

## **Hallmark Solutions Limited**

### **PRIVACY NOTICE**

#### **Who We Are**

Hallmark Solutions Limited specialise in the delivery of IT related projects, including consultancy, project management, software development and training. We host specialist HR and Recruitment websites on behalf of our clients.

We are a Company registered in Northern Ireland (Company Number NI024831). Our registered office is at Unit 14 McKibbin House, Eastbank Road, Carryduff, BT8 8BD.

We are committed to protecting your privacy and promise to respect your personal information and do all we can to keep it safe. We aim to be clear about how we obtain your details and only process them in ways we believe you would reasonably expect.

We always aim to communicate with you respectfully, effectively and efficiently.

#### **Privacy Policy in Brief**

It is important that you read the full policy to understand what information we hold, how we may use it and what your rights are- but if you don't have time to read it all now, here's a quick summary:

- We collect information that is personal data. Personal data is information that can be used to help identify an individual, such as name, address, phone number, email address, IP addresses or website pages accessed.
- We collect information about everyone who engages with Hallmark. This could be customers, employees or those who use the websites we host.
- We collect information to provide services or goods, to provide information to clients and prospective clients and for administration purposes.
- We only collect the information that we need or that you agree we can collect.
- We do our best to keep personal information secure wherever we collect personal data online.
- We never sell your data and we will never share it with another company for their own purposes.
- We only share data where we are required by law or with carefully selected service providers who carry out work for us. We recognise the importance of ensuring that all our service providers treat your data as carefully as we would, use it only as instructed, and allow us to check that they do this.
- Our websites use cookies. For more information, please check our cookies policy.

These are the key points of the privacy policy. You will find the policy in full below, so you've got all the details you need.

This policy applies to all the websites we operate, our use of emails and postal mailings for marketing purposes, and any other methods we use for collecting

information. It covers what we collect and why, what we do with the information, what we won't do with the information, and what rights you have.

### **What is personal data and what information do we collect?**

We will only ever collect the information we need- including data to help improve our services- or which you agree we can collect.

Personal data means information that can be used to identify you. It can include;

- Your name
- Your contact details whether personal or business, including postal address, email, telephone numbers along with your preferences as to which of these we should use to contact you in the future.
- Your date of birth
- Payment information such as bank account, direct debit, debit or credit card details
- Your position within an organisation.
- Internet Protocol addresses, details of pages visited on our websites and files downloaded.
- Other personal information or sensitive data you share with us

Further Personal Data we may collect when we operate recruitment or HR websites on behalf of our clients.

- Description of work experience, education details and details of skills and experience
- Details of referees
- Equal Opportunity Monitoring Information
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### **How we Collect this Information**

We collect personal information each time you deal with us or in connection with specific activities.

#### **(1) When you give it to us DIRECTLY including;**

- When you engage with our Social Media platforms
- When you attend a meeting or an event, fill out a questionnaire or have a conversation with us and provide us with information about yourself.
- When you contact us to register to receive news about our work, sign up to our online content or you telephone, email, write to or text Hallmark.
- Engaging with and inputting data on websites we operate on behalf of our clients.
- Or otherwise provide us with personal information

Please note: You don't have to disclose any of this information to browse our websites. However, if you choose to withhold requested information, we may not be able to provide you with certain services.

## (2) Other information that is available publicly

This may include information found in publicly available sources such as Companies House, LinkedIn, government websites and information that has been published in reputable media.

## (3) Social Media

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, we might have permission to access information from those sources. We will not add this information to your personal details.

## (4) When we collect information as you use our website:

Like most websites, we use 'cookies' to help us make our sites and the way you use them, better. Cookies are small text files that sites transfer to your device (computer, phone or tablet) and make interacting with a website faster and easier- for example, by automatically filling in your name and address in text fields.

Hallmark may store information about you and your activity in cookies. If you want to delete any cookies that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that stores cookies.

If you wish to restrict or block web browser cookies that are set on your device, you can do this through your browser settings; the Help function within your browser should tell you how. Alternatively, you may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org), which contains comprehensive information on how to do this on a wide variety of desktop browsers.

## How do we use personal data?

The information we gather helps us to send you what you want when you want it and to ensure that our communication with you is relevant and timely.

We will use your personal information to;

- Provide you with information, resources or services you have requested from us. We will not send you direct marketing if you have not provided your consent.
- Keep a record of your correspondence, questions you have asked us or comments or complaints you have made
- Analyse use of our websites and ensure their content is presented in the most effective manner for you.
- Ensure that we know how you prefer to be contacted
- Understand how we can improve our customer experience based on your interests and interaction with us.

## **Opting Out;**

You can choose at any time which marketing materials or information you want to receive from Hallmark and in which format. You can change or stop what you receive from us by following the instructions at the bottom of any postal communication or email or by contacting us at \_\_\_

What is our legal basis for processing data?

