

COOKABURRA STANDARDS OF CONDUCT POLICY

1. Introduction

- 1.1. This Standards of Conduct Policy ("Policy") sets forth the expectations for all employees and contractors ("Personnel") of Cookaburra Hospitality Recruitment Agency ("Agency") regarding their conduct, interactions, and responsibilities.
- 1.2. This Policy applies to all Personnel of the Agency and serves as a guiding framework for maintaining professionalism, integrity, and ethical behavior in all aspects of their work.

2. Professionalism

- 2.1. Personnel are required to uphold a standard of professionalism in all their activities related to the Agency, including but not limited to dress code, communication, and interactions with clients, candidates, and colleagues.
- 2.2. Respect for individuals, regardless of their background, race, gender, sexual orientation, religion, or any other characteristic, is essential to maintaining a professional work environment.

3. Integrity and Ethics

- 3.1. Personnel must conduct themselves with honesty, transparency, and integrity in all dealings related to the Agency. Providing truthful and accurate information to clients, candidates, and colleagues is paramount.
- 3.2. Confidentiality of sensitive information obtained during the recruitment process, including personal details of candidates and proprietary information of clients, must be maintained at all times.
- 3.3. Conflicts of interest must be disclosed promptly and managed appropriately to prevent any perception of impropriety.

4. Compliance with Laws and Regulations

- 4.1. Personnel are obligated to comply with all applicable laws, regulations, and industry standards governing recruitment practices, employment, and data protection.
- 4.2. Any instances of non-compliance with legal or regulatory requirements must be reported promptly to the appropriate authorities within the Agency.

5. Client and Candidate Relations

- 5.1. Personnel are expected to treat clients and candidates with courtesy, professionalism, and respect throughout the recruitment process.
- 5.2. Discrimination or harassment of any kind, whether directed towards clients, candidates, or colleagues, will not be tolerated and may result in disciplinary action.

6. Confidentiality and Data Protection

- 6.1. Personal data collected from clients and candidates must be handled in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR) in the UK.
- 6.2. Information shared with third parties must be done with the appropriate consent and in compliance with relevant privacy policies.

7. Conflict Resolution

- 7.1. Disputes or conflicts arising between Personnel, clients, or candidates should be resolved through open communication, constructive dialogue, and a commitment to finding mutually beneficial solutions.
- 7.2. Any concerns regarding breaches of this Policy should be reported to management promptly for investigation and resolution.

8. Training and Education

8.1. Personnel will receive ongoing training and education on relevant laws, regulations, industry standards, and best practices to ensure compliance and professional development.

9. Enforcement

- 9.1. Violations of this Standards of Conduct Policy may result in disciplinary action, up to and including termination of employment or contract.
- 9.2. The Agency reserves the right to update or amend this Policy as necessary to reflect changes in laws, regulations, or business practices.

10. Conclusion

- 10.1. By adhering to the principles outlined in this Policy, Personnel demonstrate their commitment to upholding the reputation and integrity of Cookaburra Hospitality Recruitment Agency.
- 10.2. This document constitutes the Standards of Conduct Policy of Cookaburra Hospitality Recruitment Agency and is effective as of the date of adoption.
- 10.3. This Policy shall be distributed to all Personnel of Cookaburra Hospitality Recruitment Agency and made readily available for reference.



COOKABURRA DATA PROTECTION POLICY

1. Introduction

- 1.1 Cookaburra Hospitality Recruitment Agency
 (hereinafter referred to as "the Agency") is committed to
 protecting the personal data of its staff, job-seekers, and
 clients in accordance with the Data Protection Act 1998.
- 1.2 This Data Protection Policy outlines the principles and procedures governing the collection, processing, and storage of personal data by the Agency.
- 2. Purpose of Data Processing
- 2.1 The Agency processes personal data for the following purposes:
- a) Staff Administration
- b) Advertising, Marketing, and Public Relations
- c) Accounts and Records
- d) Administration and Processing of job-seekers' personal data for work-finding services
- 3. Principles of Data Protection
- 3.1 The Agency shall adhere to the following principles of data protection:
- a) Fair and lawful processing
- b) Limited purposes
- c) Adequacy, relevance, and non-excessiveness
- d) Accuracy and currency
- e) Limited retention
- f) Compliance with data subjects' rights
- g) Security safeguards
- Restrictions on international transfers.
- 4. Definition of Personal Data
- 4.1 "Personal data" refers to any information relating to an identified or identifiable individual, as defined by the Data Protection Act 1998.
- 5. Sensitive Personal Data
- 5.1 Certain categories of data, including but not limited to health information, racial or ethnic origins, and political opinions, are considered sensitive personal data and shall be processed with explicit consent.

