

GDPR and Privacy Policy 2020

Keeping Your Data Safe

MadiganGill are dedicated to ensuring that your personal data is kept safely in accordance with our legal obligations and all best practise standards. Below is our Privacy Policy which outlines

1. The purposes for which we process your personal information
2. Who we share your personal information with

This Privacy Policy also applies to business users who access our website, mobile application.

1 Who is in control?

1.1 It is important that you understand who is responsible for keeping your data safe. We are the “controller” of all personal data collected and used for the purposes of providing our services and for any other purposes set out in this Privacy Policy. This means that we are responsible for deciding how and why your data is used and for ensuring that your data is handled legally and safely.

1.2 We have appointed a Data Controller (DC) who has ultimate responsibility within MadiganGill for making sure your data is treated in accordance with this Privacy Policy and the law. Our DC can be contacted by emailing dataprotection@madigangill.co.uk

For the purposes of the Act and the GDPR, the data controller is

Steve Knight, 10 Dominion Street, Moorgate, London EC2M 2EF

Reference number: ZA461482

2 What data do MadiganGill collect and from where?

2.1 We collect and process personal data through our website registration form, telephone, SMS text messages, ‘WhatsApp’ and email when candidates apply for work through MadiganGill. This data (referred as “Account Data” hereinafter) may include the following:

- 2.1.1 your full name;
- 2.1.2 your gender (if you choose to provide it);
- 2.1.3 your date of birth;
- 2.1.4 your email address;
- 2.1.5 your phone number;
- 2.1.6 your postcode and address (if you choose to provide them);

Service Provider of Choice

MADIGANGILL LTD

Registered company number | 07037354 | Registered address | 10 Dominion Street, London, EC2M 2EF

| Unit F19, Pure offices, Kestrel Court, Harbour Rd, Portishead, Bristol BS20 7AN | Ground Floor C/O Regus 1000 Lakeside Western Road,

Portsmouth, Hampshire, PO6 3EZ | Office 1, Izabella House, 24-26 Regent Place, City Centre,

Birmingham B1 3NJ



2.1.7 your medical history;

2.1.8 your social security details;

2.1.9 your bank details;

2.1.10 your qualifications and employment history;

and

2.1.11 your direct marketing preferences.

2.2 We also collect information that you voluntarily provide to us when you contact us with queries, complaints, comments or praise, or information that you voluntarily post about yourself on our social media public areas of our platform (Voluntary Data).

2.3 We may collect anonymised publicly available information from social networking sites such as Facebook and Twitter, for example likes, shares, tweets and posts about MadiganGill. This information may be used for internal analysis purposes.

3 What do we use your data for?

3.1 It is important that you understand how and why we use the personal data that we collect about you. This section sets out the different purposes for which we process personal data and which types of personal data we need for each purpose.

3.2 Management of Contract Bookings, Issuing of Timesheets and Payments to Candidates

3.2.1 We use your Account Data to set up our contract bookings, issuing timesheets and recording payments made to candidates.

3.2.2 We use your Account Data to contact you with new job recommendations.

3.2.3 We may use your Account Data to enable us to respond to queries, complaints or comments that you have and to make sure that these are appropriately dealt with. The Account Data you provide includes special categories of personal data (such as information about your health or race), you must make sure before you provide this that you are happy for us to use that Account Data for the purposes set out in this Privacy Policy.

3.4 Improving our services

3.4.1 We use Account Data and Behavioural Data to help us monitor, analyse and improve services provided by MadiganGill Limited. We use this data to help us understand which content and services are most interesting and enjoyable for our users and to help us identify errors and test features. This helps us to make sure that we are providing you with the best possible products and services.

3.5 Marketing and advertising

3.5.1 We use Account Data, Behavioural Data and Third-Party Data for marketing and advertising purposes. This can include sending you personalised advertisements that use your first name in the advertisement.

3.6 How we use anonymised data

3.6.1 We use aggregated and anonymised data for certain purposes, such as to help us understand what type of content users like and to share with advertisers so that they know how effective their advertising is. When used for these purposes, this data does not enable you or any other individual user to be identified.

4 How do we use your data for marketing and advertising purposes?

4.1 This section sets out the various different types of marketing and advertising that we carry out and how your data is used for each type of activity.

4.2 Email marketing

4.2.1 We will use your email address to send you email marketing where you have signed up to receive this from us.

4.2.2 You can opt out of receiving marketing emails at any time by either following the instructions to unsubscribe in any of our email marketing communications. It may take up to 48 hours for your change in preference to take effect and the change will not affect any marketing emails which have already been scheduled to be sent in the future.