### **Consent-**

From May 2018, we will use your consent for the provision of information (such as newsletters, updates of our work and activities and details of events) by way of email, post, telephone or online communication delivered by us. Each email communication you receive provides a clear opportunity for you to opt out of/unsubscribe from future email communications.

When you engage with websites we operate on behalf of our clients, you may request to be provided with information pertaining to similar jobs and vacancies. Hallmark will only contact you if you have 'opted in' to receive this information. Hallmark are not responsible for any contact our clients may make with you directly.

**Contractual Basis-** We will use a contractual basis for processing data relating to the provision of goods, services (including the operation of HR and recruitment websites we operate on behalf of our clients) or resources you have requested or purchased and events you have booked.

### **Legitimate Interest-**

If you are an existing client, we will use your support for us over the previous three-year period as a legitimate interest reason to continue sending you the communications you receive from us. If you have previously asked us not to contact you, we will continue to respect your wishes.

We will ensure that at all times, we balance the interest of Hallmark against your rights and freedoms, having due regard to your reasonable expectations about the use of your data.

### **Security and Protecting your Personal Information**

The security of your information is very important to us. We ensure that there are appropriate controls and procedures in place to protect your personal details. For example, information you submit on a physical form or when filling out online forms is encrypted and stored on a secure server. We will also carry out annual penetration tests.

Despite all the security and protection, we put in place, the internet cannot be guaranteed to be 100% secure. Therefore, you submit data at your own risk.

We undertake regular reviews of who has access to information we hold to ensure that your details are only accessible by appropriately trained and authorised staff.

## **Sharing Your Personal Information**

Your information may occasionally be passed to service providers who perform functions on our behalf. These companies may only see your information to perform these functions and may not use it for any other purpose. We carry out comprehensive checks on these companies before we work with them and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they have collected or to which they have access. They are required to destroy this information once the function for which it has been transferred has been carried out.

When you engage with websites we host on behalf of our clients, your personal information will be accessible by your employer or prospective employer. Hallmark are not responsible for their use of your personal data and would advise that you consult their respective privacy policies.

Links to other websites within our website or websites we host on behalf of our clients are not covered by this Privacy Policy and individuals should check the terms of the privacy policies for those sites. Hallmark is not responsible for the content or policies of external websites.

Your information is not transferred outside the United Kingdom.

## **Keeping your information up to date**

When possible, we use publicly available sources to keep your records up to date and accurate. We also take appropriate measures to ensure that information is only kept for as long as is necessary and only for the purpose for which it was given.

We would appreciate if you let us know if your contact or personal details change, as this gives us consent to use the updated information and continue to communicate with you.

## **How long we will keep your information for:**

- We will hold your personal information on our systems for as long as is necessary to carry out the activity relevant to your interaction with us.
- If you input your personal information onto our HR and Recruitment websites, you have the right to delete your account at any point by logging in and deleting. Additionally, after a 1-year inactivity period on your account we will initiate the deletion of your account and personal information. Before the inactivity deletion takes place, Hallmark Solutions will send three reminder emails in advance of the 1-year inactivity period being reached.
- If you ask us to cease communications with you, we will keep a record of your contact details and appropriate information to enable us to comply with your request.
- Where your information is no longer required, we will ensure that it is disposed of in a secure manner.
- Our clients, who we operate websites on behalf of, may retain your information on their personal databases beyond the time that Hallmark hold

your data. Hallmark are not responsible for our client's retention of your data, including any contact they make with you directly.

### Your Rights under this policy

We'd like to keep all who engage with Hallmark up to date with our activities and progress. So, to update you on what we're doing and ask whether you are able to support us, we'd like to keep in touch with you (by post, phone, email, text and other electronic means) about our progress and how you can continue to engage with us.

We will not use your information for marketing or fundraising purposes if you have asked us not to or we do not have your permission to use it for these purposes. However, we will retain your basic details on a suppression list to help ensure that we do not continue to contact you.

If you are registered to receive our email communications, every email communication provides a clear opportunity for you to opt out or unsubscribe from future email communications.

The General Data Protection Regulation gives you certain rights over your data and how we use it. You have a right to;

- Request a copy of the information we hold about you and details of what we do with that information
- Update or amend the information we hold about you if it is wrong.
- Change your communication preferences at any time
- Withdraw your consent to use of your personal information where we are relying on consent as the legal ground for processing it.
- Ask us to remove your personal information to your records. We will respond to your request within one month of receipt. Where the request is excessive, we reserve the right to request an extension of a period of two months and request a reasonable administration fee.
- Ask us to restrict the processing of your personal information.
- Obtain a portable copy of certain personal information
- Object to the processing of your information for marketing purposes.
- Raise a concern or complaint about the way in which your information is being used
- Ask us to explain any automated processing we carry out and the impact of this on you.

If you wish to exercise any of these rights or change your preferences on either what you receive from us or how you receive it, please contact Hallmark Solutions.

### Changes to the Policy

Hallmark may change this Privacy Notice from time to time. If we make any significant changes in the way we treat your personal information, we will make this clear on the Hallmark website and/or by contacting you directly