



## **HALO Trust Operational Privacy Notice**

### **1. Scope**

Our Privacy Notice describes the ways that the HALO Trust (**HALO, the Charity, we**) collects your personal information and governs how we will deal with it.

We aim to ensure that any personal information we obtain and use will always be held, used and transmitted in compliance with the EU General Data Protection Regulations and relevant Data Protection Laws.

Where this Privacy Notice contains hyperlinks to other pages on our website, we recommend you click on those links as they may contain additional important details about our Data Protection Policy. The HALO Trust Data Protection Policy is maintained from our UK headquarters based in the South West of Scotland.

This Privacy Notice applies with immediate effect to all personal information collected either directly from you, through any 3<sup>rd</sup> party or via HALO systems. Personal data, or personal information, means any information about an individual from which that person can be identified directly or indirectly. It does not include data where the identity has been removed (anonymous data).

HALO may occasionally amend this Privacy Notice to reflect regulatory requirements and changes in our information collection and disclosure practices. Any new Privacy Notice will automatically be effective when it is published on the website or issued to you directly. You should therefore visit the website regularly to view our most up to date Privacy Notice. We also advise you to print a copy for your records.

The location of the Privacy Notice will be displayed or hyperlinked to any forms that collect Personal Information.

### **2. Responsibilities**

The HALO GDPR Owner has overall responsibility for ensuring that this notice is applicable, compliant and implemented in accordance with the HALO Data Protection Policy.

All HALO staff who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and that their consent to the processing of their data is secured if required.

### **3. Privacy Notice**

#### **3.1 Who are we?**



The HALO Trust is a charity whose mission is to lead the effort to protect lives and restore livelihoods for those threatened by landmines and the debris of war. We are a registered UK charity and our registration number is 1001813.

As part of our commitment to protecting our employees (both pre, during and post-employment), candidates, suppliers and 3<sup>rd</sup> parties' data, we have implemented a stringent Information Security Management system to protect both the security and integrity of the data we process.

As part of our commitment to managing individuals' rights, we have appointed a GDPR Owner who will work alongside our Head of Safeguarding and Policy, to ensure compliance of all of our Data Protection activities.

Our HALO GDPR Owner can be contacted at

- [dataprotection@halotrust.org](mailto:dataprotection@halotrust.org)
- (01848331100)

### 3.2 Employees (Prospective, existing)

#### What information do we collect?

In the course of your work for us, or in the course of dealing with your job application, we will hold a range of personal data on you, the majority of which you will have provided to us directly.

The personal data we may collect, use, store or transfer about you is detailed below:

Personal data type:	Source	Legal Basis
Contact Name, LinkedIn profile (where public)	LinkedIn profiles (where public)	Legitimate Interest
Contact Data: such as your name, address, telephone number, and email address	Your submitted CV or details via direct communication with our team, the HALO website, and information you have submitted to 3 <sup>rd</sup> party jobsites.	Legitimate Interest / Contract
Employment History and Qualifications: including your current job title, previous experience details of your previous employers, your qualifications	Your submitted CV or details via direct communication with our team, the HALO website, and information you have submitted to 3 <sup>rd</sup> party jobsites.	Legitimate Interest / Contract
Financial Data: including details of your pay and the bank details we use to pay you, insurance contributions, expenses claims, tax information and other types of payments	Information provided by you to us	Legal Obligation / Contract



such as maternity or paternity pay		
Health data: including your health declarations, sickness absence record, health and safety records relating to you, and emergency health information	Information provided by you to us	Legitimate Interest / Contract / <b>Consent</b>
Right to work in the UK or a required region	Information provided by you to us	Legitimate Interest / Contract
Details relating to our Equality and Diversity policies	Information provided by you to us	<b>Consent</b>
IT Systems Data: including navigation and click-stream data, the time of accessing the website, duration of your visit, pages, job vacancies you viewed or searched for, information from cookies or web beacons	Your use of our Website	Legitimate Interest
Your Subject Access Requests	Your written request to us	Legal Obligations
Video and Imagery	CCTV Footage collected for security purposes	Legitimate Interest

It may be necessary for us to collect data which under Data Protection Law is classified as Special Categories of Personal Data. The special category data we may potentially hold about you is usually data about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, and information about your health. We may also hold data about criminal convictions and offences.

