

CONSULTANT PRIVACY NOTICE



1. Statement and Purpose of Policy

Cobras AP collects and processes personal data relating to its consultants in order to manage its relationship with them. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

2. What Information Do We Collect?

We collect and process a range of information about you, including but not limited to:

- Your name, address, and contact details, including email and telephone number
- Terms and conditions of your engagement as a consultant
- Details of qualifications, skills, experience, and career history (including start and end dates)
- Information about remuneration, including services provided, days, and hours worked
- Bank account details (and VAT registration if relevant)
- Duration of any periods during which you are unable to provide services
- Details of insurance contracts maintained and payment of premiums
- Emergency contact details
- Photographs and videos

Data is collected through CVs, forms completed at or during engagement, correspondence, interviews, or meetings. Data is stored in HR systems and other IT systems, including email.

3. Why Do We Process Personal Data?

We process your data to:

- Enter into and manage your consultancy engagement
- Provide consultancy agreements and payment in line with contract terms
- Offer engagements to appropriate, qualified individuals
- Maintain accurate HR records and emergency contacts
- Manage workforce hours effectively
- Support HR and business administration
- Ensure health and safety compliance
- Respond to and defend against legal claims



Where we rely on legitimate interests for processing, we have assessed that your rights and freedoms are not overridden.

4. Special Category Data

We process sensitive data (e.g., health information) only with your explicit consent, which can be withdrawn anytime by contacting HR or your primary contact. Providing such data is voluntary with no negative consequences.

5. Who Has Access to Data?

Your data is shared internally with HR, finance, your primary contact, relevant managers, and IT staff (when necessary). We also share data with third parties for payment processing.

We may disclose your data to:

- Protect our rights or respond to public, regulatory, or law enforcement requests
 - Prospective buyers or sellers if we sell part or all of our business
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6. Choice

Currently, we only share your data with service providers acting on our behalf. If this changes, you will be given the opportunity to opt out before your data is disclosed to any non-service provider third parties or used for new purposes.

7. How Do We Protect Data?

We maintain internal policies and controls to protect your data from loss, misuse, unauthorized access, or disclosure. Third parties processing data for us are bound by confidentiality and must apply appropriate security measures.

8. Data Retention

Your personal data will be retained during your consultancy engagement. Post-engagement retention periods are detailed in our Information Security Policy, available from HR or the Data Protection Officer.



9. Your Rights

As a data subject, you may:

- Access and obtain a copy of your data
- Request correction of inaccurate or incomplete data
- Request deletion or cessation of processing when data is no longer necessary
- Object to processing based on legitimate interests
- Request a temporary halt on processing if data is disputed or inaccurate

To exercise these rights, contact HR or your primary contact.

10. Complaint Resolution

If you believe your data rights have been breached, you may file a complaint with the UK Information Commissioner's Office (ICO): <https://ico.org.uk/make-a-complaint/>

We encourage you to raise concerns with us first by contacting:
info@cbrasap.co.uk

11. What If You Do Not Provide Personal Data?

You must provide certain data required under your engagement, such as periods of unavailability and insurance details. Failure to provide required data (e.g., contact or payment details) will limit our ability to manage your engagement effectively.

12. Changes to This Privacy Notice

We may update this Privacy Notice as required by law or business needs. We will notify you of substantial changes and may communicate updates through other channels.

Last reviewed: June 2025