4.2.3 If you opt out of email marketing, we will still need to send you service communications by email from time to time, such as information about changes to our services.

4.3 Promoting our own services on other platforms

4.3.1 We also promote our own content and features via third party platforms, such as social media sites (Linkedin, Facebook etc.).

4.3.2 This usually works by us posting an update about development within MadiganGill or a new role.

4.3.3 You can opt out of receiving this type of promotion at any time by emailing info@madigangill.co.uk. This request will be processed as quickly as possible; however you may receive promotional emails in the interim.

4.4 Preference centre and opting out

4.4.1 You can manage your advertising preferences at any time by contacting MadiganGill at info@madigangill.co.uk . Clearly define the electronic marketing and advertising you are happy to receive.

4.4.2 We will always respect your preferences but please note that it can take up to 72 hours for changes to your preferences to take effect. This may mean that you see some advertising that you have opted out of for a short time after opting out. Some advertising campaigns are also set up to run for a particular time and we are unable to change these settings once they are set up. If that is the case, we will make sure that you are opted out of future campaigns, but you may continue to see advertising relating to a particular campaign if the campaign is ongoing at the time you have opted out.

4.4.3 If you want to opt out of receiving push notifications, you need to do this through your device settings. Please see the section headed Push notifications above for more information.

4.4.4. We do not sell or rent out personal information to any other organisations.

4.4.5 We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about visitors to Our Site. For example, we may provide our advertisers with an anonymous summary of the demographics of visitors to Our Site or with statistics relating to site usage.

4.4.6 If you do not want us to use your personal information in one or more of the ways mentioned above, please contact dataprotection@madigangill.co.uk.

5 What is our legal basis for using your data?

5.1 Data protection law says that we have to tell you the legal basis that we rely on to process your personal data for the purposes that we have notified to you. This section tells you what that legal basis is in relation to each of the purposes set out above.

5.2 With the exception of email marketing, we process your personal data for all of the purposes identified under What do we use your data for? and How do we use your data for marketing and advertising purposes? above on the basis that it is in our legitimate interests, or the legitimate interests of third parties with whom we share your data, to carry out these activities. Further information about what those interests are is set out below.

Purpose: Managing contracts, timesheets and payments

Operative Contract: To ensure that we can carry out our responsibilities towards Operatives and Clients in relation to the work delivered. These include managing contracts, timesheets, and payments through bank accounts.

Purpose: Improving our services

Legitimate interests: To make sure that we continue to improve our service and provide our users with the best and most effective service possible.

5.3 You have the right to object to us processing your personal data for the purposes set out above. Unless we can show that we have a compelling legitimate reason to continue processing your personal data, we will stop processing it. Remember that you can request to delete your personal account at any time in which case we will fully anonymise your personal data.

5.4 In respect of the use of your email address for email marketing purposes, we process this on the basis that we have your consent to do so. You can withdraw your consent at any time by following the instructions to “unsubscribe” in any email marketing communications.

6 Who do we share your data with?

6.1 We do need to share your personal data with some third parties in some circumstances. This includes where we use third party suppliers to perform various services for us. The third-party suppliers we share your personal data with are as follows:

6.1.1 third party service providers who help us to manage our customer database;

6.1.2 third party service providers who employ our Operatives on building sites; and

6.1.3 third party service providers who process to and from operatives and clients.

6.2 We will also share your personal data with third parties in the following circumstances:

6.2.1 where you have specifically consented to us sharing your data with a particular third party; and

6.2.2 where we are required or permitted to do so by law or to protect or enforce our rights or the rights of any third party.

6.3 We do not transfer or store your personal data outside the European Economic Area (EEA). If we do carry out any further transfers of your data outside the EEA, we will inform you and we will ensure that the recipient provides an adequate level of protection of your personal data.

6.4 You should also be aware that if you choose to share content on social media on our pages via the Facebook and Twitter share buttons on MadiganGill website or otherwise, the relevant social media platform will know what page you are on in order to share that page. The use of that information will be governed by the social media platform’s own privacy policy and clicking the “share” buttons does not result in any other personal data being shared between MadiganGill and the platform.

7 How long do we keep your data for?

7.1 We will keep all your personal data for as long as you use MadiganGill Limited. You can choose at any time to terminate the relationship with MadiganGill Limited. To do so send an email to info@madigangill.co.uk. If you do this, we will anonymise all your Account Data as soon as we can after you have closed your account. All other information about you, such as Behavioural Data, will also be fully anonymised.

7.2 If you do not use our service for a period of two years, we will send you a reminder email. If you do not respond, we will send a further reminder email before deleting your Account Data and anonymising your personal data as set out above.

