

Privacy Notice General

V1.1 August 2024

Our purpose

To create a **healthier, safer,** and more **beautiful** world

Our mission

To be the market leader and trusted partner for clients.

Our values

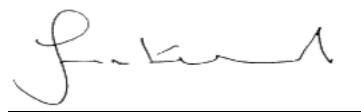
 <p>PASSION We love and enjoy the work that we do</p>	 <p>RESPECT For each other and the environment</p>	 <p>INTEGRITY We take responsibility and our word is our bond</p>	 <p>DIVERSITY Creating a culture of equality and inclusivity</p>	 <p>EXPERTISE Adding value using our skills, knowledge & experience</p>
---	--	--	--	---

Associated Group Policies:	Privacy Notice Employees	IMS Reference:	
Department:	HR/IT	Review date:	August 2024
		Next review date	August 2025

Revision	Date	Revision Description	Requested by
V1.0	February 2023	Document approved and issued	Eoin O'Connell - CIO
V1.1	August 2024	Annual Review, included personal data collected during acquisitions under 3.5.2, changed DPO contact email under clauses 9& 10,	Yogesh Agarwal - DPO

	Author:	Owner:	Approver:
Name:	RightCue	Nurture Group	Gareth Kirkwood
Job Title:	Ex Consultants	DPO	CEO

CEO Signature:



This document is uncontrolled if printed or copied from the network



Table of Contents

Table of Contents	3
1 Introduction	4
2 Data Protection Officer.....	4
3 How we collect and use (process) personal information	4
3.1 Recruitment Data	4
3.1.1 Application Stage	4
3.1.2 Selection Stage	5
3.1.3 How long is the information retained?	5
3.2 Clients and Business Contacts.....	5
3.3 Visitors to our Website and Social Media platforms	6
3.3.1 Website	6
3.3.2 Social Media Platforms	6
3.4 Visitors to our Website and Social Media platforms	6
3.5 Marketing Data.....	6
3.5.1 How is your personal data collected	6
3.5.2 What personal information do we receive from other sources?.....	7
4 How do we use your personal data	7
4.1.1 Where you have provided consent	7
4.1.2 Where it is in your vital interests	7
4.1.3 Where there is legitimate interest	7
4.1.4 Where there is a legal requirement.....	7
4.1.5 Where it is required to complete a contract	8
5 When and how do we share your personal data	8
5.1.1 What personal information do we receive from other sources.....	8
6 Transfers of personal data outside the EEA.....	8
7 Automated decision making.....	8
8 Security of your personal information	9
9 Data Storage and Retention	9
10 Data Subject Rights	9
10.1.1 Withdrawing your consent	10
10.1.2 Making a compliant	10

This document is uncontrolled if printed or copied from the network



1 Introduction

This Privacy Notice (“Notice”) – together with any other privacy information we may provide on specific occasions – applies to the processing of personal data by us in the course of providing our services and carrying out our business operations. The Notice sets out the types of personal data we collect, explains how we collect and process that data, who we share it with and certain rights and options that you have in this respect.

We recognise that information privacy is an ongoing responsibility, and so we will from time to time update this Privacy Notice as we undertake new personal data practices or adopt new privacy policies.

2 Data Protection Officer

When we refer to “The Nurture Group” or “we” in this Notice we mean Nurture Landscapes Limited and all its subsidiaries and affiliated companies. Nurture Landscapes Limited is a company incorporated in England & Wales with registered number 03523868 and registered address at Nursery Court, London Road, Windlesham, Surrey, GU20 6LQ. We are registered with the Information Commissioner's Office under registration number Z1662106.

3 How we collect and use (process) personal information

The data we collect and process:

- Recruitment data
- Clients and business contacts
- Visitors to our websites
- Marketing data

3.1 Recruitment Data

All information you provide during the application process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the United Kingdom or the European Union. The information you provide will be held securely by us whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

3.1.1 Application Stage

At the application stage, we ask you for

- Contact details-name, former surnames, address, phone number and email address
- Your previous experience- details of your education, professional qualifications, work history, work related training, references from previous employers
- Current salary/salary expectation and preferred work arrangement
- Ability to drive in the UK if relevant for the role

This document is uncontrolled if printed or copied from the network



- Nationality
- Outside work interests
- Voluntary disclosure of disability
- Unspent convictions under the Rehabilitation of Offenders Act

You may also be asked to provide equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment and HR team in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics

3.1.2 Selection Stage

Our hiring managers shortlist applications for interview. They will not be provided with your equal opportunities information if you have provided it.

