

Opera Group Companies – Website and General Privacy Policy

Company Name	The Opera Group (“The Company”)
Opera Group Companies	Richmond Nursing Ltd ProhealthCare Ltd Opera Holdings Ltd Freight Personnel Ltd Total Staff Services Ltd WorkBank Recruitment Ltd Head Start Recruitment (a trading name of Workworld Ltd) Choice Bureau (a trading name of Workworld Ltd) Staff Call Merlin Financial Consultants
Company Contact details:	The Data Protection Officer, Opera Holdings, 15 Wheatstone Court, Waterwells Business Park, Quedgeley, Glos, GL2 2AQ Email: dataprotection@operagroup.co.uk
Policy Effective Date	25/5/18

The Opera Group knows that your personal information is very important to you. The purpose of this statement is to explain how we may use the information we obtain about you.

The “Website Privacy Policy” section below covers all Opera Group websites and sets out the different areas where user privacy is concerned. It outlines the obligations and requirements of the users, the website and the website owners and it details the way Opera Group websites process, store and protect user data and information. By visiting and/or registering on any of the Opera Group websites, you agree to this use.

The “General Privacy Policy” section covers how The Opera Group handles and processes personal data in all areas, including within its offline databases and administration systems.

The Opera Group reserves the right to amend this policy at any time: we will notify you of any necessary changes.

For the purpose of the Data Protection Act 2018 and the EU GDPR regulations, the data controller is The Opera Group.

Contents

Website Privacy Policy	3
Storage of your personal information	3
Use of Cookies	3
Website Data Collection	4
Website Email Newsletters	4
External Links	5
Adverts and Sponsored Links	5
Social Media Platforms	5
Shortened Links in Social Media	5
Resources & Further Information	6
General Privacy Policy	7
Collection and use of personal data	7
Purpose of processing and legal basis	7
Legitimate interest	8
Recipient/s of data	8
Overseas Transfers	9
Data retention	9
Your rights under GDPR	10
• The right to access	10
• The right to rectification of your personal data;	10
• The right to erasure of your personal data in certain circumstances;	10
• The right to restrict processing of your personal data;	10
• The right to data portability in certain circumstances;	11
• The right to object to processing of personal data based on public or legitimate interest; .	11
• The right not to be subjected to automated decision making and profiling;	11
• The right to withdraw consent at any time	11
• Your right to object to direct marketing	11
Complaints or queries	11

Website Privacy Policy

Opera Group websites and their owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of their users throughout their visiting experience. The websites comply with all UK national laws and requirements for user privacy.

Storage of your personal information

We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.

It is important for you to protect against unauthorised access to your password and to your computer. Be sure to logout when you finish using a shared computer.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

Use of Cookies

The websites use cookies to improve the users' experience when visiting the websites. Where applicable, the websites use a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the websites to provide the users with a tailored experience. Users are advised that if they wish to deny the use and saving of cookies from Opera Group websites on to their computer's hard drive they should take necessary steps within their web browser's security settings to block all cookies from this website and its external serving vendors.

Opera Group websites use tracking software to follow how visitors use the websites. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information <http://www.google.com/privacy.html>

Other cookies may be stored to your computer's hard drive by external vendors when Opera Group websites use referral programs, sponsored links or adverts. Such cookies are used for sales conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

Website Data Collection

Users and owners of Opera Group websites do so at their own discretion and provide any such personal details as are requested at their own risk. Your personal information is held securely and stored privately as per the regulations set out in the Data Protection Act 2018 and the EU GDPR regulations. Every effort has been made to ensure that your personal data is transmitted and stored securely and safely in line with IT security best practice.

Any information submitted by you through the Opera Group websites may be used to provide you with the products and services offered by Opera Group companies, or to assist you with answers to any questions or queries you may have submitted. A more detailed explanation of how the data you enter may be stored and processed is available in the “General Privacy Policy” section below.

Your details are not passed on to any third parties except for the purposes made clear in the General Privacy Policy as specified below.

Website Email Newsletters

Opera Group websites may operate an email newsletter program, used to inform subscribers about Opera Group Company products and services including services supplied by Opera Group websites. Your details may be used to subscribe you to Opera Group email newsletters but only if this was made clear to you and your express permission was granted when submitting any online form. Or whereby you the consumer have previously purchased from or enquired about purchasing from an Opera Group company a product or service that the email newsletter relates to.

