



## **GDPR Policy**

Last updated: July 2023

### **About Us**

This GDPR Policy sets out how GFFC LTD collects, uses, stores, and protects personal data in compliance with the General Data Protection Regulation (GDPR). This policy applies to all personal data processed by GFFC in relation to our website and any products or services offered.

GFFC Ltd is registered in England, with the trading address: 105 High St, Brentwood, Essex, CM14 4RR. For the purposes of the General Data Protection Regulation (EU) 2016/679 (or 'GDPR'), GFFC LTD is a data controller with respect to the personal data that you provide to us.

GFFC (or 'We' or 'Us or 'Our'') is committed to respecting and protecting your privacy. Questions and comments about this privacy notice are welcomed. These, and any enquiries about the processing of your personal data, should be directed to [admin@gffc.io](mailto:admin@gffc.io) in the first instance.

### **What is Personal Data?**

The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified by reference to data items such as: name, contact details, unique identification numbers, location data or online identifiers.

### **Special Categories of Personal Data**

The GDPR refers to sensitive data as 'special categories' of personal data. Special categories are: racial and ethnicity information, political, philosophical or religious beliefs, trade-union membership, genetic and biometric data, health information and anything concerning an individual's sex life.

### **Business Contacts**

This privacy notice applies to representatives of previous, prospective, and active clients, suppliers and business partners. The information in this Privacy Notice should be provided at the point of data capture or upon the first contact with the individual.

### **How GFFC uses your information**

In order to maintain business to business relationships, GFFC needs to collect personal data about you. This is required for the legitimate interests of GFFC for correspondence purposes, to develop commercial propositions and for service provision where a contract exists between GFFC and the organisation that you work for.

GFFC will process – that means collect, store and use – the information you provide in a manner

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that is compatible with the GDPR. We will endeavour to keep your information accurate and up to date and not keep it for longer than is necessary. In some instances, the law sets the length of time information must be kept, but in most cases, we use a set of retention rules to ensure that data is not retained any longer than to fulfil the purpose for which it has been collected. These retention rules are documented within our Record of Processing Activities.

The aim is not to be intrusive, and we will not ask irrelevant or unnecessary questions. Moreover, the information you provide to us will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure. These measures are described in our Data Protection and Information Security Policies.

### **What information GFFC may collect from you**

Under the lawful basis of legitimate interests, GFFC may collect the following categories of information:

- Name and contact details (e.g. Email address, phone number, office address)
- Job title and position within the company
- Requirements and preferences
- General correspondence between both parties

Our purposes for processing:

- To identify and pursue commercial opportunities in order to deliver services to our clients
- To appropriately address business related documentation such as purchase orders or invoices to the correct contacts
- To maintain an up-to-date record of contact details for standard business correspondence and customer relationship management
- To keep clients updated about our services and educational resources

In addition to the above, we also have a legal obligation to collect and store contact details and signatures on contracts and NDAs, in order to maintain confidentiality and be contracted to undertake agreed programmes of work.

Where we use your personal information for marketing and communications purposes such as the distribution of a corporate newsletter or webinar invitations, you may opt out at any time, simply by emailing [unsubscribe@admin.io](mailto:unsubscribe@admin.io). We will immediately withdraw your name from our marketing contact list.

GFFC does not process any special categories of personal data, regarding our business contacts and no automated profiling or decision making takes place.

### **Disclosure of your personal data**

GFFC will never disclose your data to other parties for their own use. Your personal data may be processed by a limited number of service providers, for example the company that provides and supports our Customer Relationship Management system, and our accountancy partner. These parties are contracted to GFFC, are obliged to keep your details secure and use them for no other



purpose than to fulfil the service that they provide to us.

### **Your rights**

You have the right to access information held about you. You have a right to request a copy of the personal data you have provided, to be sent to you or other parties in machine readable format (data portability). Where there are any changes to the purposes for which your data is processed, or any changes to the way in which your personal data is disclosed, you have a right to be informed of these changes. GFFC will do this by updating our privacy policies on our website and / or contacting you with the relevant information in a timely and transparent manner.