We will also ask you to provide contact details of two references, their details and their answers and/ or opinions will be retained by us. We will also conduct an ID verification and check your right to work in the UK before any offer letters are issued.

3.1.3 How long is the information retained?

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the campaign. Information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the campaign.

If you provide us with your CV for example by uploading it to our website, we will only retain it beyond 6 months from the end of the campaign if we have your written consent to do so.

If you are successful in your application, we will retain your information in accordance with our Privacy Notice for Employees, Workers and Contractors. A copy of this Notice will be provided to you with your offer letter.

3.2 Clients and Business Contacts

We collect personal information about our clients and other business contacts to provide them or their clients with our services. We hold the following information about clients:

- Contact details- name, business address, business email address, business phone numbers including mobile numbers
- In small number of private customers, their home address will be retained as part of service delivery agreements.
- Personal information contained in business communications.
- Transaction data including details about services you have engaged us for or enquired about.

We may receive personal information from our clients about other individuals, e.g., their employees, or employees of their end clients, while providing our services. Any such information provided to us is used solely for providing our services and is handled strictly as per client instructions.

This document is uncontrolled if printed or copied from the network



3.3 Visitors to our Website and Social Media platforms

3.3.1 Website

Like many other websites, our websites <https://www.nurture-group.co.uk/> use cookies (including Google Analytics cookies to obtain an overall view of visitor habits and visitor volumes to our website). 'Cookies' are small pieces of information sent to your computer or device and stored on its hard drive to allow our websites to recognise you when you visit. The information is only processed in a way which does not identify any individual.

Details about the cookies used by us is displayed when you visit our website for the first time at a banner display at the bottom of your browser. From here you can either accept all cookies, reject or view more details by clicking on settings. It is possible to switch off cookies using our cookies banner or by setting your browser preferences, if you have accepted once.

When you email us using the links on our website, we will use the information provided by you only for the purpose of providing you with an appropriate response.

3.3.2 Social Media Platforms

We may also collect any personal information which you allow to be shared that is part of your public profile or third party social network, including type and version, time zone setting, browser plug-in types and versions, operating system and platform.

3.4 Visitors to our Website and Social Media platforms

We will retain information about your visit, for example, time of visit and exit, purpose of visit, your employer. Where the office is under CCTV surveillance, we may record CCTV images for internal security purposes.

3.5 Marketing Data

We hold name and contact details of individuals who have expressed interest in hearing from us about our services or have engaged with us for supply of our services in the past. All direct marketing activities to such individuals shall comply with relevant privacy and regulatory requirements.

3.5.1 How is your personal data collected

You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- engage us to provide services
- subscribe to our publications
- request marketing material to be sent to you
- contact us via our social media sites (e.g., LinkedIn)
- complete any surveys commissioned by us
- complete one of our enquiry forms or
- provide us with feedback

This document is uncontrolled if printed or copied from the network



3.5.2 What personal information do we receive from other sources?

Apart from receiving personal data directly from you when you engage us to provide services, we may receive personal data from our partners or from the acquired companies and other third-parties, for example the main contractor dealing with you. The personal information we receive from third party sources is limited to your contact information.

4 How do we use your personal data

The purposes for which we use your information and the legal basis under data protection laws on which we rely to do this are explained below.

4.1.1 Where you have provided consent

Your data will only be used for the purposes you have provided consent. We will always request your explicit consent before using any sensitive information about you such as your health data.

You may withdraw your consent for us to use your information in any of these ways at any time. Please see **Section 10: Data Subject Rights** for further details.

4.1.2 Where it is in your vital interests

We may use your personal information to contact you if there are any urgent safety notices to communicate to you or where we otherwise reasonably believe that the processing of your personal information will prevent or reduce any potential harm to you. It is in your **vital interests** for us to use your personal information in this way.

4.1.3 Where there is legitimate interest

We may use and process your personal information where it is necessary for us to pursue our **legitimate interests** as a business, or that of a third party, for the following purposes:

- for marketing activities (other than where we rely on your consent to contact you by email or text with information about our products and services)
- for analysis to inform our marketing strategy, and to enhance and personalise your customer experience (including to improve the recommendations we make to you on our website)
- to correspond or communicate with you
- for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access
- for prevention of fraud and other criminal activities
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request)
- for the management of queries, complaints, or claims and
- for the establishment and defence of our legal rights.