It is anticipated that we will only need to collect the following Special Category Data under normal circumstances:

1. Health Data where processing is necessary for us to meet our obligations or exercise our rights in connection with employment, social security, or social protection (for example, where inoculations are required for a regional role or completing insurance details).
2. Equality and Diversity data where processing is necessary for reasons of substantial public interest (including achieving our aim of equality of opportunity and treatment in our workplace). Where possible, this information will be anonymised.



We will only process this information with your consent or when your vital interests are involved.

#### How do we collect your information?

HALO obtains information from you in the following four ways:

##### **A) Personal Interaction**

Most of the data we hold about you is data that you have provided to us directly, including in writing, where you visit our office or have a conversation with one of our staff.

##### **B) Information provided by you through our website**

If you wish to apply for a vacancy with us, we may ask you to submit your personal information (including your contact information and your CV) via our website. We will ask for your consent to send your details out of the European Economic Area, (EEA) should the position be based in a non EEA country.

##### **C) Automatic collection**

Like most websites, our website uses cookies and web beacons to enhance your visitor experience. Please visit our cookie policy for further details. If you want to disable cookies, you will need to change your website browser settings.

##### **D) Information from third parties**

HALO may also obtain information about you directly from third parties, such as 3rd party job boards or via LinkedIn. If we have found your details on LinkedIn or if you have been referred to us, your data will only be retained during the process of establishing your consent for us to contact you.

We may also receive data from previous employers where they are giving references, the relevant tax authorities, any professional associations you are a member of and/or your professional regulator if you are a member of a regulated profession.

Independently of how we collect your data, we will always ensure that you have access to the relevant Privacy Notice.

If we have gathered your information from a 3<sup>rd</sup> Party, we will always seek permission from you to store and process your data.

Additional Terms and Conditions associated with using our website, including our use of cookies, can be found on our website.



### What will we do with your information?

We may process and store your information for the following purposes;

#### **Whilst seeking employment with HALO**

HALO may collect and store your personal information in order to process your job applications, to respond to your enquiries, to get in touch with you about other possible job opportunities and to generally maintain the information you hold with us for our legitimate interest of recruiting the best staff and improving our website. You will be given the opportunity to restrict this use at any time. We will delete all of your data after 6 months if we have not made contact with you.

#### **Whilst employed**

The principal purposes for which we collect and store your personal information are to meet our legal and contractual obligations as an employer, to manage our staff efficiently, to promote high performance, to maintain a safe workplace, and to promote our charitable aims of providing humanitarian aid.

#### **To make an Insurance claim**

HALO may be required to request information from you in order to make an appropriate insurance claim on your behalf.

#### **To assist with HALO publications**

HALO may use images or videos of you carrying out your activities in order to promote our charitable aim of providing humanitarian aid.

### **3.3 Suppliers and Contractors**

#### **What information do we collect?**

The personal information we collect might include contact details and financial information.

If you provide services to HALO, we will collect information in line with your contract for services.

#### **How do we collect your information?**

HALO obtains information from you in three ways:

##### **A) Submissions by you**

Where you submit your details to us as a contact, to enable us to manage a contractual obligation or provide information on our services or your products / services.

##### **B) Automatic collection**

Like most websites, our website uses cookies and web beacons to enhance your visitor experience. Please visit our cookie policy for further details.



### **C) Information from third parties**

HALO may also obtain information about you directly from third parties via LinkedIn, referrals, events, or your own company website. If we have found your details via a third party and we do not require them for contractual purposes, they will only be retained during the process of establishing your consent for us to contact you.

#### What will we do with your information?

We will process and store your information for any or all of the following purposes;

1. To meet our contractual obligations
2. To comply with our legal obligations
3. To procure / assess possible services or products that could lead to a contractual engagement.

#### **Contractual Obligations**

The principal purposes for which we collect and store your personal information are to meet our contractual obligations. In order to carry out our humanitarian aid in an effective, safe and efficient manner we need to ensure that we have the correct communication channels. This is managed through keeping a record of contact positions, email addresses, telephone numbers and business addresses.

#### **New Business Development**

Occasionally, HALO may contact you by telephone or email to inform you of our existing achievements and plans for the future, but will only do so in accordance with your preferences.

