

# Simply Education Privacy Notice

This document is approved and authorised for application within  
The MCG Group Holdings Ltd and all associated subsidiary  
companies.

Signed  Colm McGinley, CEO

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## Introduction

Simply Education is a recruitment business which provides work-finding services to its clients and work-seekers. Simply Education must process personal data (including sensitive personal data) so that it can provide these services – in doing so, Simply Education acts as a data controller.

You may give your personal details to Simply Education directly, such as on an application or registration form or via our website, or we may collect them from another source such as a job board. Simply Education must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with this privacy statement. At all times we will comply with current data protection laws.

## Collection and use of personal data

### Purpose of processing and legal basis

Simply Education will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients. Simply Education also processes personal data for applicants for internal job vacancies.

If you have opted-in we may also send you marketing information and news via email/ text. You can opt-out from receiving these at any time by clicking “unsubscribe” or contacting us directly when you receive these communications from us.

In some cases, we may be required to use your data for the purpose of investigating safeguarding allegations, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

- Legitimate interest will be relied on during the registration process up until the worker seeker is met for the final face to face interview.
- Consent will be relied on from the point of the final face to face interview and to process any sensitive data for any work seekers
- Legitimate will be relied on during the recruitment process for internal job applicants
- Legal obligation will be relied on where processing is necessary to comply with Employment law, Conduct of Employment Agencies and Employment Businesses Regulations 2003, HMRC and associated national minimum wage, social security and tax legislation and any other statutory guidance relevant to our industry

### Legitimate interest

This is where Simply Education has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where Simply Education has relied on a legitimate interest to process your personal data our legitimate interests are as follows:

- Managing our database and keeping work-seeker records up to date;
- Providing work-finding services to you and our clients;
- Contacting you to seek your consent where we need it;
- Giving you information about similar products or services that you have used from us recently;
- Managing the recruitment process of internal job applicants

## Statutory/contractual requirement

Simply Education has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements.) Our clients may also require this personal data, and/or we may need your data to enter into a contract with you. If you do not give us personal data we need to collect we may not be able to continue to provide work-finding services to you.

## Recipient/s of data

Simply Education will process your personal data and/or sensitive personal data with the following recipients:

- Clients (whom we may introduce or supply you to)
- Former employers whom we may seek references from
- Prospective employers when providing employment references
- Payroll service providers who manage payroll on our behalf or other payment intermediaries whom we may introduce work seekers to
- The Recruitment and Employment Confederation
- ACM in connection with ISO auditing
- Legal Advisers working on behalf of Simply Education Ltd
- The Disclosure and Barring Service
- Access Personal Checking Services Ltd (APCS)
- The Teaching Regulations Agency
- Government, law enforcement agencies and other regulators e.g the Police, Home Office, HMRC, Employment Agencies Standards Inspectorate (EASI), Local Authority Designated Officers (LADOs), GLAA,

## Information to be provided when data collected not from the data subject

### Categories of data

Simply Education collects and processes a range of personal data about you this includes:

- Personal data: Full name including any previous surnames
- Photo
- Date of birth
- Contact details, including telephone numbers, email address and postal address
- Copies of proof of address documents including but limited to Bank Statements, Utility Bills, Mortgage Statements and HMRC Documents
- Experience, training and qualifications
- Passport
- Driving Licence
- Birth Certificate
- Change of Name Documents
- Information obtained from the TRA (where applicable)
- CV
- Documents containing proof of National Insurance number
- Information regarding right to work in the UK
- Obtaining, providing and verification of references
- Payroll information
- Information regarding your next of kin or emergency contact
- Records of any CPD observations carried out via Simply Education

#### Sensitive personal data:

- Disability/health condition relevant to the role
- Criminal convictions, including DBS, DBS Update Service, overseas police clearances (where applicable) and Children's Barred List checks

#### Source of the personal data

Simply Education sourced your personal data/sensitive personal data from:

- During registration
- A Job Board
- A recruitment outsource processor
- A Referral
- Cookies listed in section 7

This information did not come from a publicly accessible source.

#### Overseas Transfers

Simply Education may transfer the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

#### Data retention

Simply Education will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time. For example, the Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation. This is currently 3 to 6 years.

Where Simply Education has obtained your consent to process your personal and sensitive personal we will do so in line with our retention policy. Upon expiry of that period Simply Education will seek further consent from you. Where consent is not granted Simply Education will cease to process your personal and sensitive personal data.

#### Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data Simply Education processes on you;
- The right of access to the personal data Simply Education processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to Simply Education processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by emailing [compliancequeries@themcgggroup.com](mailto:compliancequeries@themcgggroup.com) to the Data Protection Officer. Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where we will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.

If you believe that any of your data that Simply Education processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

## Cookies

We may obtain data about you from cookies. These are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies also enable us to deliver more personalised content.

The table below explains the cookies we use and why.

Name of Cookie	Purpose	Strictly Necessary
EU Cookie Compliance	To ensure you agree with our cookie compliance	Yes
_ceg.s, _ceg.u,_ga,_gat,_gid	For Analytics	Yes
PHPSESSID	Session ID	Yes
referred	To recognise where your ip is located	No

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, please contact our marketing department. Please note that in a few cases some of our website features may not function if you remove cookies from your browser.

## Google Analytics

Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

The analytics service(s) used by Our Site use(s) Cookies to gather the required information.

The analytics service(s) used by Our Site use(s) the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
_ceg.s	Third Party	Google	Google Analytics
_ceg.us	Third Party	Google	Google Analytics
_ga	Third Party	Google	Google Analytics
_gid	Third Party	Google	Google Analytics
IDE	Third Party	Google	Google Analytics

## Log Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

## Facebook Pixel

We use Facebook Pixel on our website. Facebook Pixel is a tracking code which allows us to track and monitor the success of advertisements we use on Facebook and to improve the effectiveness of those advertisements by recording information such as the device you used to access our website and the actions you took on our website using cookies. Facebook aggregates data gathered from our use of Facebook Pixel on our website with data it gathers from other sources, in order to improve and target advertisements displayed on its website or via its services, to improve its systems and to provide measurement services to third parties which use Facebook's advertising services. You can find out more at [Facebook Privacy](#).

## Links to external websites

Simply Education's website may contain links to other external websites. Please be aware that Simply Education is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by our website.

## Sale of business

If Simply Education is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

## Data Security

Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data collected through our Site. Steps we take to secure and protect your personal data include: Limiting access to our site, use of passwords and forced password changes and SSL encryption

Only employees who need the information to perform a specific job (for example, consultants, administrators our accounts clerk or a marketing assistant) are granted access to your information.

Simply Education uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/ the internet.

If you share a device with others we recommend that you do not select the "remember my details" function when that option is offered.

If you have any questions about the security for our website, please email:

[compliancequeries@themcggroup.com](mailto:compliancequeries@themcggroup.com)

## Changes to this privacy statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.

## Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact:

Company Data Protection Officer: Lulu Press

Email Address: [compliancequeries@themcggroup.com](mailto:compliancequeries@themcggroup.com)

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.