



# Recruiter Privacy Notice

AoC Create Ltd

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## Introduction

This notice (together with our Conditions of Use and any other documents referred to on it) tells you what to expect when AoC Create Ltd uses your personal data.

It does not provide exhaustive detail of all aspects of our collection and use of personal data but we are happy to provide any additional information or explanation needed.

Any requests for this should be sent to [mydata@aojobs.com](mailto:mydata@aojobs.com).

This privacy notice applies to information we collect about:

- visitors to [www.aocjobs.com](http://www.aocjobs.com);
- surveys on the AoC Jobs website;
- people who use our online services e.g. who subscribe to our newsletter or install our applications;
- Registered users and recruiters;

## Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

## Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 25<sup>th</sup> May 2018.

## Who is AoC Create Ltd?

AoC Create Ltd (AoC Create) is a limited company registered in England & Wales No 02952696 and our registered address is:

2-5 Stedham Place, London, WC1A 1HU.

AoC Create provides a range of development and resourcing services for the further education (FE) sector.

One of those services is this website (<http://www.aocjobs.com/>), a dedicated FE job board for the Association of Colleges (AoC).

The website allows job seekers to search and apply for jobs within the FE sector and provides recruiters with an easy and cost-effective way to attract high-quality candidates.

AoC Create is committed to protecting and respecting your privacy.

Our use of personal data on this website is aimed at helping us achieve these aims and to provide both job seekers and recruiters with the best service and experience we can.

## Data Protection Officer

AoC Create Ltd has appointed an internal data protection officer who you can contact if you have any questions or concerns about our personal data policies or practices.

Jim Edwards  
AoC Create Ltd  
2-5 Stedham Place,  
London  
WC1A 1HU.

Email: [mydata@aojobs.com](mailto:mydata@aojobs.com)

## Your Rights

The European Union's General Data Protection Regulation provides you with certain rights. A good explanation of them (in English) is available on the website of our National Privacy Regulator, the [Information Commissioner's Office](#).

In the UK you have rights as an individual under the Data Protection Bill 2018 which you can exercise in relation to the information we hold about you.

You can read more about these rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

### A right to information and access

You have the right to know whether AoC Create Ltd is processing your personal data and to have access to the personal we may have about you.

You may also request information about: the purpose of the processing; the categories of personal data concerned; who we might have shared the data with; what the source of the information was (if you didn't provide it directly to us); and how long it will be stored for.

Reasonable access to your personal data will be provided at no cost upon request made to AoC Create Ltd at [mydata@aojobs.com](mailto:mydata@aojobs.com).

To make sure we do not disclose your information to someone else, we may ask you to provide information to confirm your identity. This may include asking you to provide identification documents.

If access cannot be provided within 30 days, AoC Create Ltd will provide you with a date when the information will be provided.

If for some reason access is denied, AoC Create Ltd will provide an explanation as to why access has been denied.

### A right to correct

You have a right to correct the information we hold about you if it is inaccurate. Where we need to investigate the accuracy of the data, you have the right to request we restrict our use of that data e.g. by temporarily removing your profile/CV from Recruiter's search results.

### A right to erasure

You may request that we erase the data we hold about you; but this is not an absolute right and is subject to exceptions. Where we have a lawful reason to retain your data even when you request we delete it, you have the right to restrict our use of your data to that reason only.

You can delete your account by logging in to your account and selecting the 'Delete your account' option.

### **What happens when you delete your account**

*We will delete your account but may retain some of the information you have provided about the roles you advertised to help inform our research into the services we offer job seekers and recruiters.*

*Your personal information will be removed and replaced with random 16-digit numbers. Your Job postings will no longer be visible to job seekers and you will not be able to see any applications you have received or see how many applications a particular posting received.*

### A right to object to the use of your personal data for direct marketing

There are several ways you can stop direct marketing communications from us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails.

Note: We will retain a copy of that email address on our "master do not send" list in order to comply with your no-contact request.

- Log in into your account, visit the 'Marketing Preferences' area and change your preferences.
- In our apps, you can manage your preferences and opt out from one or all of the different push notifications by visiting the 'Settings' section.

