

## Mapstone HR Data Privacy Statement

### Introduction

Mapstone HR is a human resources consultancy firm and, as such, routinely processes employee and other related third-party personal data on behalf of clients. Mapstone HR also collects, and processes personal data of individuals employed by, or acting for, the client in order to establish and / or perform a contract with that client.

This policy states how Mapstone HR will process personal data and the relative responsibilities of both Mapstone HR and the client under any agreement.

This policy applies to all services offered by Mapstone HR, except where otherwise noted.

Mapstone HR is exempt from registration with the Information Commissioner's Office (ICO).

### What personal data do we collect and process?

Mapstone HR may collect personal data relating to clients in order to establish, or attempt to establish, a contract with the client. In those circumstances personal data that Mapstone HR is may collect will be limited to personally identifiable information (such as name) and contact information (such as telephone number, address, email).

Once a contract is established, Mapstone HR may process personal data relating to employees and other associated parties of the client, as provided to Mapstone HR by the client in order to fulfil the agreed contract. This data will be collected by and shared with Mapstone HR under the terms of the client's privacy notice and it is the responsibility of the client to ensure that an appropriate privacy notice exists and is clearly communicated to all relevant parties. In those circumstances personal data that Mapstone HR may process may relate to personally identifiable information (such as name, date of birth), contact information (such as telephone number, address, email), and financial information (such as salary and credit referencing information). We may also process special categories of personal data (sensitive data) such as data about health or medical conditions.

At all times Mapstone HR will only collect and process such personal data as is necessary to either establish a contract with a client or perform the duties of the contract with the client.

### How will we use personal data?

Mapstone HR will only process personal data where we have a legal basis to do so.

Personal data concerning clients: In the case of data relating to actual or potential clients we will rely on the legal basis of "legitimate interest" to collect and use personal data. In doing so we will carefully consider and balance any potential impact on those individuals and their rights as a data subject under the relevant data protection regulation.

As an example, we may rely on our legitimate interest to process personal data relating to actual or potential clients for the following purposes:

- To establish a contract;
- To communicate updates about our services, which we think may be of interest to you and are compatible with the original purpose for which we originally gained the information;
- For evidential purposes to effectively manage and maintain records of our relationships/communications with you; and
- For business development related activity such as contacting you by telephone or email to arrange meetings in relation to work or knowledge sharing.

Personal data provided by clients: In most circumstances Mapstone HR will rely on the legal basis of “contractual necessity” to process personal data provided to Mapstone HR by the client.

Occasionally Mapstone HR may also process personal data under the legal basis of “legal obligation” to allow us to comply with a common law or statutory obligation to which we are subject. This includes, but is not limited to, regulation or national law enforcement authorities and HMRC.

Very exceptionally, Mapstone HR may process personal data under the legal basis of “vital interest” to protect someone’s life.

#### Who we share personal data with?

Mapstone HR will never sell or share personal data concerning clients gathered in order to establish, or attempt to establish, a contract with the client.

Personal data that was provided to Mapstone HR by the client for the purposes of performing the contact will only be shared with the client.

Mapstone HR seeks to use the client’s IT infrastructure wherever possible to maintain the highest standards of data security and therefore does not use any in-house databases or systems for the purposes of storing personal data provided by the client for the purposes of performing the contract.

We do not share or process information outside the EU.

#### Retention period

Mapstone HR will only keep personal data for as long as necessary for the purposes for which it was gained and only where we continue to have a legal basis for doing so. We will review the personal data we hold on you in line with our retention policy, to check for accuracy and relevancy and to ensure we continue to have a legal basis for processing. If the personal data is no longer necessary, or where we no longer have the legal basis for processing, we will delete or fully anonymise the data we hold on you, in line with our Data Protection Policy. If your data becomes inaccurate, we will update it accordingly. Otherwise, we will retain your personal data for the following period.

Personal data concerning clients or prospective clients - 7 years.

Personal data provided by clients - 6 months. We will endeavour, wherever practicable, to process personal data provided by clients using the IT infrastructure of the client. This will minimise the personal data footprint of employees and other associated third parties of the client on Mapstone HR IT infrastructure. In any case, all data will be routinely reviewed and deleted or fully anonymised within 6 months of the termination of the client contract.

#### Security and Confidentiality

Mapstone HR is committed to transparency, ensuring that privacy is protected and that personal data is used and retained fairly, transparently and in compliance with the data protection regulation. We will make sure that we have appropriate technical and organisational measures in place to keep personal data secure and to protect against accidental or unlawful destruction, loss, alteration, disclosure or access.

Wherever practicable, it is the strong preference of Mapstone HR to process personal data using the IT infrastructure of the client. This is not limited to the use of client hardware for the purposes processing personal data; use of an email domain owned and controlled by the client for the purposes of transmitting personal data; and access to client company share drives or other document repositories for the purposes of string personal data.

Should the client require Mapstone HR to use their own hardware, email domains and share drives, notwithstanding that Mapstone HR will make every effort to delete information appropriately, the client indemnifies Mapstone HR from any resultant loss.

#### Complaints

Mapstone HR is happy to help should you have any complaints about the processing of personal data concerning clients or prospective clients of Mapstone HR. Please contact [holly@maptsonhr.co.uk](mailto:holly@maptsonhr.co.uk) should you wish to raise any concerns.

Should your complaint relate to personal data shared by the client of Mapstone HR then you are advised to contact the client in the first instance. The client’s privacy policy applies to the collection, processing, accuracy and sharing of the personal data and therefore they may be in a better position to assist.

You have the right to lodge a complaint with the Supervisory Authority, the Information Commissioner Officer (ICO), who are the national authority responsible for the protection of personal data. A complaint can be made to the ICO via their website or through their helpline (0303 123 1113).