

Spark Privacy Policy:

Should you wish to contact us with regards to data protection or this privacy policy, please use the contact information on our web site at www.spark.co.uk

1) If an individual contacts us to request a copy of their data that is held by us, we will first ask for proof that they are that person (or proof that they are acting on behalf of the person in question) & then provide a copy of all relevant data within a maximum of 30 days. No fee shall be charged to the individual for this, though we reserve the right to charge a reasonable fee to our client (where applicable) to cover the time involved in meeting the request.

2) For any personal data that we store or process on behalf of a client:

a) When we pass data to another processor on the request of our client (the data controller) it is up to our client to ensure that the other processor handles the data in a way that complies with the law.

b) We will inform that client of any changes to the way we store or process that data (including passing data to any third parties), thereby giving our client (as the controller of the data) opportunity to object to such changes. We shall also update the client's privacy policy to reflect any such changes.

3) We will never transfer personal data to a country outside the EU and the UK unless required to do so by law.

4) If a client that we hold personal data for leaves us (becomes an ex-client), we will erase all associated personal data within a maximum of 90 days of the client leaving us, unless there is an overriding legal reason for us to keep such data. We will keep this for a minimum of 60 days to ensure stability for our ex-client (in case something goes wrong for them on their new platform, or in case they decide to reinstate the service with us), unless specifically requested to erase it earlier by the client in question.

5) If you have any reason for complaint in regards to how we handle personal data please contact us immediately. You also have the right to complain to the Information Commissioners Office.

6) Changes to this Privacy Policy: We may update this Privacy Policy from time to time. If we make significant changes we will let you know but please regularly check this policy to ensure you are aware of the most updated version.

This Privacy Policy was last updated on 22nd May 2018

Personal data (as defined by GDPR) that we hold as a data controller (for our own purposes, not on behalf of clients):

When we store/process personal data	What data we store/process	The purpose(s) of storing/processing this data ("The purpose")	Categories of recipients that we may disclose this data to and the	Time limits	Consequences of revoking permission for us to store/process this data or failing to provide the data
-------------------------------------	----------------------------	--	--	-------------	--

			purpose of such disclosure		
If you are employed by us	Your name, address, contact information, emergency contact information, tax information (including tax codes, etc.), salary details, pension details, details of sick pay, maternity pay and similar, details of sick days, student loan details and any other similar information that becomes necessary to store either by law or in order to be a responsible employer.	<ul style="list-style-type: none"> - To form the basis of employment. - To be able to pay you. - To comply with all relevant employment and tax law. - To help to prevent and/or support claims in any future legal disputes. - To allow us to consider whether to re-employ you in the future. 	<p>Our accountants (to allow us to fulfil “the purpose”).</p> <p>Our accounts software provider (to allow us to fulfil “the purpose”).</p>	We plan to keep this data for as long as is necessary in order to ensure we can continue to fulfil the items listed in “The purpose” column.	<p>If you are currently employed by us, we are legally obliged to store almost all of the data that we do. If there is something specific that you wish not to be stored or processed please talk to a Director about this and we will try to help.</p> <p>If you were previously employed by us, and we erase data about you at your request, this may affect any decision as to whether to re-employ you again in the future. Please note that we may still not be able to erase your data for legal reasons.</p>
If you apply for a job vacancy with us	Any information you supply to us, including a copy of your CV and any other supporting documents.	<ul style="list-style-type: none"> - To assist in making a decision as to whether to employ you. - With your express permission, in order to let you know about future job vacancies that you may be suitable for. - In order to validate any information that you may supply to us in the future if you apply for a job again. 	N/A	We will keep this information for a maximum of 10 years, but we are likely to erase it before then if we don't believe we need it in order to fulfil “The purpose”.	Initially we would not be able to offer you a job. If we had already declined to offer you employment, there would be no consequences to you.