



## PRIVACY NOTICE

PeoplesFuture Ltd (“we” or “us”) trading as thefutureworks, wholly owned subsidiary of Coventry University Enterprises Ltd respects your privacy and is committed to protecting your personal data. This privacy notice tells you what to expect when we collect and/or process your personal data when you use our website, and/or when you use our services (whether as a candidate or an employer).

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This privacy notice supplements the other notices and is not intended to override them.

For the purposes of UK laws relating to data protection and privacy, PeoplesFuture Limited is the data controller and is responsible for your personal data and we are registered as a data controller with the Information Commissioners’ Office (registration number ZA333567).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions, including any requests to exercise your legal rights, please contact the DPO using the details set out at the bottom of this privacy notice.

### The Types of Information We Collect About You

Personal data means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, passport number, identity card, birth certificate, visa details, national insurance, DBS number (if applicable), university ID number where applicable.
- **Contact Data** includes address (home, postal or other physical address), email address and telephone numbers.
- **Application Data** includes your Identity and Contact Data together with your academic and employment history and any other information (including any Special Categories of Personal Data (as referred to below) that you include in your CV or application including professional certificates
- **Financial Data** includes bank account and national insurance details.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Personal data does not include data where your identity has been removed or which is not associated with or linked to your personal data (anonymous data).

We may collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), and information about criminal convictions and offences where it is included in your CV or application or where we have a legal basis for collecting and processing such data as set out below (How We Collect and Use Your Personal Data).

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.



Please note that where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with the services that you request). In this case, we may have to cancel a service you have requested but we will notify you if this is the case at the time.

## How We Collect and Use Your Personal Data

We will collect personal data directly from you (e.g. where you provide us with your CV or application, use our services, request information from us, participate in a survey, or otherwise contact us). We may also collect personal data from third parties, such as where an employer provides us with information following an interview, where an offer of employment has been made, or where we request a reference.

There are various reasons that we need to collect and process your personal data. We may collect and process the personal data about you for the following purposes:

- **Provision of Services**
  - **Candidates** – we will use your Application Data for the purpose of providing our employment agency and employment business services to you for the means of identifying suitable employment opportunities, contacting you to discuss vacancies, arranging registration interviews with you, and submitting your CV to potential employers. We will use your Financial Data supplied at the point of registration in order to pay your wages where they are paid through PeoplesFuture Ltd t/a thefutureworks as a temporary worker. We will process the personal data referred to in this paragraph in accordance with any contract that you enter into with us or for our legitimate interests in operating our business as a recruitment agency and recruitment business. Where your application contains Special Categories of Personal Data, we will process such data in accordance with our rights in the field of employment law (to the extent permitted by law) or otherwise where we have your express consent to do so.
  - **Employers** – we will use your Identity and Contact Data for the purpose of providing you with services as an employment agency and employment business, in accordance with any contract entered into for the provision of such services.
- **Contact us** – If you make an enquiry or provide us with feedback, in order to reply to your message we will respond to you using the Identity and Contact Data that you provide to us. This information will be used to answer your enquiry as completely and thoroughly as possible and will not be used for any other purpose unless you have requested additional services from us such as to receive our newsletter.
- **Surveys** – If you choose to complete a survey that we use for research purposes we will retain the information that you provide in response to that survey. Where your survey response includes Identity or Contact Data, this will be processed in accordance with our legitimate interest in analysing the needs and interests of our current and prospective candidate and employer base, and in furthering and improving our business.
- **Advertising, marketing and public relations** – we may use your Identity, Contact, Technical and/or Usage Data to form a view on what we think you may want or need, or what may be of interest to you and in doing so we will only send you information that is deemed relevant to you.
- **Website administration** - As you navigate our website, Technical and Usage Data may be collected automatically. We do this to find out things such as the number of visitors to the various parts of the website, and to help us to improve the content of the website and to customise the content or layout of the website for you, in accordance with our legitimate interests. We collect this information in a way which does not identify you and we do not make any attempt to find out the identities of those visiting our website.
- **Fault reporting** - If you contact us to report a fault with our website, we will use the information provided for the purposes of rectifying that fault in accordance with our legitimate interests.
- **Recruitment** - Personal data including Identity and Contact Data provided for an employment opportunity with us will be processed so as to allow us to process and evaluate the merits of that application in accordance with our legitimate interests.

