

NEUVEN SOLUTIONS LTD PRIVACY NOTICE

1. OUR DETAILS

Neuven Solutions Limited ("we", "us" and "our") is committed to protecting and respecting your privacy.

Any reference to "we" or "us", "our" or "Neuven" means Neuven Solutions Limited, which is a private limited company with registered company number 06304127 or, where applicable, our group companies. Our registered office address is Manchester International Office Centre, Styal Road, Manchester M22 5WB.

This privacy notice (together with our website terms of use and our cookie policy <http://www.neuven.co.uk/terms-privacy/> and any other documents referred to in them) sets out the basis on which we collect information from you and how we use information which we collect or which you provide to us. This includes information which we collect or that you provide manually or via our website or other online services and platforms (including, but not limited to, our Venneu and Venloc platforms) (together, our "Sites") and information provided to us directly or via our Sites by our clients and the agencies we work with.

If you have any questions regarding how we use your information or you wish to exercise any of your rights in relation to your information (as set out in paragraph 7 below), please contact our Data Manager at martin.shaw@neuven.co.uk or at Manchester International Office Centre, Styal Road, Manchester M22 5WB.

2. WHAT INFORMATION DO WE COLLECT AND HOW DO WE USE IT?

The table set out in the Schedule summarises the information we collect and hold, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

3. WHERE INFORMATION MAY BE HELD

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents.

4. LEGAL BASIS FOR USING YOUR INFORMATION

In accordance with data protection law, we are obliged to inform you that we are using your information as described in this policy on one or more of the following legal bases:

- you have given your consent to us using your information as described in this notice;
- the use is necessary to perform a contract between us or to take steps which you requested us to take before entering into a contract;
- the use is necessary to comply with a legal obligation to which we are subject;
- the use is necessary to save your life or that of another individual;

- the use is necessary for the performance of a task carried out in the public interest or in the exercise of our official authority;
- the use is necessary for the purposes of our legitimate interests, including the provision of our services to our clients and the agencies we work with, direct marketing, fraud prevention or preventing crime and protecting public security.

5. USE OF YOUR SENSITIVE PERSONAL INFORMATION

We may on occasion collect sensitive personal information about you. By way of example, to enable us to provide our clients with our services, our clients or their agency partners may provide us with your right to work information.

We will use this sensitive personal information for the purposes of identifying individuals to combat fraud and other criminal activity and to support our clients and the agencies we work with in meeting their legal obligations. We will share this sensitive personal information with the police and our insurers and other organisations that provide similar products and services to ours for the purpose of fraud and crime prevention.

6. HOW LONG DO WE KEEP YOUR INFORMATION FOR?

In accordance with our legal data protection and privacy obligations, we will only retain your information for as long as is necessary for the purpose for which it was collected.

We will then either securely delete it or anonymise it so that it cannot be linked back to you.

See **the Schedule** for full details of those purposes.

7. MANAGING YOUR INFORMATION

You can contact us with any queries about how we use your information at any time by contacting our Data Manager on 0161 437 4337 martin.shaw@neuveu.co.uk or at Manchester International Office Centre, Styal Road, Manchester M22 5WB.

It is very important to us that all the information we hold about you remains accurate and up to date to reduce the risk of a misunderstanding.

You have a number of rights which we respect and aim to uphold in everything we do. These rights are set out below.

We reserve the right not to comply with any requests we receive where we may lawfully do so, for example if we reasonably believe a request to be malicious, technically very onerous, to involve disproportionate effort or harmful to the rights of others.

- a) **Asking us about your information** You have the right to ask us whether we hold information about you and, if so, for us to give you certain details about that information and/or the information itself. This right is commonly known as a **subject access request**. If you would like to make a subject access request, please do so in writing to the address above.

- b) **Correcting inaccurate information** If you have reason to believe any of the information we collect on you may be inaccurate or incomplete, please contact us with your queries and/or with the updated information.
- c) **Erasing information** You have the right to require us to erase your information in the following circumstances:
- the information is no longer necessary for the purposes for which we collected it;
 - we need your consent to use the information and you withdraw your consent;
 - you object to us using your information: (1) for the performance of a task carried out in the public interest; or (2) for the purposes of our legitimate interests (e.g. direct marketing) and there are no overriding legitimate grounds for the processing;
 - you unsubscribe from our marketing communications;
 - we have used your information unlawfully; or
 - the information must be erased for compliance with a legal obligation to which we are subject.
- d) **Restricting processing** You have the right to require us to restrict our use of your information where one of the following applies:
- while we verify the accuracy of the information that we hold about where you contest the accuracy of the same;
 - we have used your information unlawfully, but you request us to restrict its use instead of erasing it;
 - we no longer need the information for the purpose for which we collected it, but you need it to deal with a legal claim; or
 - while we check whether our legitimate grounds override your right to object where you have objected to us using your information.
- e) **Right to object** Where we are using your information on the basis of public interest or our legitimate interests (see paragraph 4), you have the right to object to this at any time by contacting us using the contact details set out below.
- f) **Withdrawal of consent** Where you have given your consent to us using your information (e.g. for marketing purposes), you have the right to alter your preferences or withdraw this consent at any time by contacting us using the contact details set out below or, where applicable, through managing your preferences through your online account with us or clicking the 'unsubscribe' link. This will not affect the lawfulness of any use of your information that we make before you amend your preferences or withdraw your consent.

