

Privacy notice

This Policy is issued by HORA HR and Recruitment Ltd. and is addressed to individuals outside our organisation with whom we interact, including visitors to our websites (our “Sites”), customers, partners, personnel of partners and customers, vendors, and other recipients of our services. HORA HR and Recruitment Ltd. is aware of its obligations under the Data Protection Act 2018 and General Data Protection Regulation (GDPR) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, the types of data that we may hold on you. It also sets out how we collect the data, use that information, how long we keep it for, and other relevant information about your data.

Processing your Personal Data

Collection of Personal Data: We collect Personal Data about you, subject to applicable law, from a variety of sources as follows:

- We obtain your Personal Data when you provide it to us (e.g., where you contact us via email or telephone, or by any other means).
- We collect your Personal Data in the ordinary course of our relationship with you.
- We collect Personal Data that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible).
- We receive your Personal Data from third parties who provide it to us in line with current legislation.
- We collect or obtain Personal Data when you visit any of our Sites or use any features or resources available on or through a Site. When you visit a Site, your device and browser may automatically disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a Site and other technical communications information), some of which may constitute Personal Data.

Data Security

We have implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

You are responsible for ensuring that any Personal Data that you send to us are sent securely.

Data Accuracy

We take reasonable steps designed to ensure that:

- your Personal Data that we Process are accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

Data Minimisation

We take reasonable steps designed to ensure that your Personal Data that we Process are limited to the Personal Data reasonably required in connection with the purposes set out in this Privacy notice.

Data Retention

We take every reasonable step to ensure that your Personal Data are only Processed for the minimum period necessary for the purposes set out in this Notice. The criteria for determining the duration for which we will retain your Personal Data are as follows:

(1) we will retain copies of your Personal Data in a form that permits identification only for as long as:

a. we maintain an ongoing relationship with you (e.g., where you are a recipient of our services, or you are lawfully included in our mailing list and have not unsubscribed); or

b. your Personal Data are necessary in connection with the lawful purposes set out in this Notice, for which we have a valid legal basis,

plus:

(2) the duration of:

a. any applicable limitation period under applicable law (i.e., any period during which any person could bring a legal claim against us in connection with your Personal Data, or to which your Personal Data may be relevant); and

b. an additional two (2) month period following the end of such applicable limitation period (so that, if a person bring a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that are relevant to that claim),

and:

(3) in addition, if any relevant legal claims are brought, we may continue to Process your Personal Data for such additional periods as are necessary in connection with that claim.

During the periods noted in paragraphs (2)a and (2)b above, we will restrict our Processing of your Personal Data to storage of, and maintaining the security of, those data, except to the extent that those data need to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, we will either:

- permanently delete or destroy the relevant Personal Data;
- archive your Personal Data so that it is beyond use; or
- anonymize the relevant Personal Data.

Your legal rights

Under the Data Protection legislation, data subjects have the following rights with regards to their personal information:

- the right to be informed about the collection and the use of their personal data;
- the right to access personal data and supplementary information;
- the right to have inaccurate personal data rectified, or completed if it is incomplete;
- the right to erasure (to be forgotten) in certain circumstances;
- the right to restrict processing in certain circumstances;
- the right to data portability, which allows the data subject to obtain and reuse their personal data for their own purposes across different services;
- the right to object to processing in certain circumstances;
- rights in relation to automated decision making and profiling;
- the right to withdraw consent at any time (where relevant);
- the right to complain to the Information Commissioner.

Direct Marketing

We may Process your Personal Data to contact you, primarily by mail and email and also on occasion by telephone, so that we can provide you with information concerning services that may be of interest, in accordance with applicable law.

If you do not wish to receive marketing communications from us you can opt out at any time by contacting Luke Rodgers at luke@thecareleaders.com. After opting out, we will not send you further promotional emails, but we may continue to contact you to the extent necessary for the purposes of any Services you have requested.

Contact details

If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Data by HORA HR and Recruitment Ltd., please contact Luke Rodgers at luke@thecareleaders.com.

Defined terms

Controller	The entity that decides how and why Personal Data is Processed in line with applicable data protection legislation.
Data Protection Authority	An independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
Personal Data	Information that is about any individual, or from which any individual is identifiable.

Process or Processed or Processing	Anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Personnel	Any current, former and prospective directors, officers, consultants, employees, temporary staff, individual contractors, interns, secondees and other personnel.
Processor	Any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
Sensitive Personal Data	Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, or any other information that may be deemed to be sensitive under applicable law.
Criminal Offences Data	Personal data about any actual or alleged criminal offences or penalties.

Purposes for which we may Process your Personal Data, and legal bases for Processing:

The purposes for which we may Process Personal Data, subject to applicable law, and the legal bases on which we may perform such Processing, are:

Provision of services to you:
 administering relationships and related services; performance of tasks necessary for the provision of the requested services; communicating with you in relation to those services.

- The Processing is necessary in connection with any contract that you may enter into with us, or to take steps prior to entering into a contract with us; or
- We have a legitimate interest in carrying out the Processing for the purpose of providing services to you (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Marketing / Prospecting:
 communicating with you via any means (including via email, telephone, text message, social

- We have a legitimate interest in carrying out the Processing for the purpose of conducting marketing and prospecting (to the extent that such legitimate interest is

media, post or in person) subject to ensuring that such communications are provided to you in compliance with applicable law; and maintaining and updating your contact information where appropriate.

- not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Health and safety: health and safety assessments and record keeping; and compliance with related legal obligations.

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of providing a safe and secure environment at our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- The Processing is necessary to protect the vital interests of any individual.

Legal compliance: compliance with our legal and regulatory obligations under applicable law.

- The Processing is necessary for compliance with a legal obligation.

Client on-boarding: on-boarding new clients; and compliance with our internal compliance requirements, policies and procedures.

- The Processing is necessary in connection with any contract that you may enter into with us, or to take steps prior to entering into a contract with us; or
- We have a legitimate interest in carrying out the Processing for the purpose of on-boarding new clients (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Legal proceedings: establishing, exercising and defending legal rights.

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of establishing, exercising or defending our legal rights (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Improving our services: identifying issues with existing services; planning improvements to existing services; and creating new products and services.

- We have a legitimate interest in carrying out the Processing for the purpose of improving our services (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).