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# Data Protection Policy for Hall Recruitment

#### 1. Introduction

This Data Protection Policy outlines how Hall Recruitment collects, processes, stores, and protects personal data, in compliance with the General Data Protection Regulation (GDPR) and the Irish Data Protection Acts 1988-2003. Hall Recruitment is committed to ensuring that personal data is handled responsibly and transparently, respecting the privacy and rights of all data subjects.

#### 2. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person ('data subject'), such as name, identification number, location data, or any specific factors of identity.
- **Processing:** Any operation performed on personal data, such as collection, storage, modification, retrieval, and deletion.
- **Data Controller:** Hall Recruitment, which determines the purposes and means of processing personal data.
- Data Processor: Any third-party entity that processes personal data on behalf of Hall Recruitment.
- Data Subject: The individual whose personal data is being processed.

### 3. Scope

This policy applies to all personal data collected and processed by Hall Recruitment from:

- Candidates applying for jobs through various platforms including Hall
  Recruitment's job board, Indeed, LinkedIn, Irishjobs.ie, Jobs Ireland and others.
- Clients who engage with Hall Recruitment for recruitment services.
- Employees and third-party service providers.

It covers how personal data is collected, processed, stored, and protected, ensuring compliance with GDPR and other relevant data protection regulations.



#### 4. Legal Basis for Processing Personal Data

Hall Recruitment processes personal data on the following legal bases:

- **Contractual Necessity:** Processing is necessary for fulfilling contracts with clients and candidates.
- **Legitimate Interest:** For recruitment purposes and business operations, Hall Recruitment processes personal data in a way that is expected by the data subject and is of low privacy risk.
- **Consent:** Where necessary, consent is obtained from the data subject for specific processing activities.
- **Legal Obligation:** To comply with applicable laws, including employment laws and immigration regulations.

#### 5. Data Collection and Processing

Hall Recruitment collects and processes personal data through the following:

- Candidate applications received via Hall Recruitment's online job board, Indeed, LinkedIn, Jobs Ireland, and other platforms.
- Data provided during the registration process, including identity documents (e.g., passports, work permits).
- Data shared with clients in candidate profiles (anonymised where necessary), ensuring compliance with GDPR.

Personal data may include:

- Contact details (name, email, phone number)
- Employment history and qualifications
- Identification details (passport, work permits)
- Employment preferences and salary expectations

## 6. Purpose of Data Processing

The personal data collected is processed for the following purposes:

• **Recruitment Activities:** To match candidates with job vacancies that align with their skills and career ambitions.



- **Client Services:** To present the most suitable candidates to clients based on their requirements.
- **Compliance:** To meet legal obligations, including verifying candidates' right to work in Ireland.

#### 7. Data Sharing

Hall Recruitment may share personal data with:

- **Clients:** As part of the recruitment process, client organisations may receive candidate information to assess their suitability for specific roles. Candidate profiles shared with clients are anonymised by removing identifiable details such as names, DOB, and addresses, where appropriate.
- **Service Providers:** Third-party providers, such as payroll processors or IT support, who assist Hall Recruitment in its operations.

In all instances, data sharing is governed by strict contracts ensuring GDPR compliance, and data processors must only act on Hall Recruitment's written instructions.

### 8. Rights of Data Subjects

Data subjects have the following rights concerning their personal data:

- **Right to Access:** Individuals can request a copy of the personal data held about them.
- **Right to Rectification:** Individuals can request corrections to inaccurate or incomplete data.
- Right to Erasure (Right to be Forgotten): Data subjects can request deletion of their personal data when it is no longer necessary for the purposes it was collected.
- **Right to Restriction of Processing:** Under certain conditions, individuals can request a limitation on the processing of their data.
- **Right to Data Portability:** Data subjects can request the transfer of their data to another organisation in a machine-readable format.
- **Right to Object:** Individuals can object to the processing of their personal data, particularly for marketing or profiling purposes.



All requests from data subjects must be submitted in writing, and Hall Recruitment will respond within one month. Candidates can also request access to or the erasure of their data by submitting a request through this link: <u>GDPR Request Personal Data</u>.

#### 9. Data Security

Hall Recruitment implements appropriate technical and organisational measures to protect personal data, including:

- **Data Encryption:** Data stored digitally is encrypted to prevent unauthorised access.
- Access Controls: Only authorised personnel have access to personal data.
- **Data Minimisation:** Hall Recruitment ensures that only the minimum personal data required is processed.
- **Anonymisation:** Candidate profiles shared with clients are anonymised, where appropriate, to protect privacy.

#### 10. Data Retention

Personal data is retained only for as long as necessary for the purposes for which it was collected, in line with Hall Recruitment's data retention policies. Candidate data is reviewed regularly and deleted when no longer required, or when requested by the data subject, unless retention is required by law.

To request your personal data, you can request it from the following link on our website:

https://hallrecruitment.ie/gdpr-request-personal-data/

### 11. Third-Party Data Processors

Hall Recruitment ensures that all third-party service providers acting as data processors comply with GDPR. Contracts with data processors include clauses specifying:

- Processing of personal data only under Hall Recruitment's instructions.
- Implementation of security measures to protect personal data.
- · Procedures for data breaches.



#### 12. Data Breach Response

In the event of a data breach, Hall Recruitment will:

- Notify the Data Protection Commissioner within 72 hours if the breach is likely to result in a risk to the rights and freedoms of individuals.
- Inform affected data subjects without undue delay if the breach is likely to result in a high risk to their rights and freedoms.
- Take immediate steps to mitigate the breach and prevent future occurrences.

### 13. Data Protection Officer (DPO)

Thomas O'Keeffe has been appointed as the Data Protection Officer responsible for overseeing Hall Recruitment's data protection strategy and ensuring GDPR compliance. He can be contacted at:

• Telephone: +353 (01) 633 4040

• Email: thomas@hallrecruitment.ie

### 14. Training and Awareness

All employees at Hall Recruitment receive regular training on data protection laws and best practices. The training ensures that staff understand their responsibilities in handling personal data and maintaining confidentiality.

## 15. Review and Updates

This policy will be reviewed annually or as needed to ensure ongoing compliance with GDPR and any changes in data protection laws.

#### 16. Conclusion

Hall Recruitment is committed to safeguarding personal data and ensuring compliance with <u>GDPR</u>. This Data Protection Policy provides a framework for the responsible management of personal data, ensuring transparency, security, and respect for the privacy rights of all data subjects.