If you requested to receive information from us but subsequently change your mind, you can opt out at any time.

#### **Service / Product Procurement**

HALO may retain personal contact information in order to establish a supply chain of services or products to ensure that HALO continues to provide humanitarian aid.

### **3.4 Sharing with 3<sup>rd</sup> Parties**

HALO will not sell your personal information to third parties. However, it may be necessary for us to share personal information with the following third parties for the purposes described above.

<b>3<sup>rd</sup> Party</b>	<b>Data and Purpose</b>
HALO International	HALO operates in countries throughout the world. In order to ensure your safety and employment continuity it is sometimes necessary to supply your information to these countries / programmes. If those countries are not in the EEA, your explicit consent will be sought.



Recruiting and Communications Software	HALO may store or process your data with third parties where it is necessary to process your application for a particular role.
Visa Processors	HALO may be required to submit your details in order to ensure a successful VISA application process.
Insurance Company	HALO will be required to submit your details in order to ensure contractual obligations for insurance purposes.
Travel Agent	HALO will be required to submit your details to make appropriate travel arrangements.
Legal entities	HALO may disclose your personal information where necessary to comply with regulations or law or to assist with law enforcement, to enforce the terms under which you are contracted with HALO or to protect our property and other rights.
3 <sup>rd</sup> Party Recruiter/ Job board	You may have accessed our website via a hyperlink from another job board. Your personal details may be shared between HALO and that 3 <sup>rd</sup> party.

### 3.5 Transferring outside of the European Economic Area (EEA)

Where possible, all data processing will take place within the EEA. HALO will only transfer data outside of the EEA where such transfer is necessary and only in accordance with relevant Data Protection Laws.

Should HALO transfer your data to a HALO Programme other than those within the EEA or the United States (which will be under the Privacy Shield - or further details, see European Commission: EU-US Privacy Shield), we will do so in accordance with Binding Corporate Rules.

Should it not be possible to fully implement Binding Corporate Rules, we will ensure a similar degree of protection is afforded to your data as would be afforded within the EEA by ensuring at least one of the following safeguards is implemented:

- Transfers of data outside the EEA are governed by an agreement that incorporates specific contractual clauses approved by the European Commission which give personal data the same protection it has in Europe.
- The country to which the data is transferred has been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contractual clauses approved by the European Commission which give personal data the same protection it has in Europe.

### 3.6 Consent, Permissions and Contractual Obligations

For the purposes of this Privacy Notice, HALO refers to Consents, Permissions and Contractual Obligations.

The difference between consent and permission can be seen below;

**Consent:** requires a physical record from yourself.

**Permission:** can be granted by you and recorded by a HALO representative.



By submitting your CV, applying for a specific role, or by providing your details, you are giving us **permission** us to retain your details in accordance with this Privacy Notice.

If we have been provided with your details via a 3<sup>rd</sup> party, we will seek your **permission** to process your personal data prior to starting the recruitment process. Should this permission not be granted, upon your request, we shall remove your details from our system.

By allowing HALO to act as your employer, or by entering into a contract with us, you are agreeing to **Contractual Obligations**, which will be implemented in accordance with this Privacy Notice.

Should you request that we refrain from contacting you in the future, we will, with your permission, retain minimal information so that we can record a note of your restrictions.

HALO will seek formal **consent** if data is to be used for processing of EU GDPR defined Special Categories of Personal Data, (i.e. any data associated with Health or our Equality & Diversity Commitment).

Where we are asking you for Special Categories of Personal Data we will always tell you why and how the information will be used.

You may withdraw Consent or Permission at any time by contacting us at [dataprotection@halotrust.org](mailto:dataprotection@halotrust.org)

In the event that you are not already entered into a formal contractual agreement with us, the following consent will be asked when you submit your CV to our website or during our initial engagement.

	YES	NO
I consent to the HALO Trust sending my personal Information out of the European Economic Area, based on the risks shown here. (Required if you are applying for a post out of the European Economic Area)	<input type="checkbox"/>	<input type="checkbox"/>
I Consent to HALO processing a criminal record check, should it be required for the position that I am applying?	<input type="checkbox"/>	<input type="checkbox"/>

### 3.7 Profiling and Automated processing

HALO does not carry out automatic profiling or processing.