Please note that you may continue to receive communications for a short period while our systems are fully updated. We would also like to point out that we send three forms of email notification one from our Madgex job board platform (Bespoke Candidate Alerts – set up by you based on your jobs search criteria which can be controlled in your account) and two from Mailchimp emails (Our weekly newsletter and our occasional marketing emails about our products, services and offers). For these emails you need to click on the unsubscribe link, however you may continue to

receive the bespoke job alerts that you originally set up. To stop receiving all communications please log in into your account, visit the 'Marketing Preferences' area and change your preferences.

### A right to not be subject to automated decision making

You have the right to object to a decision which has been made solely by automated reasons. Essentially, this right allows you to request that the decision is reviewed by a human. Please contact us if you require any more information on how this right may apply to you.

### A right to data portability

When technically feasible, AoC Create Ltd will—at your request—provide your personal data to you or transmit it directly to another controller in a commonly used, machine readable format e.g. csv.

### A right to complain

You have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how we use your personal data.

In the UK this is the Information Commissioner's Office - [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

## The reasons we can lawfully use your data

We only use your personal data when we have a lawful basis to do so.

Data Protection legislation sets out a number of these, but the ones we most commonly use are:

### Consent

In many situations, we collect and use your personal data with your consent.

### Performance of a Contract

There are situations where we need to use your personal data in order to provide the service you have asked us for (or to allow others to do so on our behalf).

### Legal Obligation

If the law requires us to, we may need to collect and process your data.

### Legitimate interest

We may use your personal data to pursue our legitimate businesses interests in a way which might reasonably be expected as part of running our business as long as it does not materially impact your interests, rights and freedoms.

These legitimate business interests can include:

- enhancing, modifying, personalising or otherwise improving our services and communications for the benefit of our customers and users.
- understanding how people interact with our websites
- determining the effectiveness of our marketing and services.

This can also apply to uses which are in your interests and those of others such as those which

- identify and prevent fraud or other illegal activity
- enhance the security of our network and information systems

You have the right to object to our processing of your personal data for our Legitimate Interests at any time.

In practice this can often be achieved by disabling cookies in your browser and reviewing your communication preferences. Please be aware that doing so may affect the functionality of parts of our website or your overall experience of our services.

Please contact us if you have any further questions about our use of your data in our legitimate interests.

## When do we collect your personal data?

Most of the information we gather from recruiters is related to their company and the roles they advertise but we do gather your personal data when you use the site in a personal capacity and when you provide them to help administer the company's account.

In general terms, we will collect personal data

- When you visit any of our websites;
- When you create an account with us including when you create a job posting;
- When you add details of your employees or colleagues to your company's account;
- When you use your account to track and manage the applications you receive;
- When you engage with us on social media;
- When you download or install one of our apps;



- When you contact us by any means with queries, complaints etc or ask our staff to help you;
- When you choose to complete any surveys we send you.

## What happens if you don't give us your data?

You can enjoy many of our services without giving us your personal data. Much of the information on our website is available to those who do not have an account with us.

However, some personal data is needed so we can supply you with the services and information you have purchased or requested.

## What personal data do we collect, why and how do we use it?

We will make it clear when we collect personal data and will explain what we intend to do with it. e.g. when you create an account the form you use to create a recruiter profile has a link to this Privacy Notice.

Some examples of when we may collect and use your personal data are given in general terms below.

### Contact Information

We collect your name and email address only. This information is required in order to create an account. Your employer may provide this information on your behalf when they create a company account.

#### **How we use it**

We use this information to keep in touch with you and provide the services you have asked us to such as Promoted Roles and CV searches.

We also send communications for the benefit of our customers and users such as routine customer service messages around service downtime etc

We may also use your contact information to send you survey and feedback requests to help improve our services. These messages will not include any promotional content and our legitimate interest to do this is to help make our products or services more relevant to you as an existing user.

### Account Role Information

We allow you to set roles and permissions for the users on your company account. Again, this may be information which has been provided by your employer.

