



MANUFACTURING IN ENGLAND®

PRIVACY POLICY

INTRODUCTION

K V MANUFACTURING LTD (company number 9144374) is committed to protecting the privacy of our Candidates, Clients, Suppliers and other relevant parties. We want to provide a safe and secure user experience. We will ensure that the information you submit to us via our website or through any other means is only used for the purposes provided for as set out in this policy.

This Privacy Policy explains what we do with your personal data.

It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is very important to us, and we are committed to protecting and safeguarding your data privacy rights.

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the “GDPR”), the company responsible for your personal data is (“K V MANUFACTURING LTD” or “us” or “we”).

WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

Candidates - In order for us to keep you informed about relevant opportunities, we request to hold your personal data. If you do not allow us to do this, we may be legally obliged to remove you from our database and can no longer consider you for such opportunities.

Clients - We use information about you, or individuals at your organisation, in the course of providing you services.

Suppliers - We use information about you, or individuals at your organisation, in the course of administering the services you provide as part of a contractual arrangement between us.

WHAT INFORMATION DO WE COLLECT?

Candidates - Typically, we collect details about your current and previous employers, details of your work, skills, experience, education and qualifications. We only ask for details that will help us to help you, such as your name, contact details, education details, employment history, and right to work status (and of course you may choose to share other relevant information with us).

We will store pertinent details of our relationship which could include elements such as records of interviews, opportunities we have put you forward for, information you have provided to us such as a CV and copies of correspondence.

Where we have placed you, for example in a permanent role, in order for us to administer the contract we will store further information which could include start and end dates, pay history, and bank details. This is to enable us to administer the contract.

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Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our relationship.

Below is a non-exhaustive list of personal data we may collect :

- Name; Age/date of birth; Gender; Photograph; Marital status; Contact details; Education details;
- Employment history; Emergency contacts and details of any dependants; Referee details;
- Nationality/citizenship/place of birth; Right to Work / Immigration status (whether you need a work permit);
- A copy of your address confirmation / passport and/or driving licence / identity card;
- National Insurance number and any other tax-related information;
- Diversity information including racial or ethnic origin, religious or other similar beliefs, and physical or mental health, including disability-related information;
- Details about your current remuneration, pensions and benefits arrangements;
- Information on your interests and needs regarding future employment, both collected directly and inferred, for example from jobs viewed or articles read on our website;
- Extra information that you choose to tell us;
- Extra information that your referees chooses to tell us about you;

Clients - If you are a K V MANUFACTURING LTD customer, we need to collect and use information about you, or individuals at your organisation, in the course of providing you services.

We usually only need to have your contact details or the details of individual contacts at your organisation (such as their names, telephone numbers and email addresses) to ensure that our relationship runs smoothly.

We use information about you, or individuals at your organisation, in the course of providing you services.

Suppliers - Usually all we require is contact details of relevant individuals at your organisation so that we can communicate with you, such as names, telephone numbers and email addresses. We also need other information such as your bank details so that we can pay for the services you provide as part of a contractual arrangement between us.

Other – such as Referees and Emergency Contacts (3rd party information)

In order to provide Candidates with suitable work opportunities, we require some basic background information (such as name, email address and telephone number). We only ask for very basic contact details, so that we can get in touch with you either for a reference or because you've been listed as an emergency contact for one of our Candidates.

HOW DO WE COLLECT YOUR PERSONAL DATA?

Candidate Data - There are two main ways in which we collect your personal data:

- Directly from you, the Candidate;
- From third parties, for example, Job Boards.

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Personal data received directly from you, the Candidate

K V MANUFACTURING LTD needs to know certain information about you in order to provide a tailored service. This will enable us to provide you with the best opportunities.

There are numerous ways you can share your information with us. These may include:

- Entering your details on the K V MANUFACTURING LTD website or via an application form, as part of the registration process;
- Leaving a hard copy CV at a K V MANUFACTURING LTD event or at our office;
- Emailing your CV to a K V MANUFACTURING LTD employee or being interviewed by them.

Personal data received from third parties

We also receive personal data from other sources. Depending on the relevant circumstances and applicable laws and requirements, these may include personal data received in the following situations:

For example :

- We may obtain information about you from searching for potential candidates from third party sources, such as LinkedIn and other job sites;
- Your referees may disclose personal information about you;

Our Clients may share personal information about you with us;

If you 'like' our page on Facebook or 'follow' us on Twitter we will receive your personal information from those sites.

Client data

There are two main ways in which we collect your personal data:

- Directly from you;
- From third parties (e.g. our Candidates) and other limited sources (e.g. online and offline media).