You have the right to ask for your personal data to be rectified where there is an inaccuracy and you have the right to ask for your personal data to be erased, where there is no overriding legal basis for it to be retained. You have the right to ask for your data not to be processed for marketing purposes and where any processing of personal data is carried out on the basis of your consent, you have the right to withdraw that consent as easily as it was given.

You have the right to object to decisions GFFC has taken about the processing of your personal data and, where you believe GFFC has contravened the General Data Protection Regulations, you have the right to lodge a complaint with the Information Commissioner's Office.

You have the right to request that processing of your personal data is restricted, where there is an objection or request for rectification pending, or where you require data that would otherwise be deleted to be retained, for example for the defence of legal claims.

For any questions about, or to exercise any of your rights as a data subject, please contact [admin@gffc.io](mailto:admin@gffc.io).

### **Employee & Consultants**

This privacy notice applies to any individuals who have applied for a role with GFFC "Employees" or any individuals whose services have been actively engaged through any of the available resourcing contract models. (e.g. Permanent, fixed term, day rate or retainer) "Consultants".

### **How GFFC uses your information**

In order to consider you for employment, or engage your services, GFFC needs to collect personal data about you.

It is in the legitimate interests of GFFC to ensure that prospective Employees and Consultants meet a required standard, to offer employment or engagement of services. There is also a duty of care to you as an Employee, to comply with employment law and to enable the fulfilment of any contract that may exist between yourself and GFFC. Failure to provide the required information in a timely manner may result in us being unable to provide you with employment.

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that is compatible with the GDPR. We will endeavour to keep your information accurate and up to date and not keep it for longer than is necessary. In some instances, the law sets the length of time information must be kept, but in most cases, we use a set of retention rules to ensure that data is not retained any longer than to fulfil the purpose for which it has been collected. For successfully engaged individuals, some of the information we collect will become part of your long-term personnel file. As we operate a flexible resource model, we do also retain a database of prospective Consultants. We periodically delete prospect data where we have not been able to make contact for 12 months and we immediately remove any prospect data on request from that individual. Our retention rules are contained within our Record of Processing Activities.

The aim is not to be intrusive and we will not ask irrelevant or unnecessary questions. Moreover, the information you provide to us will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure. These measures are described in our Data Protection and Information Security Policies.

#### **What information GFFC may collect from you**

Under the lawful basis of legal obligation, GFFC may collect the following categories of information:

- Medical information, occupational health assessments or information on any ongoing condition which may require us to consider any “reasonable adjustments”
- Disability status
- Maternity / paternity related information in line with statutory requirements
- Payroll, payment, national insurance and financial information
- Name, nationality, date of birth
- Proof of identification and proof of address
- Proof of right to work in the UK
- Emergency contact / Next of Kin
- Information relating to disciplinary, grievance or redundancy procedures

A description of these legal obligations:

- To fulfil our duty of care in considering any “reasonable adjustments” that are required in the workplace
- To comply with the disability rights in relation to employment
- To enable us to comply with statutory requirements relating to statutory leave
- To enable us to comply with HMRC regulations
- To perform Anti-Money Laundering check and to vet you in accordance with the relevant regulating bodies
- To enable verification of your right to work in the UK in accordance with Home Office regulations
- To ensure a nominated person can be contacted in case of emergency in accordance with Health and Safety standards
- To adhere to employment law with regard to the appropriate handling of disciplinary procedures and staff exits

Health related information is a ‘special category’ of data which requires a second lawful basis for



processing. In this regard, processing is necessary for the purposes of occupational medicine, for the assessment of the working capacity of the Employee or Consultant.

Under the lawful basis of contractual obligation, GFFC may collect the following categories of information:

- Personal information such as employee reference number, name, address and contact details
- Bank details
- Medical history and pre-existing medical conditions
- Feedback on your performance e.g. appraisals etc.