#### **How we use it**

We use this information to enable you to allow members of your staff to manage the roles you have posted and carry out actions on your behalf such as searching CVs. Your employer is responsible for maintaining this list and has the ability to edit and delete information from the Company Management page.

## Financial information

We don't ask for personal bank or payment card details, we only collect company payment details.

### **How we use it**

Typically, payment card information is provided directly by users, via our website, into a PCI/DSS-compliant payment processing service and AoC Create Ltd does not process or store the card information

## Data about your preferences

Your agreement to receive emails from AoC Jobs. We also offer the option to receive information from the Association of Colleges and AoC Create about our wider services.

### **How we use it**

We use this information to provide you with the updates you ask us to such as confirmation that a job posting has received an application. We also use this information in our legitimate business interests to provide you with alerts and notification on our website and apps about events you may be interested in.

## Your contacts with us

Details of your contact with us online, by email, telephone, the postal service or by using one of our apps. Your contact details including social media username(s).

### **How we use it**

To respond to your queries and complaints. We need to use the information we hold about you to respond. We may also keep a record of your contacts with us to inform any future communication with you. We do this on the basis of our contractual obligations to you and our legitimate interests in providing you with a good level of service and understanding how we can improve our service based on your experience.

## The data of children

We only collect the information we need to provide career services to registered job seekers over the age of 18.

We do not attempt to solicit or knowingly receive information from children under 16.

## Technical Data that identifies you, how you use [www.aoc.jobs.com](http://www.aoc.jobs.com) and our applications

Your IP address, login information, browser type and version, session ID, time zone setting, browser plug-in types, geolocation information, operating system and version.

The pages you visit, the path you take through our site, page load times, errors you receive, how long you stay on our pages, what you do on those pages, how often, details of CV searches you carried out, CVs you viewed and downloaded etc

This information is normally gathered using cookies in your web browser. Learn more about our use of [cookies and similar technologies](#).

### **How we use it**

We use this information for a number of purposes related to providing the services you ask us to from login and authentication to remembering your settings.

We also use this information in our legitimate business interests such as improving and personalising our website and online services and to protect our business and your account from fraud and other illegal activities

## Combining the data we hold about you

We want to give you the best possible experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this picture to offer you information about other products and services that are most likely to interest you.

We do this as part of a legitimate interest in understanding our users and providing the highest levels of service as this allows us to tailor your experience and to display the most interesting content to you on our websites or apps.

For example, we might display a list of job seeker profiles which may be of interest to you based on your job postings and CV search activity.

We display these to you on the basis of your consent to receive app notifications and/or for our website to place cookies or similar technology on your device.

## The use of your data for marketing purposes

With your consent, we will use your personal data, preferences and details of your job postings and CV searches to keep you informed by email about relevant products and services including new job seeker profiles, events such as job fairs and so on.

You can withdraw your consent at any time as described earlier in this notice.

## How we protect your personal data

We maintain physical, technical and administrative safeguards to protect your personal data.

Access to your account is password-protected and we secure access to all transactional areas of our websites and apps using SSL encryption meaning that any information you give us through [www.aocjobs.com](http://www.aocjobs.com) remains private and secure.

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

We restrict access to your personal data to those employees who need that information to perform their role and help provide services to you.

Finally, our sub-contractors and employees are contractually bound to keep your personal information secure and confidential in line with this Privacy Policy. We also provide training to ensure they are kept up-to-date on our security and privacy practices.

Please contact us if you have any questions about the security measures we have in place.

## How long will we keep your personal data?

We'll only keep your personal data for as long as is necessary for the purpose for which it was collected and to comply with applicable law or resolve disputes. This means we set retention periods for all the job seeker data we collect.

When that retention period has passed, your data will either be completely deleted in a secure manner or anonymised e.g. by aggregation with other data in a non-identifiable way for statistical analysis and business planning purposes.

Some examples of customer data retention periods:

### Account Information

We keep your account and the information you have provided in your profile for as long as you remain active i.e. log in and use it.

