**GFR International Limited Privacy Notice**

GFR International Limited (“GFR”) is an international recruitment firm, sourcing candidates for key clients across the finance sector around the world. GFR also acts to raise funds for charitable entities globally.

We are dedicated to safeguarding and preserving your privacy when visiting our site or communicating with us. This Privacy Policy provides an explanation as to what happens to any personal data that you provide to us, or that we collect from you. This policy is updated from time to time and we recommend you check this page to ensure you are happy with any changes.

1. **GFR International Limited**

GFR is a limited company registered in England with company number 09774780, and address of 152-160 City Road, London, EC1V 2NX.

Our Data Protection Officer is Mr Ian Gray (email address: ian.gray@gfrinternational.com).

1. **What Does This Notice Cover?**This Privacy Information explains how we use your personal data: how it is collected, how it is held,

and how it is processed. It also explains your rights under the law relating to your personal data.

1. **What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

1. **What Are Your Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

* The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
* The right to access the personal data we hold about you. Part 10 will tell you how to do this.
* The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. You can contact us using the details in Part 11 if you would like to find out more.
* The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
* The right to restrict (i.e. prevent) the processing of your personal data.
* The right to object to us using your personal data for a particular purpose or purposes.
* The right to data portability. This means that you can ask for a copy of your personal data to re-use with another service or business in some cases.
* Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office.

1. **What Personal Data Do We Collect?**We typically collect only the information that you supply us whether on your CV, or by other means of communication, or from publicly available sources, for example:

* Internet searches
* Public registers of personal and corporate information
* Newspaper reports, supplements, magazine and journals
* Online candidate databases

This information often contains some or all of the following personal data (this may vary according to your relationship with us):

* Name; date of birth; gender; address; telephone number; employment information, employment history; qualifications; information about your preferences and interests; salary details.

Your personal data is obtained from the information you submit to us when applying for a position that we introduce and from other websites when you reply to a career advertisement we may place on behalf of our clients.

We gather this information to provide recruitment services to clients in the finance sector globally, and to support charities in fundraising, and relevant elements of the information gathered are shared with these organisations.

Information regarded as sensitive data under the Data Protection Act will only be collected where that data has been directly revealed by the individual concerned (for example, in a media interview).

We will hold this data only as long as commercially relevant, which we define as 2 years after completing work with the client.

1. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

* When you make a job application, your personal details are required in order for us to consider you for the role.
* Under our Legitimate Business Interests, we may also use your personal data to contact you to inform you of a job opportunity that might interest you.
* Communicating with you. This may include responding to emails or calls from you.

We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

1. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. In most cases this will be for a period of 2 years before it is refreshed or deleted.

1. **How and Where Do You Store or Transfer My Personal Data?**

Our normal business practice is to store your personal data in the UK, which means that it will be fully protected under the GDPR. We also use an encrypted cloud backup service, which stores your data securely in the USA.

There are occasions when it is necessary to transfer your data outside the EU, for example if you are applying for a position in another country. In these circumstances we will make the location clear, and hence seek your permission to transfer your details and take all reasonable steps to ensure the security of your data.

1. **Do You Share My Personal Data?**

We may share your personal data with other companies for the purpose of providing our service to you, for example we may pass your CV details to our client/s (employers) in order that they may assess your application.

We will not share any of your personal data with any other third parties for any purposes, subject to one important exception:

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law.

1. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

1. **How Do I Contact You?**To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:  
   Email address: ian.gray@gfrinternational.com  
   Telephone number: 44 (0)20 7947 781432  
   Postal Address: GFR International Limited, 152-160 City Road, London EC1V 2NX
2. **Changes to this Privacy Notice**

This Privacy Notice was last updated in May 2018. It may be necessary to change this Privacy Notice from time to time, for example, if the law changes, or if we change our business in a way that affects personal data protection.

The latest Privacy Notice will always be made available upon request.