

DATA PROTECTION & UK GDPR

Privacy Notice

Comprehensive Candidate & User Data Governance Policy

Effective: January 2026 UK GDPR / DPA 2018 Compliant Data Controller: Emerald247

1. Introduction & Scope

Emerald247 ("we", "us", "our") is committed to protecting the privacy, accuracy, and security of personal data in full compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**. This Privacy Notice governs how we collect, process, store, and transfer personal data concerning candidates, job applicants, website users, and individuals seeking work opportunities through our recruitment services.

Emerald247 acts as a **Data Controller** in respect of the personal data provided to us for work-finding, candidate matching, and staffing placement services.

2. Information We Collect

To provide specialist recruitment and placement across our six core sectors (Hospitality, Factory Workers, Cleaners, Teaching, CIS Construction, and Healthcare), we process the following categories of data:

- **Personal & Contact Data:** Full legal name, residential address, telephone contact numbers, and personal email address.
- **Curriculum Vitae (CV) & Work History:** Full employment history, qualifications, educational background, professional certificates, accreditations (e.g. QTS, TRA, NMC, GMC, CSCS, RTITB, SIA), work samples, and referee contact details.
- **Identity & Right to Work Documentation:** Passports, national ID cards, biometric residence permits, Home Office share codes, visa statuses, and National Insurance numbers.
- **Vetting & Safeguarding Data:** Enhanced Disclosure and Barring Service (DBS) certificates, overseas police clearances, barred list checks, and health fitness declarations where required for regulated activity (Healthcare and Education).
- **Financial & Payroll Information:** Bank account numbers, sort codes, HMRC tax codes, P45/P60 documents, and Unique Taxpayer References (UTR) for CIS subcontractors.

3. Lawful Basis for Processing

We process your data under the following legal bases pursuant to Article 6 of the UK GDPR:

- **Contractual Necessity (Art. 6(1)(b)):** To take necessary steps at your request to identify suitable vacancies, introduce you to prospective employers, and administer candidate contracts.
- **Legal Obligation (Art. 6(1)(c)):** To satisfy statutory compliance, including the Conduct of Employment Agencies and Employment Businesses Regulations 2003, Right to Work legislation, HMRC tax laws, and statutory safeguarding requirements.
- **Legitimate Interests (Art. 6(1)(f)):** To manage and improve recruitment operations, deliver tailored career opportunities, maintain placement records, and safeguard commercial interests.
- **Explicit Consent (Art. 6(1)(a) & Art. 9(2)(a)):** Where special category data or optional marketing services require prior express authorization.

4. Data Sharing & Third-Party Disclosure (CV Introductions)

As a core function of our recruitment services, candidate personal data and CVs are shared with relevant third parties strictly for the purpose of work-finding and placement fulfillment:

- **Prospective Hiring Employers & Client Organisations:** We share candidate CVs, work histories, verified skills, and compliance documentation with schools, NHS trusts, hospitality venues, warehouse operators, and construction contractors with matching vacancies.
- **Vetting & Accreditation Authorities:** Disclosure and Barring Service (DBS), Home Office, Teaching Regulation Agency (TRA), Nursing and Midwifery Council (NMC), and accredited background check providers.
- **Authorized Payroll & Umbrella Partners:** HMRC-compliant umbrella companies and payroll software partners to facilitate weekly candidate remuneration.
- **IT & Cloud Infrastructure Providers:** Secure UK-hosted enterprise CRM, database, and document verification software operating under strict data processing agreements.

5. Data Retention & Security Measures

Candidate records are maintained securely using encrypted databases, role-based access restrictions, and multi-factor authentication. Personal records are retained for the duration of your active candidate relationship plus statutory limitation periods (typically 6 years post-assignment for HMRC tax and compliance audits), after which data is securely purged or anonymized.

6. Your Statutory Rights

Under the UK GDPR, you have the right to request access to your personal data (Subject Access Request), request rectification of inaccurate records, request erasure where statutory retention does not apply, restrict processing, or object to processing. To exercise any of these rights, contact our Data Protection Team at privacy@emerald247.co.uk.