

## **Recruitment Privacy Policy**

Barracudas acts as a Data Controller for the purposes of [GDPR](#). To process your application/enquiry we need to collect personal details about you. We will respect and protect your privacy at all times. This policy sets out how we will collect, use and store any personal data about you.

By completing an application with us (either in part or full), you are agreeing to us storing and processing information about you as set out below. You are responsible for ensuring you have the agreement from all persons detailed on your application to pass on their details to us.

### **What is our legal basis for processing data?**

Our lawful bases for processing data are as follows;

**Consent** – consent has been obtained to use personal data

**Contract** – the processing of data is necessary to fulfil our safer recruitment procedures

**Legitimate Interest** – we use your data to pursue our legitimate interests in such ways which would be reasonably expected in order to operate our business and which does not impact on your freedom or rights

### **When do we collect data?**

When you register your details with us we will need to collect certain personal details in order to process your application.

Prior to working at camp we will also need to collect more sensitive personal data to comply with our safer recruitment procedures, for example suitability background checks, passport information, payroll information and medical conditions.

During camp you may need to complete forms which will require personal information, for example an accident form. This information is retained and archived by the company.

We may also collect data from you in other ways that will request your name, address, email address and telephone number. For example when you enter a competition, complete a survey or follow/interact with us through social media.

## **What data do we collect?**

**General** - Name, addresses, DOB, email addresses, telephone numbers, medical information, next of kin, qualifications, employment history, references, evaluations, t-shirt size, details of your interactions with us e.g. a query on your application, details of your visits to our website (see Cookies), personal details to help tailor our opportunities to you, social media username if you make contact with us in this way and an encrypted log in password.

**Payroll** - Bank details and National Insurance number to be able to make payment for the work carried out.

**Identification** - Passport details to confirm eligibility to work in the UK, DBS certificate information to confirm suitability to work with children.

The law requires us to take reasonable steps to ensure data is kept accurate and up to date. We remind staff to update details when logging into their profile and we will also confirm staff details during telephone conversations.

## **Cookies**

Our website uses cookies. Some cookies are essential and are there to enable you to make your application, others are non-essential and are used to track visitor behaviour on the site, determine relevant information to show you for re-marketing purposes or to track where visitors to the website have come from. Cookies are not harmful and do not contain any personal information e.g. address or DOB.

You can choose to accept or decline cookies when you first visit the site by accessing the preference panel from your browser's main menu (usually found under Edit, Tools or Options). If you choose to remove cookies, some of our site may not function properly for you and your use of the site may be impaired.

We may collect details about your device and visits to this site including IP address, browser type, device type, traffic data and location information. This is statistical information to help us provide the best online experience for our staff and does not identify any individual.

Sometimes we use content from other websites including Google maps, Google Adwords, Youtube, Facebook, Instagram, LinkedIn and Twitter. These sites also use cookies, so by accessing this content

you may also be sent cookies from these sites. You can check these individual websites for further information on the cookies they use.

If you would like to opt out of targeted online advertising you can do this by visiting <http://www.youronlinechoices.com/uk/> . This site lists many networks not just those associated with Barracudas and opting out will only apply to the web browser on the device you are using at the time. If you choose to turn off online behavioural advertising you will still see advertising on the internet, however, it will not be tailored to your likely interests or preferences.

### **How do we use your data?**

If you have started or completed an application with us we may use your data to contact you via post, email, phone or text message with information about employment opportunities or to administer prize draws/competitions you may have entered or to send surveys or feedback requests.

We will only do this if you have opted in to receive such information from us and you have the right to opt out of your data being used for these purposes at any time. Please let us know if your details or preferences change so we can keep our records up to date.

If you have a contract with us, in addition to the above, we will also use your data to contact you with information relating to your work and in ways to comply with our legal obligations when operating the children's camps.

**Opting In/Out** - Your privacy is important to us which is why we like to make sure you're in control. You can opt in or out at any time by ticking/unticking certain boxes that relate to your personal information and its use. You can do this yourself by logging into your account or contacting us at [jobs@barracudas.co.uk](mailto:jobs@barracudas.co.uk) or on 01480 497533. You can also click 'unsubscribe' at the bottom of any emails from us and can text 'STOP' to any SMS messages. We will then update your account accordingly.

**Third Parties** - We will not pass on your personal information to other users of the site and we will only ever pass on your personal details to a third party if it is necessary to fulfil a particular service on your behalf or as part of our normal business activities. For example, your bank details will need to be passed on to 'Contractor Solutions' in order to process your wages. Any details passed on will be transferred in a secure manner.

At times, third parties 'manage' our data, for such services as de-duping, mailing, e-marketing campaigns, data analysis and profiling. Information is given securely and only to approved suppliers.

Should any safeguarding concerns or legal proceedings require us to pass on your personal information we trust you will understand that we have a duty to comply with the law. Please be aware that the way in which your personal details would be legally protected within the UK may differ from other countries.

Our website contains links to and from other websites including schools and advertisers. If you follow a link from our site to another site, please be aware that the third party site will have its own privacy and data protection policies and we are not responsible for how they may collect their data.

### **How do we protect data?**

**Storage** - Once data is received, we will take all reasonable steps to ensure your data is secure to prevent unauthorised access to it. All information you provide is stored on secure servers, our IT systems are password protected, hard copy information at camp is held in lockable containers.

**Transfer** - Barracudas uses WeTransfer when sending confidential and sensitive information by email to staff or external suppliers/authorities. This is a cloud based computer file service which encrypts the files and therefore cannot be intercepted.

**Security and passwords** - When you start or complete an application with us you will be required to enter an email and password so that you can access your details online. We advise your password should consist of at least six characters that are a combination of letters, numbers and symbols (e.g. @, #, \$, %). It should also contain letters in both uppercase and lowercase.

Please do not share your password with anyone. Unfortunately, the passing of data via the internet is not completely secure therefore any transmission is at your own risk. Please keep these details safe and not written down anywhere. If you change your personal details or if you suspect that someone else has used your password, then please notify us as soon as possible.

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

There are legal requirements for how long we have to keep data for before destroying it. Due to the nature of our services involving children we are required to keep information relating to each child until they reach the age of 21 years. We therefore will need to also keep all staff information for 17 years. Once this time period has passed, we securely delete and destroy all of the information we

hold relating to that specific year. Hard copies of personal data are shredded and any electronic copies are securely deleted.

Whilst we hold data for longer, we will however only use your personal data to contact you regarding work opportunities within a maximum of 3 years of your last contract.

### **Your rights**

You have the following rights in relation to your data:-

Right to access, rectification, erasure, data portability, objection and automated decision making (including data profiling). If you would like to exercise any of these rights please write to Barracudas, Unit 9, Airfield Industrial Estate, Warboys, Huntingdon, Cambridgeshire, PE28 2SH or by email to [info@barracudas.co.uk](mailto:info@barracudas.co.uk) or you can call us on 01480 467567. Please note that in some circumstances we will still need to retain certain data in order to comply with our legal obligations.

If a subject access request is put forward, we will send the information within one month and free of charge – this will be sent in a protected file. Please note that we will ask some security questions to prove your identity before disclosing any data.

If you are not happy with the way we have handled your data, or responded to your requests you can lodge a complaint with the Information Commissioner's Office at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or by phone on **0303 123 1113**.

### **Changes to our policy**

We reserve the right to update this policy from time to time and we will keep you informed by updating this statement on our website.