If you have any questions or complaints about our use of your information, please contact our Data Manager on 0161 437 4337 or at martin.shaw@neuken.co.uk or at Manchester International Office Centre, Styal Road, Manchester M22 5WB.

We hope that our Data Manager can resolve any query or concern you raise about our use of your information but you can also contact the Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

THE SCHEDULE
ABOUT THE INFORMATION WE COLLECT AND HOLD

The information we collect	How we collect the information	Why we collect the information, how we use it and how we may share it
1.	<p>Your names and contact details, including your email address, telephone number(s) and delivery address</p>	<p>From you on our website, on the telephone, by email.</p> <p>We may collect this data from the following third parties:</p> <ul style="list-style-type: none"> a) our clients; or b) our clients' agency partners. <p>To register you as a temporary worker on our Sites.</p> <p>Legitimate interest: this is necessary to perform a contract between us and our clients.</p> <p>Information shared with: Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them for the supply services to our clients.</p> <p>Legitimate interests: fraud prevention and your interests and fundamental rights do not override those interests.</p> <p>Information shared with: credit reference agencies who provide anti-fraud and credit score information to us as necessary in order to benefit from their services.</p> <p>To contact you from time to time about our services, news, offers, new competitions and sponsored events.</p> <p>Legitimate interests: marketing and your interests and fundamental rights do not override those interests.</p>

The information we collect	How we collect the information	Why we collect the information, how we use it and how we may share it	
		<p>To communicate with you about operational changes to our website and our services, for example if we were to withdraw a feature of our services or change this Privacy Notice.</p> <p>Legitimate interests: marketing and your interests and fundamental rights do not override those interests.</p>	
2.	<p>Information on what you search for, view, click on and access: in and through our website, our marketing emails and text messages (SMS or MMS). We may collect the time and geographic location of your device when you do so. This information may also include where you came to our website from, and where you went when you left it. We also track how often you visit and use our website. We do this through the use of email and website cookies. Our cookie policy gives you detailed information on how we use them http://www.neuven.co.uk/terms-privacy/</p>	<p>From our website.</p> <p>We may collect this data from the following third parties:</p> <ul style="list-style-type: none"> c) analytics providers; d) advertising networks; and/or e) search information providers. 	<p>To gather statistics about how you and other people use our website, and what you think of our adverts, offers, news, product information, competitions, sponsored events, social media and other digital content. We then analyse these statistics to understand if these things meet most people's needs, or if they should be improved, and if so, what design or other changes (for example, around the nature and timing of communications) would be most beneficial for our customers and our business.</p> <p>Legitimate interests: marketing and your interests and fundamental rights do not override those interests.</p> <p>Information shared with:</p> <ul style="list-style-type: none"> a) Advertisers and

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		<p>advertising networks which require the data to select and serve relevant adverts to you and others; and/or</p> <p>b) Analytics and search engine providers who assist us in the improvement and optimisation of our website.</p>
		<p>To understand you better and, in particular, your habits, your location from time to time, your personal circumstances and those of your family or household and the things you may like, dislike and be interested in.</p> <p>Legitimate interests: marketing and your interests and fundamental rights do not override those interests.</p>
		<p>To enable us and our third party service providers to plan and manage our day-to-day business and related services as effectively as possible.</p> <p>Legitimate interests: marketing and your interests and fundamental rights do not override those interests.</p>

The information we collect	How we collect the information	Why we collect the information, how we use it and how we may share it
		<p>Information shared with: Our third party service providers</p>
3.	<p>Your social media content (where this is in the public domain) and any messages you send us via social media. This information can include posts, comments, pictures and video.</p>	<p>Public social media channels.</p>
<p>To respond to any social media posts or other public comments you make where these are made to or about us, our website, our products, mobile apps, services or other activities.</p> <p>Legitimate interests: marketing and your interests and fundamental rights do not override those interests.</p> <p>We may share your posts and comments on social media, for example by liking your LinkedIn posts or retweeting your tweets on Twitter.</p>		
4.	<p>Technical information about the devices you use to access our website. We collect each device's unique identifying code (MAC address), relevant IP address, operating system and version, web browser and version, and geographic location.</p>	<p>From our website.</p>
<p>To provide you with our website, which requires a certain amount of technical information to be collected in order to work properly.</p> <p>This is necessary for the purposes of ensuring network and information security and our legitimate interests: marketing and your interests and fundamental rights do not override those interests.</p> <p>Information shared with: other people and businesses who help us provide our website and related services to you, for</p>		

