

Top Five Percent – Privacy policy

We, **TOPFIVEPERCENT LTD** use your personal data to provide our services to you. We have described how we collect, store and use your data in this Privacy Policy. We take seriously our responsibilities to look after your data and we are committed to protecting your privacy under the latest **General Data Protection Regulation (EU) 2016/679**. There are steps you can take to control what we do with your data and we have explained those steps in this Privacy Policy.

When we talk about data and personal data in this Privacy Policy, we mean personal data which identifies you or which could be used to identify you such as your name, email, address, etc. It may also include information about how you use our website.

Who is responsible for your data?

TOPFIVEPERCENT LTD is responsible for your data. Our registered address is **56 Lemn Street, London, E1 8EU, London, UK**. We are registered as a company in England and Wales under company number **07681663**. We are the data controller and processor of the data which we collect from you, and as such, we control the ways your personal data is collected and the purposes for which your personal data is used.

Our Legitimate Business Interests

Our legitimate interests in collecting and retaining your personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.

In order to support our candidates' career aspirations and our clients' resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements.

To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts.

Personal data we collect about you

1) Information you provide on our website

This is information about you that you give us by filling in forms on our site www.topfivepercent.co.uk (our site) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, to enter our database.

The information you give us or we collect about you may include your name, address, private and corporate e-mail address and phone number, financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

2) Information we obtain from other sources

This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, personal recommendations. In this case we will inform you, by sending you this privacy notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.

Why and how we use your data

We can only use your personal data if we have a proper reason for doing so. According to the law, we can only use your data for one or more of these reasons:

- To fulfil a contract we have with you
- If we have a legal duty to use your data for a particular reason
- When you consent to it
- When it is in our legitimate interests

Reasons we use your personal data for:

- To provide services to you, as requested
- To keep our records up to date
- To communicate with you and manage our relationship with you
- To manage our relationship with you
- To personalise and improve your customer experience
- To fulfil our contracts, provide our services and fulfil our legal duties
- To inform you about our news and offers that we think you might be interested in

We process personal data in order to carry out our obligations arising from any contracts we intend to enter or have entered into between you and us and to provide you with the information, products and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary or permanent engagement.

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail above.

Other uses of your data:

- Use of our website
- To notify you about changes to our service
- To ensure that content from our site is presented in the most effective manner for you and for your computer

We will use this information:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
- To improve our site to ensure that content is presented in the most effective manner for you and for your computer
- To allow you to participate in interactive features of our service, when you choose to do so
- As part of our efforts to keep our site safe and secure
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you

- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them

Retention of your data

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so.

We do the following to try to ensure our data is accurate:

- Our website enables you to manage your data and to review whether the details we hold about you are accurate
- Prior to making an introduction we check that we have accurate information about you

How we protect your data

We protect your personal data against unauthorised access, unlawful use, accidental loss, corruption or destruction.

We use technical measures such as encryption and password protection to protect your data and the systems they are held in. We also use operational measures to protect the data like limiting the number of people who have access to the databases in which our booking information is held, using anti-virus protection software, periodic scans etc.

Unfortunately, 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 any data transmitted to the site and any such 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.

Sharing your data

We shall not share your personal information unless we are entitled to do so. The categories of persons with whom we may share your personal information include:

- Individuals, hirers and other third parties, necessary for the provision of our Recruitment Services
- Any regulatory authority or statutory body pursuant to a request for information or any legal obligation which applies to us
- Parties who process data on our behalf include:
 - IT support
 - storage service providers including cloud
 - background screening providers
 - Legal and professional advisers
 - Insurers

Sending data outside of the European Economic Area

If we do transfer data outside the EEA, we will make sure that it is protected in the same way as if it were being used in the EEA. We will use one of the following safeguards to ensure that it is protected:

- Transfer the data to a non-EEA country which has privacy laws at least as protective as those within the EEA
- Put in place a contract with the recipient of the data which means the recipient must protect the data to the same standards as required within the EEA
- Transfer it to organisations which are part of the Privacy Shield. The Privacy Shield is a framework which sets out the standards for data to be sent between the United States and European countries. The Privacy Shield ensures that data is protected to the same standards as used within the EEA.

Your rights

You are entitled to see copies of all personal data held by us and to amend, correct or delete such data. You can also limit, restrict or object to the processing of your data.

You can change your personal information, after logging into your account or you can message us at tfp.support@topfivepercent.co.uk.

To raise any objections or to exercise any of your rights, you can send an email to us at tfp.support@topfivepercent.co.uk or you can write to us at: Data Protection, Topfivepercent Ltd, 56 Leman Street, London, E1 8EU, London, UK

When you get in touch, we will come back to you as soon as possible within one month after we verify your identity.