### 3.8 Retention period

HALO will process, store and dispose of Personal Data in line with our Document Control Procedure, our Record Retention Procedure and our Information Security Management Manual. A summary of our retention policies can be seen in the table below.

For the purposes of this Privacy Notice the following definitions apply:

Candidate: A job applicant.





**Employee:** An individual who has entered into an employment contract with HALO currently or in the past.

Data Description	When We Collect	Disposal
Prospective Candidate CV, Notes etc.	Upon initial contact, or refreshing / updating.	After 6 months from last contact, or upon request from Candidate
Candidate Contact details, (email, address, telephone number, etc.)	Upon initial contact, or refreshing / updating.	After 6 months from last contact, or upon request from Candidate
Employee Right to Work Records	Whilst verifying Right to Work	6 years after contract ending
References	Upon request	6 years after contract ending
Employee Special Data pertaining to Health Screening	Upon Request	6 years after contract ending
Employee and Candidate Equality & Diversity Information	Online during application process, during interviews, staff interaction	Anonymised and kept on a rolling 6 year cycle.
Employee Financial Details	During contract establishment	Duration of employment

### 3.9 How will we contact you?

We will contact you in the following circumstances;

Circumstance	How	Why
If you submit your details to our website in response to a particular job advertisement.	Telephone or email in the first instance.	To inform you of the status of your application and to further the conversation.
If you submit your details on a speculative basis to our website.	Telephone or email in the first instance.	To further the conversation and to find out more about how we can help you seek work.
If we receive a referral	Telephone, email or social media where appropriate.	To find out if you are happy to be referred, communicate our Privacy Notice and to confirm permissions if appropriate.
If you visit one of our offices and apply for a post.	Telephone or email in the first instance.	To confirm suitability and availability and provide information on relevant assignments.
If we find your details on LinkedIn and think you may be suitable for a current opportunity.	Via LinkedIn, email and telephone where these contact details are public.	To find out if you are happy to be referred to us, to communicate our Privacy Notice and to confirm permissions if appropriate.



If we receive your CV or contact details through a 3 <sup>rd</sup> Party job board / website	Telephone or email in the first instance.	To find out if you are happy to be contacted, to communicate our Privacy Notice and to confirm permissions if appropriate.
If we believe that you can provide products or services that assist HALO	Telephone or email in the first instance.	To request information about services or products or to engage in contract negotiations.
If we require to contact you for contractual reasons.	Telephone or email in the first instance.	To implement a contractual requirement.

### 3.10 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that HALO refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.12 below.

### 3.11 Requesting information on the data we hold

HALO, at your request, can confirm what information we hold about you and how it is processed. This is called a Subject Access Request. If HALO does hold personal data about you, you can request copies of the information we hold from our Head of Policy and Compliance on the contact details at the end of this Notice.

A Subject Access Request form (**SAR02**) can be requested from our GDPR Owner at [dataprotection@halotruster.org](mailto:dataprotection@halotruster.org). Whilst you do not need to complete the SAR02 form to lodge a Subject Access Request, it will make processing easier.

We will need two different forms of identification to show a facial photograph and address, which can be:



- Passport
- Driving licence
- Birth certificate
- Utility bill (from last 3 months)
- Current vehicle registration document
- Bank statement (from last 3 months)

Your request should be emailed to the GDPR Owner at [dataprotection@halotrust.org](mailto:dataprotection@halotrust.org)

We endeavor to respond to your request within 28 days of confirming its validity.

### 3.12 Complaints and contacts

In the event that you wish to make a complaint about how your personal data is being processed by HALO or how your complaint has been handled, you have the right to lodge a complaint directly with the ICO and HALO GDPR owner.

The details for each of these contacts are:

	Supervisory authority contact details	GDPR Owner
<b>Contact Name:</b>	Information Commissioners Office (ICO)	
<b>Address line 1:</b>	Wycliffe House,	
<b>Address line 2:</b>	Water Ln,	
<b>Address line 3:</b>	Wilmslow	
<b>Address line 4:</b>	SK9 5AF	
<b>Address line 5:</b>		
<b>Email:</b>		
<b>Telephone:</b>	0303 123 1113	
<b>Online</b>	<a href="https://ico.org.uk/concerns/handling/">https://ico.org.uk/concerns/handling/</a>	