Personal data received directly from you, the Client

We will receive data directly from you in two ways:

- Where you contact us proactively, usually by phone or email; and/or
- Where we contact you, either by phone or email, or through our business development activities more generally.

Personal data received from third parties

Where appropriate and in accordance with any laws and requirements, we may seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence including:

- From third party market research and by analysing online and offline media;
- From delegate lists at relevant events; and
- From other limited sources and third parties (for example from our Candidates to the extent that they provide us with your details to act as a referee for them).

Supplier Data

We collect your personal data during the course of our work with you.

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Other – such as Referees and Emergency Contacts

We collect your contact details only where a Candidate gives us details as their emergency contact or where a Candidate gives them to us in order for you to serve as a referee.

HOW DO WE USE YOUR PERSONAL DATA?

Candidate Data

The main reason for using your personal details is to help you find employment or other work roles that might be suitable for you.

The more information we have about you, your skillset and your ambitions, the more tailored we can make our service.

Where appropriate and in accordance with local laws and requirements, we may also use your personal data for things like marketing and diversity monitoring. Where appropriate, we will seek your consent to undertake some of these activities.

We generally use Candidate data in four ways:

- Recruitment Activities;
- Marketing Activities;
- Equal Opportunities / Statistical Monitoring; and
- To help us to establish, exercise or defend legal claims.

Recruitment Activities

We've listed below various ways in which we may use and process your personal data for this purpose :

- Collecting your data from you and other sources, such as LinkedIn and job boards;
- Storing your details (and updating them when necessary) on our database, so that we can contact you in relation to recruitment;
- To facilitate the recruitment process;
- Assessing data about you against vacancies which we think may be suitable for you;
- Enabling you to submit your CV, apply online for jobs or to subscribe to alerts about jobs we think may be of interest to you;
- Carrying out our obligations arising from any contracts entered into between us;
- Facilitating our administration, payment and invoicing processes;
- Carrying out surveys;
- Verifying details you have provided, using third party resources, or to request information (such as references, qualifications and potentially any criminal convictions, to the extent that this is appropriate and in accordance with local laws);
- Complying with our legal obligations in connection with the detection of crime or the collection of taxes or duties; and
- Processing your data to enable us to send you targeted, relevant communications which we think are likely to be of interest to you.
- We may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not happy about this, in certain circumstances you have the right to object.

*Please note that this list is not exhaustive.

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Marketing Activities

We may periodically send you information that we think you may find interesting. In particular, we may wish to use your data to enable us to market our full range of products to you.

We would need your consent for some aspects of marketing activities which are not covered by our legitimate interests (in particular, the collection of data via cookies, and the delivery of direct marketing to you through digital channels) and, depending on the situation, we'll ask for this via an 'explicit opt-in' or 'soft-opt-in'.

'Soft opt-in' consent is a specific type of consent which applies where you have previously engaged with us (for example by submitting a job application or CV, or registering a vacancy to be filled). Under 'soft opt-in' consent, we will take your consent as given unless or until you opt out. For most people, this is beneficial as it allows us to suggest other jobs to you alongside the specific one you applied for, significantly increasing the likelihood of us finding you a new position. For other types of e-marketing, we are required to obtain your explicit consent.

Equal opportunities and Statistical monitoring / other sensitive personal data

We are committed to ensuring that our recruitment processes are aligned with our approach to equal opportunities. Some of the data we may collect about you comes under the heading of 'diversity information'. This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background. Where appropriate and in accordance with local laws and requirements, we'll use this information on an anonymised basis to monitor our compliance with our equal opportunities policy.

This information is what is called 'sensitive' personal information and slightly stricter data protection rules apply to it. We therefore need to obtain your explicit consent before we can use it. We'll ask for your consent by offering you an opt-in. This means that you have to explicitly and clearly tell us that you agree to us collecting and using this information.

We may collect other sensitive personal data about you, such as health-related information, religious affiliation, or details of any criminal convictions if this is appropriate and is required for a role that you are interested in applying for. We will never do this without your explicit consent.

Client Data

The main reason for using information about Clients is to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly.

We generally use Client data in three ways:

- Product Promotion Activities;
- Marketing Activities; and
- To help us to establish, exercise or defend legal claims.

Product Promotion Activities

We've listed below various ways in which we may use and process your personal data for the purpose of product promotion activities:

- Maintaining your details within our systems to enable us to contact you in relation to our product promotion activities;

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- Maintaining records of our conversations and meetings;
- Client satisfaction surveys.

Marketing Activities

We may wish to use your data to enable us to market our full range of products to you.