6. Security Measures

- 6.1 Only authorized personnel designated in the appendix are permitted to access, modify, or delete data from the Agency's database.
- 6.2 All employees shall ensure the implementation of adequate security measures to protect personal data from unauthorized access, disclosure, or alteration.
- 7. Disciplinary Actions
- 7.1 Breaches of this Data Protection Policy shall be considered disciplinary offenses and may result in disciplinary action, up to and including termination of employment.
- 8. Access to Data
- 8.1 Data subjects have the right to access their personal data upon request and payment of a fee. All requests for data access shall be directed to the Data Protection Officer listed in the appendix.
- 9. Handling of References
- 9.1 Requests for access to references from third parties shall be handled cautiously and in accordance with the Data Protection Act 1998.
- 10. Human Rights Act 1998
- 10.1 The Agency acknowledges and respects the rights of individuals as outlined in the Human Rights Act 1998, including the right to privacy and freedom from discrimination.
- 11. Conclusion
- 11.1 This Data Protection Policy constitutes a legally binding agreement between the Agency and its employees, jobseckers, and clients regarding the processing and protection of personal data.



COOKABURRA PRIVACY POLICY

Cookaburra Ltd is committed to protecting the privacy 4. Information Sharing: of our clients, candidates, and website visitors. This Privacy Policy outlines how we collect, use, disclose, and protect your personal information.

1. Information We Collect:

- Personal Information: We may collect personal information such as your name, contact details. resume/CV, employment history, right to work documentation, BPR (Biometric Passport Rules) data, National Insurance number, passport details, and other relevant details necessary for recruitment purposes.
- Usage Information: We may collect information about your interactions with our website, such as your IP address, browser type, pages visited, and other usage data.
- 2. How We Get Your Personal Information and Why We Have It:
- Directly from You: We may obtain personal information directly from you when you apply for a job vacancy, submit your resume/CV, or communicate with us through our website or other channels.
- •From Third Parties: We may receive personal information from third-party sources, such as references provided by former employers or background screening agencies.
- •Legitimate Interests: We collect and process personal information to fulfil our legitimate interests in conducting recruitment activities, assessing candidate suitability for job vacancies, and complying with legal obligations.

3. How We Use Your Information:

- •Recruitment Purposes: We use your personal information to assess your suitability for job vacancies, verify your right to work, comply with BPR regulations, facilitate the recruitment process, and ensure legal compliance.
- Website Improvement: We use usage information to analyse trends, administer our website, and improve user experience.

- •Third-Party Service Providers: We may share your personal information with trusted third-party service providers who assist us in conducting our business operations, such as IT support, background screening, and payment processing.
- •Legal Compliance: We may disclose your personal information when required by law or in response to lawful requests from government authorities.

5. Data Security:

- •We employ industry-standard security measures to protect your personal information from unauthorised access, disclosure, alteration, or destruction.
- ·Despite our efforts, no data transmission over the internet or electronic storage method is 100% secure, and we cannot guarantee absolute security.

6. ICO Registration and GDPR Compliance:

- Cookaburra Ltd is registered with the Information Commissioner's Office (ICO) and complies with the General Data Protection Regulation (GDPR) and other relevant data protection laws and regulations.
- 7. Conditions for Processing and Data Retention:
- We process personal information only when necessary for the purposes outlined in this Privacy Policy and with the consent of the individual concerned.
- We retain personal information for as long as necessary to fulfil the purposes outlined in this Privacy Policy or as required by law. The retention period may vary depending on the nature of the information and legal requirements, but generally aligns with most insurance company policies.

- 8. Your Data Protection Rights
- Under data protection law, you have rights including:
- Your right of access You have the right to ask us for copies of your personal information.
- Your right to rectification You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- · Your right to erasure You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing You have the right Effective Date: 26/02/2024 to object to the processing of your personal information in certain circumstances.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

9.How to complain

- ·If you have any concerns about our use of your personal information, you can make a complaint to us at [Insert your organisation's contact details for data protection queries].
- You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113 ICO website: https://www.ico.org.uk 10. Changes to this Privacy Policy:

 We reserve the right to update or modify this Privacy Policy at any time without prior notice. We encourage you to review this Privacy Policy periodically for any changes.

11. Contact Us:

· If you have any questions or concerns about our Privacy Policy or our data practices, please contact us at:

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