walters Limited understands that when it is dealing with your personal data, privacy is important to you and that you want to understand how your personal data is used. This Privacy notice is provided to applicants using our services so that you can be reassured about this.

1. Information About Us

Smith Stone Walters Limited

Limited company registered in England under company number

4132445 Registered address: Hanover Place, 8 Ravensbourne

Road, Bromley BR1 1HP VAT number: 769 2748 73

Data Protection Officer: Gary Smith

Email address:

Gary.Smith@smithstonewalters.com

Telephone number: +44 (0)208 461 6660

Postal Address: Hanover Place, 8 Ravensbourne Road, Bromley BR1 1HP

Smith Stone Walters is regulated by the Office of the Immigration Services Commissioner, registration number F200100066

2. What Does This Notice Cover?

We process your personal data on the instructions of your employer or prospective employer and have a contract in place to regulate that. That makes us a processor and your employer a controller.

This Privacy Information explains how we process your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

You have the following rights under data protection laws, but you should contact your employer to exercise these rights:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know about how we use your personal data to provide a service to your employer.
- b) The right to access the personal data we hold about you on behalf of your employer.

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- c) The right to have your personal data we hold on behalf of your employer rectified if any of your personal data held by us is inaccurate or incomplete.
- d) The right to be forgotten, ie. the right to ask us to delete or otherwise dispose of any of your personal data that we hold on behalf of your employer. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (ie. prevent) the processing of your personal data.
- f) The right to object to your employer using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask your employer for a copy of that personal data to re-use with another service or business in many cases.

As we are a processor, we will facilitate any requests made on behalf of your employer and on the instructions of your employer. Your employer should provide you with information about how to do that.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

5. What Personal Data Do You Collect?

We collect some or all of the following personal data (this will vary according to your relationship with us):

- Name;
- Date of birth;
- Gender;
- Nationality;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Salary;
- Profession;
- Past immigration history;
- CV/Resume; and
- Payment information.

6. How Do You Use My Personal Data?

Your employer must have a lawful basis for using personal data. This will be because the data is necessary for them to enter into an employment contract with you or because your employer has a legitimate business interest to use it. Your personal data will be used for one of the following purposes:

- Providing and managing your account.

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- Supplying immigration services to you.
- Communicating with you to provide these services.
- Supplying you with information by email that you have opted-into (you may unsubscribe or opt-out at any time by following the unsubscribe link or emailing Gary.Smith@smithstonewalters.com).

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected and as instructed by your employer. OISC, our regulator, mandates that personal data used for immigration services must be kept for six years and we will retain it on behalf of your employer for at least that period.

8. How and Where Do You Store or Transfer My Personal Data?

We store your data on our own software system and in servers on our own premises. It can sometimes be access by colleagues working in other countries, but your data will not be transferred outside of the UK without your knowledge and we will generally seek your consent to transfer it.

We have carefully considered the security of your data and we have taken appropriate security measures. We have Cyber Essentials accreditation and if you wish any further information about the security of our systems please contact us.

9. Do You Share My Personal Data?

We will share your personal data with other organisations if required for the provision of immigration services. This includes subsidiary companies and the UK Home Office.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be made available on our website, www.smithstonewalters.com.