Supplier Data

The main reasons for using your personal data are to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly, and to comply with legal requirements.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Candidates

We may share your personal data with various parties within the organisation for various reasons. With individuals and organisations who hold information related to your reference or application to work with us, such as current, past or prospective employers, educators and examining bodies and employment and recruitment agencies;

With tax, audit, or other authorities, when we believe, in good faith, that the law or other regulation requires us to share this data. For example, because of a request by a tax authority or in connection with any anticipated litigation;

Third party partners and job boards where we consider this will improve the chances of finding you the right job.

Third parties retained to provide services such as reference, qualification and criminal convictions checks, to the extent that these checks are appropriate.

Clients

We will share your data internally to ensure that we provide you with a suitable product information.

With tax, audit, or other authorities, when we believe, in good faith, that the law or other regulation requires us to share this data. For example, because of a request by a tax authority or in connection with any anticipated litigation.

Suppliers

Where appropriate we may share your personal data, in various ways and for various reasons, with the following categories of people:

- Any of our group / associated companies;
- With tax, audit, or other authorities, when we believe, in good faith, that the law or other regulation requires us to share this data. For example, because of a request by a tax authority or in connection with any anticipated litigation.

HOW DO WE SAFEGUARD YOUR PERSONAL DATA?

We care about protecting your information. That's why we put in place reasonable and appropriate measures that are designed to prevent unauthorised access to, and misuse of, your personal data.

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We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach.

If you suspect any misuse, loss of, or unauthorised access to your personal information please let us know immediately.

HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

We will hold your data for no longer than three years after we have had significant contact with you (or, where appropriate, the company you are working with, for, or providing your services through) before seeking confirmation that you are happy for us to continue to hold your data. If we have placed you as an employee, we will hold your data for such period as we believe in good faith that the law or relevant regulators require us to preserve your data, or in connection with any anticipated litigation.

HOW CAN YOU ACCESS, AMEND OR RETRACT YOUR PERSONAL DATA?

The main objectives of GDPR is to protect and clarify the rights of EU citizens and individuals in the EU with regards to data privacy.

You retain various rights in respect of your data, even after you have given it to us. To get in touch about these rights, detailed below, please contact us. We will seek to deal with your request without undue delay, and in any event within one month, subject to any lawfully entitlement to extend this period.

We may keep a record of your communications to help us resolve any issues which you raise.

Right to object (Art. 21 GDPR)

The right to object enables you to object to us processing your personal data where we do so for one of the following three reasons:

- our legitimate interests;
- to send you direct marketing materials; and
- for scientific, historical, research, or statistical purposes.

The “legitimate interests” and “direct marketing” categories above are the ones most likely to apply to our Candidates, Clients and Suppliers. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless:

- we can show that we have compelling legitimate grounds for processing which overrides your interests; or
- we are processing your data for the establishment, exercise or defense of a legal claim.

If your objection relates to direct marketing, we must act on your objection by ceasing this activity.

Right to withdraw consent (Art. 7 GDPR)

Where we have obtained your consent to process your personal data for certain activities (for example, for our marketing arrangements), you may withdraw this consent at any time and we will cease to carry out the particular activity that you previously consented to unless we consider that there is an alternative reason to justify our continued processing of your data for this purpose in which case we will inform you of this condition.

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Data Subject Access Requests (Art. 15 GDPR)

You may ask us to confirm what information we hold about you at any time, and request us to rectify or erasure of the information. We will ask you to verify your identity and for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is “manifestly unfounded or excessive”. If you request further copies of this information from us, we may charge you a reasonable administrative cost where legally permissible. We may refuse your request, where we are legally permitted to do so. If we refuse your request we will always tell you the reasons for doing so.

Right to erasure (‘right to be forgotten’) (Art. 17 GDPR)

In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to “erase” your personal data. We will respond to your request within 30 days (subject to any lawfully entitlement to extend this period) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will erase your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data is collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

Normally, to enable us to agree your request to erasure, the information must meet one of the following criteria:

- The data is no longer necessary for the purpose for which we originally collected and/or processed them;
- where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
- the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
- it is necessary for the data to be erased in order for us to comply with our legal obligations as a data controller; or
- if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

We would only be entitled to refuse to comply with your request for one of the following reasons:

- to exercise the right of freedom of expression and information;
- to comply with legal obligations, for the performance of a task carried out in the public interest or in the exercise of official authority;
- for public health reasons in the public interest;
- to exercise or defend a legal claim.

When complying with a valid request for the erasure of data we will take all reasonably practicable steps to erase the relevant data.

Right to restriction of processing (Art. 18 GDPR)

You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either -

- One of the circumstances listed below is resolved;
- You consent;

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- Or further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important EU or Member State public interest.