	The information we collect	How we collect the information	Why we collect the information, how we use it and how we may share it
			<p>example, information technology companies who design and host our website.</p>
5.			<p>To power security measures and related services relating to your access to our website for example to enable us to recognise your username and password and reset these if you forget them.</p> <p>Legitimate interests: ensuring network and information security and your interests and fundamental rights do not override those interests.</p> <p>Information shared with: other people and businesses who help us provide our website and related services to you, for example, information technology companies who design and host our website.</p>
			<p>To test new systems and processes as we roll them out to make sure they work and will meet the high expectations we set for ourselves.</p> <p>Legitimate interests: ensuring network and information security and your interests and fundamental rights do not override those interests.</p>

	The information we collect	How we collect the information	Why we collect the information, how we use it and how we may share it
			<p>Information shared with: other people and businesses who help us provide our website and related services to you, for example, information technology companies who design and host our website.</p>
6.	Contact, Financial and Transaction Data	From providers of technical, payment and delivery services.	<p>To test new systems and processes as we roll them out to make sure they work and will meet the high expectations we set for ourselves.</p> <p>Legitimate interests: ensuring network and information security and your interests and fundamental rights do not override those interests.</p> <p>Information shared with: other people and businesses who help us provide our website and related services to you, for example, information technology companies who design and host our website.</p>
7.	Identity and Contact Data	<p>From data brokers or aggregators.</p> <p>From publicly available sources such as Companies House.</p>	<p>To protect you and our business against any other criminal behaviour, including identity theft and fraud.</p> <p>Legitimate interests: the prevention of fraud and other crime and your interests and fundamental</p>

The information we collect	How we collect the information	Why we collect the information, how we use it and how we may share it
		<p>rights do not override those interests.</p> <p>Information shared with: central and local government departments, for example the Driver Vehicle Licensing Agency (DVLA) and local authorities who run the UK electoral rolls, banks and finance companies who also provide anti-fraud services as necessary in order to benefit from their services</p>
8.	Basic background information on you available from government sources.	<p>To protect you and our business against any other criminal behaviour, including identity theft and fraud.</p> <p>Legitimate interests: the prevention of fraud and other crime and your interests and fundamental rights do not override those interests.</p> <p>To make sure that the contact details we hold for you remain accurate and to fill in any basic gaps.</p> <p>Legitimate interests: marketing and your interests and fundamental rights do not override those interests.</p> <p>Information shared with: central and local government departments, for example the Driver</p>

	The information we collect	How we collect the information	Why we collect the information, how we use it and how we may share it
			Vehicle Licensing Agency (DVLA) and local authorities who run the UK electoral rolls, banks and finance companies who also provide anti-fraud services as necessary in order to benefit from their services.
9.	Information on the electoral roll	By checking the name and address you, our clients or their agency partners give us against the electoral roll.	<p>To make sure that the contact details we hold for you remain accurate and to fill in any basic gaps.</p> <p>Legitimate interests: marketing and your interests and fundamental rights do not override those interests.</p>
10.	Information from banking, credit card and credit reference agencies about your financial status and the status of any payment card presented to us (for example, if it has been reported stolen) to check we are likely to be paid for any transaction and to reduce the risk of fraud.		<p>To check that you have or are likely to have the means to pay us.</p> <p>Legitimate interests: fraud prevention and your interests and fundamental rights do not override those interests.</p> <p>Information shared with: Credit reference agencies who provide anti-fraud and credit score information to us as necessary in order to benefit from their services.</p>
11.	CCTV footage of you if you visit our offices.	CCTV cameras in and outside our offices.	<p>To prevent and detect crime.</p> <p>Legitimate interests: crime prevention and your interests and fundamental rights do not override those interests.</p>

The information we collect	How we collect the information	Why we collect the information, how we use it and how we may share it
		We may share this with law enforcement agencies for the purpose of preventing and detecting crime.
12.	Any of the information referred to above in this table.	<p>In the process of anonymising your information so that you are no longer identifiable to us.</p> <p>To assist us in the development of new products and services over time, for example to gauge whether a new product is likely to appeal to a large proportion of our customer base.</p> <p>Information shared with:</p> <ul style="list-style-type: none"> a) The prospective buyer of any part of our business or assets that we may sell. b) Our professional advisers for example our lawyers, accountants and technology consultants when they need it to provide advice to us. c) The police, local authorities, HM Revenue & Customs (HMRC), the courts and any other central or local government bodies where they request

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		<p>it and we may lawfully disclose it, for example for the prevention and detection of crime.</p> <p>d) Other people who make a subject access request to us, where we are allowed to do so by law (see Managing Your Information for what we mean by a subject access request).</p> <p>e) We may also share the information we collect where we are legally obliged to do so, for example, to comply with a court order.</p> <p>f) Our insurers and insurance brokers where required in order for us to be able to obtain insurance against risks we face in running our business.</p>