

Privacy Notice – Your Personal Data

Who we are & what we do

ISS Infra Safety Services Labour Limited ('ISSL') provide nationwide services across rail and construction and related sectors. We provide a range of services where your personal data may be involved including:

- Recruitment solutions
- Specialist projects and work services deploying our own workers
- Training
- Work finding services

ISSL respects your privacy and is committed to protecting your personal data.

This website is not intended for children and we do not knowingly collect data relating to children.

ISSL has a Compliance Department who are responsible for overseeing questions in relation to this privacy notice. If you have any questions, please contact us.

Contact details

ISS Infra Safety Services Labour Limited

Company Registration Number: 06253082

Email address: *SQEteam@isslabour.co.uk*

Postal address: Unit 5 Sidney Robinson Business Park, Ascot Drive, Derby DE24 8EH

Telephone number: 01332 571650

The Point of this Notice?

This privacy notice will let you know **how we look after your personal data** when you visit our website and engage with ISSL, it also provides an explanation of your privacy rights and how the law protects you.

What Personal Data?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

When you visit our website or contact us, you may complete a form or make an enquiry, we collect personal information as a result and this is used by ISSL to manage your enquiry.

ISSL collects and processes your personal data through your use of this website, and your wider engagement with us, including when you get in touch with us using a web form, sign up to receive a newsletter or when you apply to us (using forms in our **knowledge centre**, over the phone or in person) so we can provide services to you, and in performing those services and engaging with our clients in relation to you.

We collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity & Contact Data** includes first name, last name, username or similar identifier, title, date of birth and gender, address, email address and phone numbers.
- **Financial & Transaction Data** includes bank account and payment card details, payment details to and from you.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Employment and Training History Data** includes
- **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.
- We do collect some limited **Special Category Personal Data** about you (this may include 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). We also may collect information about criminal convictions and offences.
- We will only collect such **Special Category Personal Data** as required in order to provide our services to you, to engage with clients who might offer you work and to meet legal obligations. We will not share that information without your specific agreement unless we are legally obliged to do so, or the processing is necessary for carrying out contractual obligations, or obligations in the field of employment, or necessary for assessment of working capacity and suitability or in the public interest.
- **Third parties or publicly available sources.** We may receive personal data about you from publicly available sources such as Companies House and the Electoral Register based inside the EU.
- Driver and related history from DVLA, subject to us completing any process required by DVLA with you to allow access and limited use of that information.

How we use your personal data

We use personal data in the following circumstances:

- Where we need it to perform the contract, we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal or regulatory obligation, specifically relating to right to work, qualification for roles and authorisations held, driving and conviction history, health and safety and tax and financial record keeping.
- Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to the Special Categories of Personal Data details of which and condition for processing are set out above.

- We may also send direct marketing communications to you via email or text message based on consent. You have the right to withdraw consent to marketing at any time by contacting us or using the unsubscribe opportunities which will be presented to you when we communicate with you on a direct marketing basis.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

Purpose/Activity	Type of data	Basis for processing
<p>1. To register you as a new candidate or customer including gathering information necessary to allow you to be offered as a worker or recruit and to establish your suitability, health, training, employment, driving and criminal conviction history (to the extent reasonably required and only as permitted by law) taking particular note of the Rehabilitation of Offenders Act 1974.</p>	<p>(a) Identity & Contact (b) Special Category (c) Employment & Training</p>	<p>(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Assessment of working capacity (d) necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment</p>
<p>2. To process and engage with you, in respect of job opportunities, training courses and worker support services including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Manage assignment and engagement related activities, for example time and attendance and incidents management.</p> <p>(c) Engage with you in respect of worker support services, training records and training.</p>	<p>(a) Identity & Contact (b) Financial & Transaction (c) Marketing and Communications (d) Special Category (e) Employment & Training</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Necessary to comply with a legal obligation (d) assessment of working capacity (e) necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment</p>

<p>3. To manage our relationship with you and our potential clients and clients who may want to engage you or provide assignments which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Informing you of relevant opportunities and worker support</p> <p>(c) engaging with client feedback and assignment and engagement related issues.</p>	<p>(a) Identity & Contact</p> <p>(b) Marketing and Communications</p> <p>(c) Special Category</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p> <p>(d) Necessary to comply with a legal obligation</p> <p>(e) assessment of working capacity</p> <p>(f) necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity & Contact</p> <p>(b) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity & Contact</p> <p>(b) Marketing and Communications</p> <p>(c) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity & Contact</p> <p>(b) Marketing and Communications</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (as we develop our products/services and to grow our business)</p>

Marketing

Our communication about the delivery of services is separate to any marketing we might undertake.

You may receive marketing communications from us if you have requested information from us or purchased goods or services from us and, you have not opted out of receiving that marketing. You can unsubscribe at any time from our use of your personal data for marketing and advertising communication by contacting us at SQEteam@isslabour.co.uk or by using the unsubscribe link which is in any e-mail marketing communication we provide.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes. We will ensure that any such request is entirely clear and easy to understand, providing you with control of your personal data use.

Change of purpose

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 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.

Disclosures of your personal data

We may share personal information with the following organisations

- Clients where we are providing work opportunity and recruitment related services.
- Service providers acting as processors for us based in the UK who provide IT and system administration and business support services to us.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require us by law to maintain and report information to them.
- The Sentinel scheme for track workers.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties 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.

We will update this list from time to time.

International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**).

Data security

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. 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. 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.

Data retention

How long will you use my personal data for?

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 and the purposes for which we process your personal data.

By law we have to keep basic information about our customers (including Some Contact and Identity & Financial and Transaction Data) for six years after they cease being customers for tax purposes. We also retain proof of entitlement to work, health data and qualification information to allow us to comply with a legal or regulatory obligation which may require us to make that

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see below to find out more about these rights.

If you wish to exercise any of these rights, please contact us SQETeam@isslabour.co.uk

No fee usually required

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.

What we may need from you

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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month, for example if your request is particularly complex or you have made a number of requests. In this case, we will notify you within a month of your complaint, keep you updated and respond in no more than two further months.

Right to Complain

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). We would be happy to consider and assist you with any concern you may have so would be delighted if you might contact our Compliance Team in the first instance: Unit 5 Sidney Robinson Business Park, Ascot Drive, Derby, DE24 8EH. 01332 571650.

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