

## **Website Privacy Policy**

This is the Website privacy policy for Lucas Kennedy Limited, the owner and provider of this Website. Lucas Kennedy Limited takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the website. **Please read this privacy policy carefully.**

1. In this privacy policy, unless the context requires a different interpretation;
  - a. The singular includes the plural and vice versa;
  - b. References to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
  - c. A reference to a person includes firms, companies, government entities, trusts and partnerships;
  - d. "including" is understood to mean "including without limitation";
  - e. Reference to any statutory provision includes any modification or amendment of it;
  - f. The headings and sub-headings do not form part of this privacy policy.

### **Data collected**

2. We may collect the following data, which includes personal Data, from you:
  - a. Name
  - b. Job Title;
  - c. Profession;
  - d. CV
  - e. Salary;
  - f. Daily Rate;
  - g. Location / Resides
  - h. Previous assignment and / or assignment
  - i. Contact Information such as email addresses and telephone numbers;In each case, in accordance with this privacy policy.

### **Scope of this privacy policy**

3. This privacy policy applies only to the actions of Lucas Kennedy Limited and Users with respect to this Website. It does not extend to any websites that can be accessed from this website including, but not limited to, any links we may provide to social media websites.

### **Our use of data**

4. For Purposes of the Data Protection Act 1998, Lucas Kennedy Limited is the "data controller"
5. We will retain any Data you submit for 10 years.
6. Unless we are obliged or permitted by law to do so, and subject to any third-party disclosures specifically set out in this policy, your Data will not be disclosed to third parties. This does not include our affiliates and / or other companies within our group.
7. All personal Data is stored securely in accordance with the principles of the Data protection Act 1998. For more details on security see the clause below (**Security**)
8. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:
  - a. Internal record keeping;
  - b. Payroll;In each case, in accordance with this privacy policy.

### **Third party websites and services**

9. Lucas Kennedy Limited may, from time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. The providers of such services have access to certain personal Data provided by Users of this Website.
10. Any Data used by such parties is used to the extent required for them to perform the services that we request. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties will be processed within the terms of this privacy policy and in accordance with the Data Protection Act 1998.
11. Upon registering via the Lucas Kennedy website, personal data including, Name, Email address, type of role required, and CV are entered and collated via Survey Monkey and picked up by only 2 members of Lucas Kennedy.
  - a. SurveyMonkey Inc. participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and Swiss-U.S.
  - b. In general survey responses to SurveyMonkey surveys are controlled and managed by the Lucas Kennedy, the Creator (the person who sent or deployed that survey). In those instances, SurveyMonkey is only processing those responses on behalf of the Creator.
  - c. SurveyMonkey will use automated processes and machine learning, to analyze survey responses, which in turn helps us to aggregate response data and activity and Extract and analyse usage patterns
  - d. As a Creator using SurveyMonkey any account information and data will be shared with the primary administrator(s) which is restricted to 2 employees at Lucas Kennedy initially. Upon applying for assistance, registering your CV or requesting assistance from you, as a client, in filling an assignment or placement, and upon selecting the consent button, you give consent to the relevant persons within Lucas Kennedy receiving the personal data. This will be for the sole purpose you have initially passed and selected via the Lucas Kennedy Website.
  - e. SSL encrypts the survey and the results as they are sent between your respondents and SurveyMonkey.

### **Links to other websites**

12. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

### **Changes of business ownership and control**

13. Lucas Kennedy Limited may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Lucas Kennedy Limited. Data provided by users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purpose of which it was originally supplied to us.
14. We may also disclose Data to a prospective purchaser of our business of any part of it. This data will be a restricted amount to name, pay rate and charge rate only for purchase reasons relating to the financial level of the company. No other personal data will be viewable to a prospective buyer.
15. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

### **Controlling use of your Data**

16. Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:
17. Use of data for direct marketing purposes; and
18. Sharing Data with third parties.

### **Functionality of the website**

19. To use all features and functions available on the Website, you may be required to submit certain Data.
20. You may restrict your internet browser's use of Cookies. For more information see the clause below (**Cookies**)

### **Accessing your own Data**

21. You have the right to ask for a copy of any of your personal Data held by Lucas Kennedy Limited (where such Data is held) on payment of a small fee, which will not exceed £10 per request.

### **Security**

22. Data security is of great importance to Lucas Kennedy Limited and to protect your Data we have put in place physical, electronic and managerial procedures to safeguard and secure Data collected via this website.
23. We endeavour to do our best to protect your personal Data. However, transmission of information over the internet is not entirely secure and is done at your own risk. We cannot ensure the security of your Data transmitted to the Website.

### **Cookies**

24. This website may place and access Cookies on your computer. Lucas Kennedy uses Cookies to improve your experience of using the Website. Lucas Kennedy Limited has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
25. All Cookies used by this website are used in accordance with current UK and EU Cookie Law
26. Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Lucas Kennedy Limited to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies, however certain features of the Website may not function fully or as intended.
27. This Website may place the Cookies for Analytical / performance cookies. They allow us to recognise and count the number of visitors who move around our website when they are using it. This assists us to improve the way our website works.
28. You can choose to enable or disable Cookies in your internet browser. By default, more internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser

### **Transfer outside the European Economic Area**

29. Data which we collect from you may be stored and processed in and transferred to countries outside of the EEA (European Economic Area). This may occur if one of our service providers or clients is situated in a country outside the EEA or our servers are located in a country outside the EEA. These countries may not have data protection laws equivalent to those in force in the EEA.
30. If we transfer Data outside the EEA in the above way, Lucas Kennedy will take appropriate steps to ensure that your privacy rights continue to be protected.

### **General**

31. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

**Changes to this policy**

32. Lucas Kennedy Limited reserves the right to change this privacy policy as we may deem necessary from time to time or may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website.