The circumstances in which you are entitled to request that we restrict the processing of your personal data are:

- You contest the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
- You object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
- Where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
- Where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.

If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will notify you before lifting any restriction on processing your personal data.

Right to rectification (Art. 16 GDPR)

You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. Where appropriate, we will also tell you which third parties we have disclosed the inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

Right to lodge a complaint with a supervisory authority (Art 77. GDPR)

You also have the right to lodge a complaint with the supervisory authority.

Details of the supervisory authority:

The Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow, Cheshire, SK9 5AF
Telephone : 0303 123 1113

RESPONSIBILITY FOR PROCESSING PERSONAL DATA ON THE K V MANUFACTURING LTD WEBSITE

K V MANUFACTURING LTD controls the processing of personal data on its website.

LAWFUL REASONS FOR PROCESSING YOUR DATA

LEGITIMATE INTERESTS

Article 6(1)(f) of the GDPR says that we can process your data where it "is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of [you] which require protection of personal data."

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We don't think that any of the following activities prejudice individuals in any way, we believe they help us to offer you a more tailored, efficient service. However, you do have the right to object to us processing your personal data on this basis. If you would like to know more about how to do so, please see the section '8. HOW CAN YOU ACCESS, AMEND OR RETRACT YOUR PERSONAL DATA?'

Candidate Data

We believe it's reasonable to expect that if you are looking for employment or have posted your professional CV information on a job board or professional networking site, you are happy for us to collect and otherwise use your personal data to provide our recruitment service to you and assess your skills against our bank of vacancies. We may also want to double check any information you've given to us or to confirm your references, qualifications to the extent that this is appropriate and in accordance with local laws. We need to do these things so that we can function as a business, and to help you and other Candidates obtain the working roles you desire.

We have our own obligations under the law. If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection, tax collection or actual or anticipated litigation.

Client Data

To ensure that we provide you with the best service possible, we store your basic personal data and/or the personal data of individual contacts at your organisation as well as keeping records of our conversations and meetings. From time to time, we may also ask you to undertake a customer satisfaction survey. We believe this to be reasonable – we deem these uses of your data to be necessary for our legitimate interests as an organisation providing services to you.

Supplier Data

We use and store the basic personal data of individuals within your organisation in order to facilitate the services from you as one of our Suppliers. We also hold your organisations financial details, so that we can pay you for your services. We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.

Other – such as Referees and Emergency Contacts

If your details have been given to us by a Candidate as one of their referees, we use your personal data in order to contact you for a reference. This is part of our quality procedures and so we deem this to be necessary for our legitimate interests as an organisation offering employment.

If an employee has given us your details as an emergency contact, we will use these details to contact you in the case of an accident or emergency. We believe this to be a vital element of our organisation, and so is necessary for our legitimate interests.

CONTRACT

Article 6(1)(b) of the GDPR gives us a lawful basis for processing where “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”

Therefore, we are able to process personal data where:-

We have a contract with you and we need to process your personal data to comply with the obligations under the contract; or

We haven't yet got a contract with you, but you have asked us to do something as the first step and we need to process your personal data to fulfil the request.

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CONSENT

In certain circumstances, we are required to obtain your consent to the processing of your personal data in relation to certain activities. Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.

Article 4(11) of the GDPR states that (opt-in) consent is “any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.” This means that:

- you have to give us your consent freely, without us putting you under any type of pressure;
- you have to know what you are consenting to – so we’ll make sure we give you enough information;
- you should have control over which processing activities you consent to and which you don’t; and
- you need to take positive and affirmative action in giving us your consent – we’re likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

We will keep records of the consents that you have given in this way.

We have already mentioned that, in some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you which are related to the recruitment activity as long as you do not actively opt-out from these communications.

As we have mentioned, you have the right to withdraw your consent to these activities. You can do so at any time.

COMPLIANCE WITH A LEGAL OBLIGATION

Article 6(1)(c) of the GDPR gives us a lawful basis for processing where “processing is necessary for compliance with a legal obligation to which the controller is subject”

Therefore, we are able to process personal data where:-

We have a contract with you and we need to process your personal data to comply with our legal obligations under relevant law.

ESTABLISHING, EXERCISING OR DEFENDING LEGAL CLAIMS

Sometimes it may be necessary for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing “is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity”.

This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

CONTACT US

For any matter relating to the processing of personal data, or this policy document, you can write to us at the following address –

K V MANUFACTURING LIMITED
UNIT 1 SITE J, ALBERT DRIVE
BURGESS HILL, WEST SUSSEX
RH15 9TN

Alternatively, please send an email to – contactus@kvmanufacturing.com

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