

---

## PRIVACY POLICY

---

### BACKGROUND:

Courtney Resources LTD understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, [www.courtneyresources.com](http://www.courtneyresources.com) (“Our Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

|               |   |
|---------------|---|
| “Account”     | means an account required to access and/or use certain areas and features of Our Site;  |
| “Cookie”      | means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 14, below; and |
| [“Cookie Law” | means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;]   |

### 2. Information About Us

Our Site is owned and operated by Courtney Resources LTD, a limited company [registered in England under company number 12898898].

[Registered address: 1<sup>st</sup> Floor, 67 Church Road, Hove, East Sussex, England, BN3 2BD.]

[Main trading address: 1 Victoria Terrace, Hove, BN3 2WB.]

### 3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### 4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) 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 it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

### 5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This

Privacy Policy 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 15.

- b) The right to access the personal data we hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 15 to find out more.
- d) 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 hold. Please contact us using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way on our site.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

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. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 15.

## 6. What Data Do You Collect and How?

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table.

Please also see Part 14 for more information about our use of Cookies and similar technologies and our Cookie Policy for [www.courtneyresources.com](http://www.courtneyresources.com). We do collect 'sensitive' personal data relating to criminal convictions and/or offences once fully registered with us, not for browsing use on our website.

| Data Collected  | How We Collect the Data   |
|---|---|
| Identity Information including: Name, Date of Birth, Gender and NI Number.    | We collect this information upon registration to our services and if you are to sign up to any subscriptions with us. |
| Contact information including: postal address, email address, contact number. | We collect this information upon registration to our services and if you are to sign up to any email                  |

|   |  |
|---|--|
|   | subscriptions with us.   |
| Business information including: Previous and Current employer, job title, industry etc.             | We collect this information upon registration to our services and if you are to sign up to any subscriptions with us.  |
| Technical information including: Browser type and version, operating system.                        | Please refer to the types of cookies we use, technical information would be for use of strictly necessary cookies, performance cookies and functionality cookies.  |
| Data from third parties including: technical information, contact information, profile information. | Please refer to cookies use in section Advertising cookies when you visit another site from a link on our website.   |
| Data from third-party clients, agents, outsourcing reference agencies.                              | Upon our work services in providing work seeking support, we will pass on data to third party clients, agents or/and outsourcing agencies with your permission, upon job offer and/or job seeking stage once fully registered with us. |

## 7. How Do You Use My Personal Data?

[With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email **AND/OR** telephone **AND/OR** text message **AND/OR** post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.] We will always obtain your express opt-in consent before sharing your personal data with third parties in written form for marketing purposes and you will be able to opt-out at any time by formally letting us know in writing.]

Third Parties (including social media sites such as Facebook, LinkedIn, Twitter, Instagram) whose content appears on Our Site may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that we do not control the activities of such third parties, nor the data that they collect and use themselves, and we advise you to check the privacy policies of any such third parties.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 15.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 8. 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.

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

We will only store or transfer your personal data within the UK. This means that it will be fully protected under the Data Protection Legislation.

The security of your personal data is essential to us and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so, we will act as required if an incident was occurred.

## 10. **Do You Share My Personal Data?**

We may share your personal data with other companies in our group for work-seeking purposes suitable to our business industry for recruitment needs. We may sometimes contract with third parties to supply certain services, referencing and DBS agents, clients and outsourcing agents etc.

If any of your personal data is shared with 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, as described above in Part 9.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

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.

## 11. **How Can I Control My Personal Data?**

11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by letting us know directing via email in writing, [info@courtneyresources.com](mailto:info@courtneyresources.com) if this is the case.

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 12. **Can I Withhold Information?**

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Part 14 and our Cookie Policy below.

**13. 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 15.

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 in any case, no more 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.

**14. How Do You Use Cookies?**

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is always protected and respected.

By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Third-party Cookies are used on Our Site for third-party supplier intentions or associations. For more details, please refer to the table below. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

| Name of Cookie             | Purpose   | Strictly Necessary                    |
|----------------------------|---|---------------------------------------|
| Strictly Necessary Cookies | These cookies allow you to browse our website and use the features and functions – i.e. registering with us, job alert subscriptions etc will not be able to be provided otherwise. These types of cookies are essential for the above. | Our site uses these types of cookies. |

|                       |   |  |
|-----------------------|---|--|
| Performance Cookies   | These types of cookies gather information about how visitors go about using the website, for example it will allow us to know what pages are visited the most and any errors that are occurring to be fixed. These specific cookies do not collect information specific to the visitor, they are only for used to see how we can improve our website.   | By using our website and/or our online services, you consent that we can place these types of cookies on your device.  |
| Functionality Cookies | These types of cookies permit the website to remember decisions you have made such as usernames, passwords and allow you to provide other enhanced personal features. In addition, these cookies can remember any changes you have made to font sizes, or any customisations you have made. If you have clicked to watch a video or wanted to make a comment, they may also pop up to request to use the service. These cookies are only for this website and can not track your activity on other websites, the information collected is anonymous.  | By utilizing our website and online services, you permit that we can place these types of cookies on your device.  |
| Advertising Cookies   | These types of cookies are used to provide adverts more relevant to you and your interests. They can be used to limit the number of times you see an advert. The cookies remember that you have visited a website and the information is shared with other suppliers or organisations such as advertisers. Most of the time, these types of cookies will be linked to site functionality offered by the other organisations. As well as the above, we have other clickable links to other websites from our website, once you access another site through a clickable link, we have provided it is the accountability of that site to provide you information as to how they use cookies on their websites. We do use social media channels such as LinkedIn and Twitter. | To find out more about these types of cookies please research upon Google for the information, or on the relevant social media/ other website providers for their cookie policies. |

The following first-party Cookies may be placed on your computer or device:

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings. It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

Our Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve our services. By using Our Site you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Third-party Cookies are used on Our Site for third party suppliers who may also set cookies on our website, for example LinkedIn, Twitter, Google. The third party suppliers are accountable for the cookies they set on our site. If you would like further information about this, please go to the website for the relevant third-party. For more details, please refer to our Cookie Policy at [www.courtneyresources.com](http://www.courtneyresources.com) .

15. **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: [info@courtneyresources.com](mailto:info@courtneyresources.com) .

Telephone number: 07305 080441.

Postal Address: Courtney Resources LTD, 1 Victoria Terrace, Hove, BN3 2WB.

16. **Changes to this Privacy Policy**

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

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date. This Privacy Policy was last updated on 17<sup>th</sup> November 2020.