Subscriptions are taken in compliance with UK Spam Laws detailed in the Privacy and Electronic Communications Regulations 2003. All personal details relating to subscriptions are held securely and in accordance with the Data Protection Act 2018 and the EU GDPR regulations. No personal details are passed on to third parties nor shared with companies or people outside of the Opera Group Company operating the website. Under the Data Protection Act 2018 and EU GDPR regulations you may request details of the personal information held about you by the Opera Group websites. If you would like a copy of the information held on you, please write to the Data Protection Officer using the contact details at the top of this policy.

Email marketing campaigns published by Opera Group websites or their owners may contain tracking facilities within the actual email. Subscriber activity is tracked and stored in a database for future analysis and evaluation. Such tracked activity may include the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity. This information is used to refine future email campaigns and supply the subscriber with more relevant content based around their activity.

In compliance with UK Spam Laws and the Privacy and Electronic Communications Regulations 2003 subscribers are given the opportunity to un-subscribe at any time through an automated system. This process is detailed at the footer of each email campaign. If an automated un-subscription system is unavailable clear instructions on how to un-subscribe will be detailed instead.

External Links

Our websites aim to include safe and relevant external links. However, users are advised to adopt a policy of caution before clicking any external web links located on Opera Group websites. (External links are clickable text, banners or images which link to websites outside the control of The Opera Group and associated technology suppliers).

The owners of Opera Group websites cannot guarantee or verify the contents of any externally linked website despite their best efforts. Users should therefore be aware that they click on external links at their own risk and that Opera Group websites and their owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Adverts and Sponsored Links

Opera group websites may contain sponsored links and adverts. These will typically be served through advertising partners, who may have detailed privacy policies relating directly to the adverts they serve.

Clicking on any such adverts will send you to the advertiser's website through a referral program which may use cookies and track the number of referrals sent from the relevant Opera Group website. Such tracking may include the use of cookies as explained above. Users should therefore note they click on sponsored external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Social Media Platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are subject to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. Opera Group websites nor their owners will not ask for personal or sensitive information through social media platforms, nor encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

Opera Group websites may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised, before using such social sharing buttons, that they do so at their own discretion and should note that the social media platform concerned may track and save a user's request to share a web page through the social media platform account of the user making the request.

Shortened Links in Social Media

This website and its owners through their social media platform accounts may share web links to relevant web pages. By default, some social media platforms shorten lengthy URLs [web addresses] (this is an example: <http://bit.ly/zyVUBo>).

Users are advised to take caution and good judgement before clicking any shortened URLs published on social media platforms by Opera Group websites and their owners. Despite best efforts to ensure only genuine URLs are published, many social media platforms are prone to

SPAM and hacking, consequently Opera Group websites and their owners cannot be held liable for any damages or implications caused by following any shortened links.

Resources & Further Information

- [Data Protection Act 2018](#)
- [General Data Protection regulation \(GDPR\)](#)
- [Privacy and Electronic Communications Regulations 2003](#)
- [Privacy and Electronic Communications Regulations 2003 – The Guide](#)
- [Twitter Privacy Policy](#)
- [Facebook Privacy Policy](#)
- [Google Privacy Policy](#)
- [Linkedin Privacy Policy](#)
- [Mailchimp Privacy Policy](#)

General Privacy Policy

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The Opera Group and its member companies provide work-finding services to its clients and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our websites, or we may collect them from another source such as a jobs board or when talking with you on the telephone. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you, we will only use your personal data in accordance with the terms of the following statement.

Collection and use of personal data

Purpose of processing and legal basis

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. As well as normal types of data we may collect sensitive data for the purposes of equal opportunities and sickness recording, DBS and criminal record checks and recording health data in sickness records. The legal bases we rely upon to offer these services to you are:

- Legitimate interest
- Consent
- Legal obligation
- Contractual obligation

We collect and use your personal data for legitimate human resources, work-finding, business management, payroll processing and accounting reasons including:

- identifying and evaluating candidates for potential employment, as well as for future roles that may become available;
- recordkeeping in relation to recruiting and hiring;

- ensuring compliance with statutory and legal requirements, including the provision of tax and payroll information to HMRC as well as diversity and inclusion requirements and practices;
- conducting criminal history checks as permitted by applicable law;
- protecting our legal rights to the extent authorized or permitted by law; or
- emergency situations where the health or safety of one or more individuals may be endangered.

We process your personal data for the purposes described above: when we have your consent to do so; when necessary to enter into an employment contract with you; when necessary for us to comply with a legal obligation; or when necessary for the purposes of our legitimate interests as an employer and supplier of employment services.

