



Just People Privacy Notice

Our Company Details

Name- Just People (HR) Limited
Registered Address- Blencathra House, Graham Street, Penrith, CA11 9LE
Telephone Number-01768 216775
Email address- getintouch@justpeoplehr.com
Data Protection Contact- Natalie Ruane

How we use your information

We will collect information about you and keep this on our computers, in our email, in cloud storage and on paper for a certain period of time.

The main reasons for this are to:

- deliver the HR and legal services we have agreed in contract to provide to you. For example, we may use your information to write letters on your behalf or prepare documents to help you with your matter;
- comply with the law. For example, as solicitors we have to perform 'conflicts of interest'
 checks for new cases against a list of current and former clients. We also have a legal duty to
 report suspicious activity to the National Crime Agency ('NCA') if we suspect money
 laundering.

In some cases, we may hold more 'sensitive' information about you such as about health. This may be necessary to pursue your legal matter. We are permitted to use such information to provide legal advice to you or in connection with equality legislation.

You can withdraw consent to your information being used in a particular way but this may limit what more we can do for you (if anything).

As a client we may also in the future send you a newsletter or similar and find that most clients find this helpful. We rely upon the 'legitimate interest' we have in maintaining contact with former clients to do this in data protection law and your agreement for the purposes of the Privacy & Electronic Communications Regulations (which can be implied under these Regulations). However, we will never share your information with third parties to market to you and will not contact you about non-HR and legal services. We will make it quick and easy to 'opt out' of future communications in every communication sent. If you already know that you do not want to receive these messages then you can opt out now by emailing sarahb@justpeoplehr.com

Your information may be kept on computer servers within the European Union. If at any point information is stored on computer servers outside of the EU, we have selected countries which are





HR and Legal Support

either approved for this purpose (under Article 45 of the data protection rules) or are located where we are happy that the safeguards in place in that country to protect your information are appropriate (under what was Article 45 of the data protection rules).

We do not use your personal information to make 'automated decisions' which affect you.

Our website

On our website, if you submit an enquiry this will be also stored within this website's database. This is currently the only occasion where personal data will be stored on this website.

Our website collects and uses personal information for the following reasons:

1. Site visitation tracking

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor

GA makes use of cookies, details of which can be found on <u>Google's developer guides</u>. Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

2. Contact forms and email links

Should you choose to contact us using the contact form on our Contact us page or via email, the data will be collated into an email and received by our devices using our GDPR compliant email system.

This website is hosted within a UK data centre.

External Certifications

ISO 27001: Information Security Management System

ISO 14001: Environment Management System

ISO 9001: Quality Management System PCI Data Security Standards (PCI DSS)

BSI PAS 2060: Carbon Neutral NIC EIC Approved Contractor





Protection of Hardware & Data

ISO 27001:2013 (Info Security Mgmt.), ISO 9001:2008 (Quality) and PCI DSS Access control
Proximity cards
Staffed 24/7/365 (by SIA-accredited staff)
CCTV - internal and external
2.8m secure fencing and razor wire perimeter fence
Site-specific, dedicated firewall technology
24hr NSOI-accredited security patrol

Additional Security

Not only do we protect your data from threats, but we also continuously monitor and control all of our security and fire systems using a number of additional systems. These systems include network connectivity and latency CCTV systems, cage and entry door access controls as well as the physical grounds, temperature, moisture and humidity levels in individual suites and power levels (down to individual power bars within racks).

All traffic (transferral of files) between this website and your browser is encrypted and delivered over HTTPS.

Will you share my information with anyone else?

Generally speaking, we will not share your information with third parties unless this is part of the work on your legal matter. For example, we may need to send certain information about you to other lawyers working on the case, to Court or to government bodies such as the Land Registry. In rare circumstances we sometimes need to make reports of suspicious activity to the NCA. We do also work with some trusted contractors or consultants who may have access to your information such as service providers or copiers.

All contractors have a contract with us which requires that your information is accessed appropriately and kept confidential (among other data protection requirements).

How long will you keep my information?

Generally speaking, files are destroyed after 6 years. Certain original documents or files may need to be kept longer if there is a big risk of destroying something which is needed. We will also always keep a small amount of information after file closure to do conflicts of interest searches in the future to comply with our professional duties.

Can I see what information you hold about me?

We do normally have a right to payment of any outstanding costs before releasing a whole file but you do have a separate right under the data protection rules to access your 'personal data' without





charge. This may include having it in a particular electronic format ('portable' format). Please contact **Sarah Bell** on **sarahb@justpeoplehr.com** if you would like to request a copy of your personal data.

What if I have other questions or concerns?

Our general contact details are set out above and, on the website.

Our information officer is **Natalie Ruane**, email: **natalie@justpeoplehr.com**. Please contact Natalie if you want to exercise one of your data protection 'rights' and in particular if you:

- wish to complain about how your personal data is being used;
- wish to request that our records about your personal information be corrected or deleted;
- If you have a complaint about how your personal information is being used which we have not been able to address please note that you may be able to make a complaint to the Information Commissioner's Office (ICO) directly.

Changes to Privacy Policy

This privacy policy may change from time to time in line with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check our website www.justpeoplehr.com occasionally for any policy changes.