



11th Hour Events Ltd – Privacy Policy / GDPR Statement

11th Hour Ice Ltd

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11th Hour Events Ltd is committed to protecting the privacy and security of all personal information we hold. It's very important to us to ensure the personal information you provide to us is treated with the utmost respect and your data privacy rights are safeguarded, all in accordance with this GDPR Privacy Statement.

This GDPR Privacy Statement explains how personal information about you may be collected, what we do with your data, the measures we take to keep it secure as well as the rights and choices you have over your personal information. It applies to the personal data of all candidates, clients, work seekers, suppliers, website users and other people whose details we may hold in the course of us carrying out our business.

Within 11th Hour Events Ltd it is necessary for us to process personal data (which may include sensitive personal data – now known as "special data") so that it can provide these services – in doing so, 11th Hour Events Ltd acts as a Data Controller so we are obliged to ensure we only process personal data where we have legitimate grounds to do so.

We take care to protect the privacy of all personal data we hold which will be in compliance with current data protection laws.

1. Collection and use of personal data

The information we have set out below is additional to any personal data we are required by law to process in certain scenarios. We may also hold other relevant personal data that you have provided to us, or information that other parties, such as our client or your referees have provided to us, so this is not an exhaustive list. However, we will ensure the processing of any other data remains consistent with the purpose and legal basis that we already rely on under our GDPR Privacy Statement.

a. Purpose of processing and legal basis

Our events management / production business will collect your personal data and will process your personal data for the purposes of providing you with event management/production services only. This includes for example, contacting you about new equipment, providing quotations to you, and developing and managing our services and relationship with you and our clients.

As a Data Controller, we must have a legal basis to process your personal data. The legal grounds we rely upon are either:

- Where we have a legitimate interest, or
- To comply with a legal obligation that we have, or
- To fulfil a contractual obligation that we have with you, or
- With regard to the recording of telephone calls your consent will be required.

b. Legitimate interest

This is where 11th Hour Events Ltd has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect. Where 11th Hour Events Ltd has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Managing our database and keeping our records up to date;
- Providing services to you and our clients;
- Contacting you to seek your consent where we need it;
- Giving you information about similar products or services that you have used from us.

c. Consent

For incoming calls, we inform you prior to us answering your call that calls maybe recorded. If you object to this then please make this clear to us when we answer your call.

For outgoing calls at the time of a phone call that we wish to record we will ask for your consent to continue to do so. If you do not wish to have the call recorded, please tell us.

If you advise that you do not wish to have your call recorded our staff member will determine whether the call can be continued without recording or, in some circumstances, the call may need to be terminated.

Some call recordings are retained in an electronic format and stored with your other personal data in our database.

d. Recipients of data

11th Hour Events Ltd will process some/all of your personal data and/or special data, as necessary, with the following recipients:

- Clients (whom we may introduce you to)
- Referees who may include former employers, or other persons whom we may seek references from (generally this is to help you to find work, whereby we wish to verify their previous employment details, qualifications and experience)
- Our bank if we need to process payments to you
- Pension providers
- HMRC or other tax/government authorities, as appropriate, where we have made payments to you
- Our own third-party service providers including but not limited to our accountants, insurers, auditors, legal advisors and IT service providers
- Your nominated emergency contacts, whether you are a candidate or one of our staff. Also, in the event of an important or emergency situation, we may pass on the nominated emergency contacts details to the emergency services if necessary and appropriate at the time.

We take great care to ensure your information is kept securely and all appropriate checks are carried out by us to ensure those third parties have and maintain similar standards of data protection.

2. Information collected

Categories of data:

The 11th Hour Events Ltd collects some or all of the following personal data on you:

Personal data:

- Personal details: full name, gender, marital/family status, date of birth/age
- Images of you
- Contact details: postal address, personal email address, home and mobile telephone numbers, IP address if you are a website user
- Immigration status: nationality/citizenship/place of birth/ID Confirmation (usually by means of obtaining copies of your full Birth Certificate, Passport, Visas and/or Identity Card)
- Other ID information such as Driving Licence
- Education, qualifications, certificates and employment history, including your work performance, absence and disciplinary record
- Current remuneration & benefits, along with your expectation of any future pay and benefit package
- Information on your interests and desired job roles and any other needs or wishes concerning your future employment
- Lifestyle/leisure activities
- National Insurance number
- Bank details
- Third-party contact information, specifically your emergency contacts and referee details
- Correspondence, including meeting notes, contemporaneous note of conversations and feedback
- For limited company contractors we will also collect certain information about your business including your VAT registration certificate (if applicable), Certificate of Incorporation, bank details and personal data of your representative(s)
- If you are a client of any of our services, or a supplier of services to us, we need to collect, maintain and use information about your company, and in the context of personal data, this will include details of individuals in your organisation. We generally only collect the names, contact details and position of those individuals. We may also hold other information about those individuals that you or they have passed to us

in the course of our business relationship, or that we have obtained from other sources, such as finance or banking information collected in the course of our due diligence process.

- If you are a Data Subject of one of our clients using our HR, Payroll or Project services, the information we collect is only ever provided to us by our client, or from other parties as agreed with them, such as benefit providers or HMRC, as necessary and at appropriate times during the provision of our services.
- If you are a third party whose data we have received from candidates or staff including referees and emergency contacts we may collect and hold your basic contact details – name, postal or email address, work/home/mobile telephone numbers

Special categories of data & information on Criminal Convictions/Offences:

- Health or fitness information including whether you have a disability
- Details of unspent convictions or spent convictions that must be declared for specific roles you have applied for

Where we hold special data – we are bound by stricter rules. This could be information about your gender, age, sexual orientation, religion, social-economic background and other information such as health-related data. We currently only collect and process such special data where there are legal grounds to do so (e.g., Health & Safety measures, in compliance with the Equality Act with reference to disability access rights). If there is any other wish or need during the course of our working relationship for us to process your special data, we will only do so with your explicit consent.