If you have not logged in for 365 days or more, we will send you an email reminding you to log in to keep the account active.

If you do not log in for a further 180 days or more, your profile will be deactivated. This means your profile information will be deleted.

Your account however will remain on our systems. This means we will retain your email, username and password allowing you to log back in and reactivate your account at any time but you will need to rebuild your recruiter profile, create new job postings etc.

You can, as described earlier in this notice, choose to delete your account completely at any time, by logging into your account, going to the privacy section and clicking on "Delete your account."

Alternatively, we can delete your account for you, to start this process, please contact the AoC Jobs team - [enquiries@aocjobs.com](mailto:enquiries@aocjobs.com)

## Who do we share your personal data with?

We do not reveal your personal data to third-parties unless:

- you request or authorise it (e.g. when you agree to receive information from the Association of Colleges)
- the information is provided to comply with the law (for example, to comply with a court order), enforce an agreement we have with you, or to protect our rights, property or safety, or the rights, property or safety of our employees or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- the information is provided to our sub-contractors, agents, vendors or service providers who perform functions on our behalf; or
- to address disputes, claims, or to persons demonstrating legal authority to act on your behalf.

## Examples of the kind of third parties we work with

IT, software and SaaS companies who support our website and other business systems.

These include our CRM provider – Job Adder – and Madgex who provide our online Job Board platform. Both of these companies are data processors for AoC Create Ltd which means they only use your data in order to provide the technical services we ask them to.

Direct email platform companies such as Mailchimp who help us manage our electronic communications with you.

DoubleClick/Facebook/Rubicon Project to show you job seekers whose CVs might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites. See our Cookies Notice for details.

## Sharing your data with third parties for their own purposes:

We will only do this in very specific circumstances, for example:

With your consent, given at the time you supply your personal data, we may pass that data to a third party for their direct marketing purposes.

This will normally be only the Association of Colleges and those companies who offer career related services such as training organisations etc.

We may, from time to time, expand, reduce or sell AoC Create Ltd and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where

relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

To help personalise your experience we currently use the following companies, who will process your personal data as part of their contracts with us:

- DoubleClick
- Google
- Facebook

## Where your personal data may be processed

We always opt to have your data stored in the UK or EU where possible. This includes instances where a vendor offers a choice of storage locations but where the EU option is more expensive.

However, sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA), such as the United States.

AoC Create Ltd transfers personal data outside the EEA only:

1. to countries where there is an adequacy decision in place i.e. the EU has formally determined that there is a sufficient level of protection in place under that nation's data protection laws; or
2. where the recipient is certified under an internationally recognised privacy framework which helps to ensure your protection; or
3. with your consent; or
4. to perform a contract with you; or
5. to perform a contract with another in your interests; or
6. to fulfil a compelling legitimate interest of AoC Create Ltd in a manner that does not outweigh your rights and freedoms.

Any transfer of your personal data will follow applicable laws and we will always treat your personal information in line with the principles of this Privacy Notice.

This includes measures such as imposing contractual obligations on the recipient with respect to how they treat your data.

If you would like more information about how we protect your rights and freedoms when transferring your data outside the EEA, please contact our Data Protection Officer.

## Protecting your data transferred to the United States

Many online services are reliant on US providers and/or servers which means many companies need to transfer your data to the US to provide the services and/or online functionality many people expect.

The United States has neither sought nor received a finding of "adequacy" from the European Union under Article 45 of the GDPR.

The EU-U.S. Privacy Shield Framework was designed by the U.S. Department of Commerce and the European Commission to provide companies on both sides of the Atlantic with a mechanism to comply with data protection requirements when transferring personal data from the European Union and Switzerland to the United States in support of transatlantic commerce.

Membership of the scheme is voluntary but, when choosing an infrastructure partner who transfers your data to the US, we select only those companies who are members of the EU-U.S. Privacy Shield

Along with the contractual and organisational measures we have in place, we believe this helps to ensure your rights and freedoms are protected as the Privacy Shield framework is recognised by the European Union ([although this may be subject to challenge by the European Data Protection Board](#)).