We may also use personal data which you provide to us, where the law allows us to do so:

- To deal with and/or respond to any enquiry or request made by you prior to entering into any contract or agreement with us or as a result of such contract or agreement;
- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where we need to comply with a legal or regulatory obligation, including the prevention of crime;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Generally, unless otherwise stated, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by updating your account preferences or by contacting us.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

### Cookies

A cookie is an element of data that a website sends to your computer's hard drive while you are viewing a website. This website uses session cookies (which expire once you close your web browser). You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it. You can also set your browser to turn off cookies. If you do so, however, some areas of the website may not function properly.

Cookie used	Reason for use
PHPSESSID	Website session
__utma	Google Analytics
__utmb	Google Analytics
__utmc	Google Analytics
__utmz	Google Analytics
WordPress	WordPress
WP-Settings	WordPress

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

### Disclosure of Personal Data to Third Parties

Your personal data will only be disclosed to such of our employees as we have a need for such access for the purpose for which it was collected and will not be sold, traded, or rented to individuals or other entities. However, we may need to share your personal data with third parties in the following circumstances:

- where you are a candidate: to employers, where we are putting you forward for an employment opportunity;



- where you are an employer: to candidates, where we have put them forward for an employment opportunity and need to provide contact details in connection with interviews;
- on occasion, we need to hire other companies to help us to serve you better and in some of these cases we may need to share personal data that is necessary to perform tasks for us, such as market research or issuing marketing materials;
- it is necessary for the performance of our contract with you, including where we need to take steps to enforce any agreements which may be entered into between us;
- we are under a legal duty to do so in order to comply with any legal obligation;
- to protect the rights, property or safety of our business, our staff and others.

We will get your express consent before we share your personal data with any third party for marketing purposes, or before we send you marketing information on behalf of any third party.

We require all third parties that process personal data on our behalf to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **International Transfers**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of our contracts and/or agreements with you, the processing of any payments and the provision of support services. By submitting your personal data, you agree to this transfer, storage and processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy and that it is subject to appropriate safeguards.

### **Security of Your Personal Data**

The security of your personal data is of the utmost importance to us. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed including the use of a firewall and appropriate security measures in our physical facilities. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know as set out above (“Disclosure of Personal Data to Third Parties”). They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We urge you to take every precaution to protect your personal data when you are on the internet.

### **Data Retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available by contacting [enquiries@thefutureworks.co.uk](mailto:enquiries@thefutureworks.co.uk).

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.



## Other Websites and Links

Our website may contain links to other websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control third party websites and are not responsible for their privacy statements or for the content, accuracy or opinions expressed in such websites.

Third party websites are not investigated, monitored or checked for accuracy or completeness by us and the inclusion of any linked website on or through this website or the Service does not imply approval or endorsement of the linked website by us.

If you decide to leave this website and access these third party websites, plug-ins and/or applications you do so at your own risk and we encourage you to read the privacy notice of every website you visit.

## Your Legal Rights Including Access to Your Personal Data

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent. You can ask us or third parties to stop sending you marketing messages at any time by logging into your website account and checking or unchecking relevant boxes to adjust your marketing preferences, or by following the "unsubscribe" (or similar) links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase, product/service experience or other transactions.



If you wish to exercise any of your above rights, please send a written request to us at the address listed at the end of this privacy notice addressed for the attention of the DPO.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **About this Notice**

This privacy notice was drafted with clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal data. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

This privacy notice will continue to be reviewed annually.

### **Contact Details**

FAO: DPO  
Information Protection Unit  
Coventry University Group  
1<sup>st</sup> Floor, Portal House  
163 New Union Street  
Coventry  
CV1 2PL

Email: [Enquiry.IPU@coventry.ac.uk](mailto:Enquiry.IPU@coventry.ac.uk)

Telephone: 024 7688 7688

### **Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

**thefutureworks**  
jobs for your future



  
**Coventry**  
University  
Enterprises Limited