A description of these contractual obligations:

- To enable an up-to-date record of your details as required, to contact, pay and maintain a duty of care to you
- To enable the establishment of employee benefits such as pensions and health insurance
- To monitor your performance against your contracted terms and conditions

Under the lawful basis of legitimate interests, GFFC may collect the following categories of information:

- Personal information such as name, work email address, job role
- General correspondence between employees and consultants and clients
- Information or CV used in job applications including previous employment history details
- Information on identity and criminal record for security licensing
- Beneficiary details
- Training records and requirements
- Photographs (Head shots) – for marketing or communication purposes

A description of these legitimate interests:

- To provide you with communications relevant to your employment such as payslips, P60s and job opportunities
- To manage the workforce operations for example, the use of information on rotas and timesheets
- To maintain a record of business-related communications
- To be able to assess your suitability for specific job vacancies available within the business
- To ensure any benefits due to you are executed in accordance with your wishes
- To maintain a record of your skills and experiences
- To gain security licenses for our Employees and Consultants in accordance with client requirements
- To record the attainment of, and provide you with, appropriate training and qualifications
- To be able to identify Employees and Consultants at all GFFC and client sites
- To promote Consultant profiles to prospective clients during the tendering process



- To promote GFFC workforce and employee achievements in publications and communications such as newsletters, blog posts, social media and our company website

In addition to the above, we also collect data on equality and diversity, including ethnicity, religion and sexual orientation – it is entirely optional whether you provide this information if, for example, you would like us to facilitate prayer times within the role. Where this information is gathered, it may also be compiled into anonymised statistics in order to provide insight and promote the rich diversity of the GFFC workforce.

### **Disclosure of your personal data**

GFFC will never disclose your data to other parties for their own use. Your personal data may be passed on to our service providers for example vetting agencies, insurers, employee benefits, pension providers, time recording and HR Systems, payroll, training providers and occupational health professionals who are contracted to us during your employment lifecycle. These service providers are obliged to keep your details secure and use them only for the specific services that they provide for you, on our behalf. Once this service need has been satisfied, they will dispose of data in line with our retention procedures.

In addition to this, GFFC provides services to clients. In circumstances where your resource forms part of such a service, your name and skills profile may be provided to those clients so that you can be identified and set up to work on those client sites.

GFFC may give out your work mobile number and work email addresses as part of day-to-day business operations, to facilitate correspondence between our employees, our clients and our suppliers.

In rare circumstances, we operate services overseas. If you have volunteered for such an assignment, any transfer of your information overseas will only happen where adequate levels of data protection are in place, with effective safeguards such as binding corporate rules.

### **Your rights**

You have the right to access information held about you. You have a right to request a copy of the personal data you have provided, to be sent to you or other parties in machine readable format (data portability). Where there are any changes to the purposes for which your data is processed, or any changes to the way in which your personal data is disclosed, you have a right to be informed of these changes. GFFC will do this by updating our privacy policies on our website and / or contacting you with the relevant information in a timely and transparent manner.

You have the right to ask for your personal data to be rectified where there is an inaccuracy and you have the right to ask for your personal data to be erased, where there is no overriding legal basis for it to be retained. You have the right to ask for your data not to be processed for marketing purposes and where any processing of personal data is carried out on the basis of your consent, you have the right to withdraw that consent as easily as it was given.

You have the right to object to decisions GFFC has taken about the processing of your personal



data and where you believe GFFC has contravened the General Data Protection Regulations, you have the right to lodge a complaint with the Information Commissioner's Office.

You have the right to request that processing of your personal data is restricted, where there is an objection or request for rectification pending, or where you require data that would otherwise be deleted to be retained, for example for the defence of legal claims.

You also have the right to request meaningful information about the logic involved in any automated decision-making or profiling processes. Although we do not use any such internal processes, automated services from third parties may be used as part of the Employee and Consultant screening process such as the Disclosure Barring Service. These checks are necessary to provide you with a contract for such roles where these standards are a requirement.

For any questions about, or to exercise any of your rights as a data subject, please contact [admin@gffc.io](mailto:admin@gffc.io).