7.3 We may need to keep your Account Data even after two years of no contact for limited purposes, for example if we need your data in order to respond to any complaints or claims that you make. If this is the case, we will only keep the data for as long as we need to in order to fulfil those purposes.

7.4 We keep information relating to any service errors or interruptions you have experienced for between 15-30 days.

8 What rights do you have?

8.1 You have a number of rights under data protection law. These rights and how you can exercise them are set out in this section. We will normally need to ask you for proof of your identity before we can respond to a request to exercise any of the rights in this section and we may need to ask you for more information, for example to help us to locate the personal data that your request relates to.

8.2 We will respond to any requests to exercise your rights as soon as we can and in any event within one month of receiving your request and any necessary proof of identity or further information. If your request is particularly difficult or complex, or if you have made a large volume of requests, we may take up to three months to respond. If this is the case, we will let you know as soon as we can and explain why we need to take longer to respond.

8.3 A right to access your information

8.3.1 You have a right to ask us to send you a copy of your Account Data and all other personal data that we hold about you (subject to some exceptions). A request to exercise this right is called a “*subject access request*” and must be made in writing to:
dataprotection@madigangill.co.uk

8.4 A right to object to us processing your information

8.4.1 You have a right to object to us processing any personal data that we process where we are relying on legitimate interests as the legal basis of our processing. This includes all of your personal data that we process for all of the purposes set out in this Privacy Policy, with the exception of our use of your email address to send you marketing communications with your consent (but you can withdraw your consent to this at any time).

8.4.2 If we have compelling legitimate grounds to carry on processing your personal data, we will be able to continue to do so. Otherwise, we will cease processing your personal data.

8.4.3 You can exercise this right by emailing dataprotection@madigangill.co.uk

8.5 A right to ask us not to market to you

8.5.1 You can ask us not to send you direct marketing or advertising. You can do this by opting out of the advertising you no longer want to receive contact dataprotection@madigangill.co.uk

8.5.2 Please note that it can take a short time for opt-out requests to take effect. The time taken to opt out of each type of marketing and advertising is detailed at [How do we use your data for marketing and advertising purposes?](#) above.

8.5.3 More information about opting out of marketing and advertising is provided at [How do we use your data for marketing and advertising purposes?](#) above.

8.6 A right to have inaccurate data corrected

8.6.1 You have a right to ask us to correct inaccurate data that we hold about you through email dataprotection@madigangill.co.uk. If we are satisfied that the new data you have provided is accurate, we will correct your personal data as soon as possible.

8.7 A right to have your data erased

8.7.1 You have a right to ask us to delete your personal data in certain circumstances, for example if we have processed your data unlawfully or if we no longer need the data for the purposes set out in this Privacy Policy.

8.7.2 We will fully anonymise any personal data we hold about you when you terminate relationship with us, as set out under [How long do we keep your data for?](#) above. This means that it will no longer identify you and ceases to be "personal data".

8.7.3 If you ask us to delete your personal data, we will fully anonymise your personal data as set out above. If you ask us to delete your personal data but you do not want relationship to end, we may not be able or obliged to comply with this as we will usually need to keep processing your data in a personally identifiable form to keep providing our service to you.

8.7.4 If you would like to make a request to exercise this right, please email dataprotection@madigangill.co.uk. If we are required by law to comply with your request, we will fully anonymise your data so that it is no longer personal data and cannot be used to identify you.

8.8 A right to have processing of your data restricted

8.8.1 You can ask us to restrict processing of your personal data in some circumstances, for example if you think the personal data is inaccurate and we need to verify its accuracy, or if we no longer need the data but you require us to keep it so that you can exercise your own legal rights.

8.8.2 Restricting your personal data means that we only store your personal data and don't carry out any further processing on it unless you consent, or we need to process the data to exercise a legal claim or to protect a third party or the public.

9 How can you contact us?

9.1 If you have any questions or concerns about this Privacy Policy and/or our processing of your personal data, you can get in touch with our Data Protection Officer using: dataprotection@madigangill.co.uk.

10 What if you have a complaint?

10.1 You have a right to complain to the Information Commissioner's Office (ICO), which regulates data protection compliance in the UK, if you are unhappy with how we have processed your personal data.

10.2 You can find out how to do this by visiting www.ico.org.uk (opens in a new window).

11 What if this policy changes?

11.1 We may make changes to this Privacy Policy from time to time. Any changes we make will be posted on this page. We may also notify you by email if significant changes are made.

Signed on behalf of the organisation :



Date : 1st January 2020

Signed by : Danny Madigan

Position : Managing Director

Next Review Date : 1st January 2021