Legitimate interest

Where the Company has relied on a legitimate interest to process your personal data our legitimate interests are as follows:

- in pursuit of the Company's legitimate business interest in the supply of Agency Workers to third party companies seeking employment services.
- in pursuit of the Company's legitimate business interest in the introduction of work-seekers to third party companies seeking contract or permanent staff.

Recipient/s of data

The Company will process your personal data and/or sensitive personal data with the following recipients:

- **To Our Group Companies**

We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this notice.

- **Our insurers/professional advisers**

We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

- **Our clients/potential employers/partner agencies**

We may disclose your personal data and account data to our clients, potential employers, and our partner agencies insofar as reasonably necessary in relation to potential job vacancies, and

in the process of representing you to employers who may have an appropriate vacancy for you and administering any job placement.

- **Providing your personal data to any third party**

Where we share your personal data with any third party, we will ensure this processing is protected by appropriate safeguards including a suitable data processing agreement with that third party.

- **To comply with legal obligations**

In addition to the specific disclosures of personal data detailed above, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation, or in order to protect your vital interests or the vital interests of another individual.

- **Statutory/contractual requirement**

Your personal data is not required as part of a statutory and/or contractual requirement, and/or a requirement necessary to enter into a contract.

Overseas Transfers

The Company may transfer only the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

Data retention

The Company will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time.

The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

We will retain details of your work history for the purposes of providing employment references. We may also need to retain details of your work history and your suitability to work, including compliance

and training records, for six years following the date you last worked for us, in order to provide a legal defence against possible claims for breach of contract.

Where the Company has obtained your consent to process your personal data, we will do so in line with our retention policy. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal data.

Your rights under GDPR

Please be aware that you have the following data protection rights:

- **The right to access**

You may ask us to give you access to any personal information we hold about you; we will provide you with a copy of the personal information we hold provided your request is not found to be excessive or unjustified, in which case a charge may apply; we will also require appropriate evidence of your identity. We may withhold personal information that you request according to legal constraints.

- **The right to rectification of your personal data;**

You have the right to request that we correct any incomplete or inaccurate data we hold about you.

- **The right to erasure of your personal data in certain circumstances;**

In certain circumstances you may ask us to delete the personal data that we hold about you. For example:

- it is no longer necessary for us to hold your personal data in relation to the purposes for which it was originally collected or otherwise processed;
- you withdraw your consent to any processing for which you gave us explicit consent;
- the processing is for direct marketing purposes;
- you believe we have processed your personal data unlawfully.

However, there are certain general exclusions to the right to erasure, including where processing is necessary in order to exercising the right of freedom of expression and information or for compliance with a legal obligation or for establishing, exercising or defending legal claims.

- **The right to restrict processing of your personal data;**

In certain circumstances you have the right for the processing of your personal data to be restricted. This is the case where: you do not think that the personal data we hold about you is accurate; your data is being processed unlawfully, but you do not want your data to be erased; it

is no longer necessary for us to hold your personal data for the purposes of our processing, but you still require that personal data in relation to a legal claim; and you have objected to processing, and are waiting for that objection to be verified. Where processing has been restricted for one of these reasons, we may continue to store your personal data. However, we will only process it for other reasons: with your consent; in relation to a legal claim; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

- **The right to data portability in certain circumstances;**
- **The right to object to processing of personal data based on public or legitimate interest;**

You can object to us processing your personal data on grounds relating to your particular situation, but only as far as our legal basis for the processing is that it is necessary for: the performance of a task carried out in the public interest, or in the exercise of any official authority vested in us; or the purposes of our legitimate interests or those of a third party. If you make an objection, we will stop processing your personal information unless we are able to: demonstrate compelling legitimate grounds for the processing, and that these legitimate grounds override your interests, rights and freedoms; or the processing is in relation to a legal claim.

- **The right not to be subjected to automated decision making and profiling;**

We do not perform automated data processing.

- **The right to withdraw consent at any time.**

If we have obtained your explicit consent to processing your personal data, you are entitled to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

- **Your right to object to direct marketing**

You may ask us at any time not to process your personal information for marketing purposes. However, usually you will either have agreed in advance to our use of your personal information for marketing purposes, or you will be able to opt out of the use of your personal information for marketing purposes.

Complaints or queries

If you have any questions or complaints regarding this privacy notice or any of the procedures set out in it please contact the Data Protection Officer using the contact information at the top of this notice.

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.