



THE JOB OFFICE LTD

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Privacy & Data Protection Policy

UK GDPR and Data Protection Act 2018 | Recruitment Services

Company	The Job Office Ltd
Registered office	109 Barrowby Road, Grantham, Lincolnshire NG31 8AE
Company number	5148184
Data protection contact	Nicola Rafferty, Director nicky@thejoboffice.com 07969 620324
Document	Privacy & Data Protection Policy / Privacy Notice
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1. Purpose and scope

The Job Office Ltd (the “Company”, “we”, “us” or “our”) provides recruitment and work-finding services to candidates and clients. In delivering these services we process personal information and normally act as a data controller. This notice explains what information we collect, why we use it, where it may come from, who we may share it with, how long we keep it and the rights available to individuals.

This policy applies principally to candidates, prospective candidates, client contacts, prospective client contacts and other individuals whose information is processed in connection with our recruitment activities.

2. Personal information we may collect

- Identity and contact information, such as name, address, telephone number and email address.
- Career information, including CVs, employment history, qualifications, skills, professional profiles, salary/remuneration expectations and role preferences.
- Recruitment records, including applications, communications, interview information, candidate notes, availability, introductions and placement history.
- Client and business-contact information relevant to providing recruitment services and maintaining professional relationships.
- Compliance or verification information where needed for a role or legal obligation.
- Special category or criminal-offence information only where it is necessary, lawful and appropriately safeguarded.

We apply data-minimisation principles and aim to collect only information that is adequate, relevant and necessary for the stated purpose.



3. How we obtain personal information

- Directly from you, for example when you contact us, register, send a CV, apply for a role or communicate with a consultant.
- From recruitment websites or CV databases where we have lawful access.
- From publicly available professional or business sources, which may include LinkedIn and other publicly accessible online sources.
- From referrals, clients, professional contacts or other third parties where lawful and relevant.
- From our website and scheduling or communications systems when you interact with them.

Where personal information has not been obtained directly from you, we will provide privacy information within the period required by applicable data protection law, subject to any lawful exemption.

4. Why we use information and our lawful bases

We determine an appropriate lawful basis for each processing purpose. Depending on the circumstances, this may include:

- Legitimate interests: providing recruitment and work-finding services, identifying potentially suitable candidates or clients, maintaining recruitment records, managing professional relationships and operating our business, where those interests are not overridden by the individual's rights and freedoms.
- Contract: taking steps at an individual's request before entering into a contract, or performing a contract with that individual.
- Legal obligation: complying with laws and regulatory requirements that apply to our recruitment activities.
- Consent: where consent is the appropriate lawful basis. Consent may be withdrawn at any time without affecting processing already carried out lawfully.
- Other lawful bases where the circumstances require them.

Where we rely on legitimate interests, we assess the purpose, necessity and impact on the individual and keep an appropriate record of that assessment. Consent is not treated as the default basis for all recruitment processing.

5. Special category and criminal-offence information

Information such as health information, racial or ethnic origin, religious or philosophical beliefs, trade-union membership, biometric data used for identification, sex-life or sexual-orientation information is subject to additional protection. If we process special category information, we will identify both an Article 6 lawful basis and an applicable Article 9 condition, together with any additional Data Protection Act 2018 requirement. Criminal-offence information will only be processed where permitted by law and with appropriate safeguards. Where required, we will maintain an appropriate policy document and carry out a data protection impact assessment.

6. Sharing personal information

We may share information only where necessary, lawful and proportionate, including with:



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- Clients or prospective clients in connection with a potential recruitment introduction. We will not ordinarily send a candidate's CV or substantively identify the candidate to a client for a particular opportunity without the candidate's knowledge and agreement.
- Technology and service suppliers that support our operations, such as Microsoft 365, telecommunications, website, scheduling, hosting, security and other recruitment-related systems. Suppliers may change over time.
- Professional advisers, regulators, law-enforcement bodies or public authorities where disclosure is required or permitted by law.

Where a supplier processes information on our behalf, we expect suitable contractual and security protections to be in place. We do not sell personal information.

7. International transfers

Some service providers may store or access information outside the United Kingdom. Where a restricted international transfer occurs, we will use an appropriate transfer mechanism and safeguards required by UK data protection law, and will make further information available on request where appropriate.

8. Data retention

We keep personal information only for as long as it is needed for the purpose for which it was collected, including legal, regulatory, contractual and legitimate business requirements. Recruitment records that fall within the Conduct of Employment Agencies and Employment Businesses Regulations 2003 are retained for at least the applicable statutory minimum period. Other retention periods are determined by the nature of the information, the purpose of processing and relevant legal or business requirements.

At the end of the relevant retention period, information will be securely deleted or anonymised unless there is a lawful reason to retain it for longer.

9. Accuracy, security and confidentiality

We take reasonable steps to keep information accurate and up to date and to protect it against unauthorised or unlawful processing, accidental loss, destruction or damage. Measures may include access controls, authentication, secure cloud services, appropriate device and account security, backups, staff awareness and supplier controls. Individuals should tell us if their information changes or appears to be inaccurate.

10. Your data protection rights

Depending on the circumstances, you may have the right to:

- Be informed about how your personal information is used.
- Request access to your personal information.
- Request correction of inaccurate or incomplete information.
- Request erasure in certain circumstances.
- Request restriction of processing in certain circumstances.



- Receive or transfer certain information where the right to data portability applies.
- Object to processing based on legitimate interests and, separately, object to direct marketing.
- Withdraw consent at any time where processing is based on consent.
- Have safeguards in relation to certain solely automated decisions that produce legal or similarly significant effects.

These rights are not absolute and may be subject to legal conditions or exemptions. To exercise a right, contact Nicola Rafferty using the details at the beginning of this policy. We may need to verify your identity before acting on a request.

11. Direct marketing and recruitment communications

Recruitment communications and direct marketing are managed in accordance with applicable data protection and electronic-marketing rules. You may ask us to stop direct marketing at any time. A request to stop marketing does not necessarily require deletion of all recruitment records where another lawful reason for keeping them applies.

12. Automated decision-making and profiling

We do not intend to make solely automated decisions about individuals that produce legal or similarly significant effects unless we have a lawful basis and the required safeguards. If this changes, we will provide appropriate information about the logic involved, significance and expected consequences where the law requires it.

13. Children's information

Our recruitment services are not directed at children. If we need to process information about a person under 18 in a specific recruitment context, we will apply additional care and safeguards appropriate to the circumstances.

14. Complaints and questions

Questions, concerns and requests about this policy or our handling of personal information should first be directed to Nicola Rafferty at nicky@thejoboffice.com or 01476 573639.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection. Current contact and complaint information is available at <https://ico.org.uk/make-a-complaint/>.

15. Policy review and changes

We may update this policy when our services, suppliers, technology or legal obligations change. The current version should be made available on our website or supplied on request. Material changes should be communicated where appropriate.