Source of the personal data:

11th Hour Events Ltd sources your personal / special data from:

- You directly, by means of your CV or other forms that you have provided to us
- From job boards or other professional job search networking sites, such as LinkedIn that you have signed up
- From an agent/third party acting on your behalf
- A client who you are working/have worked for or where you are known to our client
- A referee whose details you have provided to us
- A friend, colleague, or employer
- Our website
- Appropriate authorities to verify details you have provided, check qualifications, rights to work, and to check your suitability for the roles you have applied for (this includes work references and DBS checks)
- HMRC or other government bodies

3. Overseas Transfers

11th Hour Events Ltd does not transfer the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

In some cases, personal data may be saved on storage solutions that have servers outside the EEA (for example, Dropbox, Google) however only those storage solutions that provide secure services with adequate relevant safeguards will be used.

In the event we do need to transfer your data outside the EU/EEA we will only do so when we are adequately satisfied that the level of data protection, as required by that Country's laws, is at least to that which we adopt.

4. Data Retention

11th Hour Events Ltd will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time.

If we have not had any meaningful contact (involving two-way communication, either verbal or written, with you) for a period of six years we will delete your personal data from our recruitment database and associated systems in the subsequent January or July (as such your records may remain on our database for a total of 78 months). The exception to this is where we believe in good faith that the law or other regulation requires us to preserve it (or specific personal data) for longer (e.g., some work-related medical examination data will be retained for 40 years (statutory requirement) following the end of the work assignment period and associated data subject information will be retained alongside this.

Any personal data relating to individuals we deal with in our clients or suppliers organisations are retained for a period of 4 years from the date following any meaningful contact with that client or supplier. After that we will delete this information in the following January or July whichever comes first.

Despite our best endeavours some of your data may still exist within our system (e.g., backups), however, we have structured our systems so that your data is not readily accessible by any of our operational systems, processes or staff beyond our stated Data Retention periods.

5. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data 11th Hour Events Ltd processes on you
Achieved by means of this GDPR Privacy Statement
- The right of access to the personal data 11th Hour Events Ltd processes on you
If you make a Data Subject Access Request under your access rights, you should note that we may ask you for more information to verify your identity and provide greater detail about your request before we comply. If we are legally permitted to do so we may decline your request, in which case we will explain to you why
- The right to rectification of your personal data
You can ask us to rectify any inaccurate information we hold. Where you are engaged on a temporary work assignment or are engaging via us with one of our clients about a permanent vacancy, we will notify the client about the rectification. Where appropriate we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to, so you can take action to inform them of any rectification you require
- The right to erasure of your personal data in certain circumstances
Where we agree with the request we will delete your data securely but will generally assume that you would prefer us to keep a note of your name and date of birth on our register of individuals that would prefer not to be contacted (this is aimed at minimising the chances of you being contacted in the future where your data is collected in some other unconnected circumstances). If you disagree with us holding your name for this purpose you are free to write to us at the address shown at the top of this GDPR Privacy Statement and say so
- The right to restrict processing of your personal data
Your rights apply in the event you dispute the accuracy of the personal data or you object to our processing of your personal data on the grounds of our legitimate interests or if you consider our processing of your data unlawful
- The right to data portability in certain circumstances, this being in the event that your personal data:
 - o Has been provided to us by you, and,
 - o Has been processed automatically, and,
 - o Has been processed by us based on your consent or in order to fulfil the requirements of a contract;
- The right to object to the processing of your personal data that was based on a public or legitimate interest
Generally, we will only disagree with you if certain limited conditions apply, being that we can show compelling grounds for processing that overrides your interests, or we are processing your data for the establishment, exercise or in defence of a legal claim.
- The right to withdraw consent at any time where we have relied on consent as a legal basis for processing your data
Where you have consented to 11th Hour Events Ltd processing your personal data/special data you have the right to withdraw that consent at any time by contacting the person stated at the top of this GDPR Privacy Statement. Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where 11th Hour Events Ltd will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.

If you believe that any of your data that 11th Hour Events Ltd processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary. You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

We will seek to deal with your request as quickly as we can and within 30 days (unless we have reason and are allowed to extend this period).

6. Sale of business

If 11th Hour Events Ltd's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business. We will ensure that all such parties are GDPR compliant prior to such disclosure.

7. Data Security

We are passionate about protecting your information, so we have put in place appropriate measures that are designed to prevent unauthorised access to and/or misuse and/or loss of your personal data.

We have done this by putting in place sound technical and organisational measures which include a process on how we deal with any suspected breach, ensuring firewalls, anti-virus, encryption and limited access by means of secure passwords apply to our systems. We also endeavour to use secure electronic methods of transferring documents between us, for example the forms that we use to collect and store your personal data.

Only employees who need the information to perform a specific job (for example, consultants, our accounts and payroll team or our marketing personnel) are granted access to some/all of your information, as appropriate.

11th Hour Events Ltd uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/the Internet is not entirely secure and for this reason 11th Hour Events Ltd cannot guarantee the security or integrity of any personal information which is transferred from you or to you via such media.

If you share a device with others, we recommend that you do not select the "remember my details" function when that option is offered.

If you have any questions about the security measures on our website, you can email the person stated at the top of this GDPR Privacy Statement.

8. Changes to this privacy statement

We will update this GDPR Privacy Statement from time to time. We will post any changes to the statement with revision dates on our website(s). If we make any material changes, we will notify you.

9. Complaints or queries

If you wish to complain about this GDPR Privacy Statement or any of the procedures set out in it, please contact us using the contact details above.

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.