4.1.4 Where there is a legal requirement

We will use your personal information to comply with our legal obligations:

- to assist any regulator or other public authority or criminal investigation body
- to identify you when you contact us
- to verify the accuracy of data we hold about you

This document is uncontrolled if printed or copied from the network



4.1.5 Where it is required to complete a contract

We may use and process your personal information where we have supplied you (or continue to supply you) with any services, where we have arranged for the supply of another company's services to you, or where you are in discussions with us about any new service. We will use this information in connection with the contract for the supply of services when it is needed to carry out that contract with you or for you to enter into it.

5 When and how do we share your personal data

We may share your personal data with:

- internally with staff members who require your information to provide our services and who have received training in data protection
- with our professional advisors, including our legal advisors, financial advisors, insurers, accountants, auditors or other consultants to the extent they require this information to provide their services to us
- with sub-contractors who are asked by us to deliver all or some of the services and who are contracted to comply with data protection regulations
- with courts, law enforcement authorities, regulators or government officials where it is legally required
- with third parties providing IT support and maintenance services, marketing and client support services, data storage services; checks for credit risk reduction and other fraud and crime prevention purposes; other financial institutions and credit reference agencies providing services to us
- as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation
- any third parties with whom you require or permit us to correspond.

We do not sell personal information to anyone and only share it with third parties who are facilitating the delivery of our services and communications.

5.1.1 What personal information do we receive from other sources

Apart from receiving personal data directly from you when you engage us to provide services, we may receive personal data from our partners or from the acquired companies and other third-parties, for example the main contractor dealing with you. The personal information we receive from third party sources is limited to your contact information.

6 Transfers of personal data outside the EEA

There may be occasions where we will need to share your data with entities in third countries, such as when we are using cloud software providers or outsourced contractors which enable us to provide you with the services. We verify that any data transfer outside of the UK or EEA is subject to UK or EU adequacy requirements, Standard Contractual Clauses or other transfer tools which comply with data protection legislation.

7 Automated decision making

We do not use automated decision-making in relation to your personal data.

This document is uncontrolled if printed or copied from the network



8 Security of your personal information

To help protect the privacy of data and personally identifiable information you provide to us, we maintain physical, technical and administrative safeguards. We update and test our security technology and controls on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide benefits or services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

We are certified to Cyber Essentials, Cyber Essentials plus and IASME Cyber Assurance standards which demonstrates our commitment to security and privacy of your personal information.

9 Data Storage and Retention

Your personal data is stored by the Nurture Group on its servers, and on the servers of the cloud-based services and IT service providers we engage, as well as in physical forms in our office and at backup and archival facilities. We retain data as per our data retention policy and regulatory data retention requirements.

The length of time we retain your personal data is determined by a number of factors including the purpose for which we use that information and our obligations under other laws. We do not retain personal information in an identifiable format for longer than is necessary.

For more information on where and how long your personal data is stored, and for more information on your rights of erasure and portability, please contact us at dpo.nurturegroup@rightcue.com

10 Data Subject Rights

This Privacy Notice is intended to provide you with information about what personal data the Nurture Group collects about you and how it is used. If you have any questions, please contact us at dpo.nurturegroup@rightcue.com

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one month from either (i) the date that we have confirmed your identity or receive further details we may request from you or (ii) where we do not need to do this because we already have this information, from the date we received your request.

Your rights include:

- Accessing your personal information
- Correcting and updating your personal information
- Objecting to our use of your personal information and automated decisions made about you
- Erasing your personal information or restricting its processing

This document is uncontrolled if printed or copied from the network



We are obliged to honour such requests as per the regulatory requirements. Where you have requested us to stop processing your data, we may continue to process your data if we are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings. If you'd like more information or would like to make such a request or are unhappy about how we process your personal information please contact us at dpo.nurturegroup@rightcue.com

10.1.1 Withdrawing your consent

Where we rely on your consent as the legal basis for processing your personal information, as set out under **How we use your personal information**, you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can do so using our unsubscribe tool. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

10.1.2 Making a compliant

If you think your data rights have been breached, and if we have failed to address your concerns to your satisfaction, you are able to raise a complaint with the Information Commissioner (ICO). Before contacting the ICO directly, please contact us to give us a chance to address your queries.

If you are still unsatisfied, you can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 or 01625 545 745.

This document is uncontrolled if printed or copied from the network

