

## TPF Recruitment Privacy Policy

Protecting your personal data is important to us. This privacy policy explains how TPF Recruitment Ltd processes and protects personal data about:

- candidates who register with us for roles we manage for other employers or for roles within TPF Recruitment
- prospective candidates
- business contacts at our clients and suppliers
- users of our website

(collectively referred to as “you” or “your”).

It also outlines your privacy rights, including your right to object to certain types of processing. For details on how to contact us, please see the “Contact Us” section at the end of this policy.

### Personal data we collect

#### Candidates

When you register with us so we can provide work finding services, we process personal data including your name, contact details and the information contained in your CV. Where permitted by law, we may process additional information such as:

- health information, for example disability details needed for reasonable adjustments
- diversity information such as ethnic origin, sexual orientation or religion for equal opportunities monitoring
- unspent criminal convictions or bankruptcy details, where required by a client or if you apply for a role with us

If you interact with our website, open or forward our emails, sign up for job alerts or engage with our content, we collect personal data from those interactions.

We may also obtain personal data from third parties including:

- referees
- former employers to confirm employment dates
- educational institutions to verify qualifications
- the Disclosure and Barring Service or Disclosure Scotland where a criminal record check is required

- credit reference agencies where financial standing checks are necessary
- publicly available sources such as LinkedIn and professional social platforms
- clients who have interacted with your CV or interview process

### **Additional candidate information**

As part of our registration and compliance process, we may collect further information from candidates, including:

- proof of identity
- right to work documentation
- copies of professional or academic qualifications
- completed registration or onboarding forms
- information required for compliance checks requested by our clients

We collect this information so we can assess your suitability for roles, comply with legal or regulatory obligations, and provide work finding services. Where necessary and relevant to a specific opportunity, we may share this information with clients as part of the recruitment process.

### **Prospective candidates**

We collect your name, contact details and professional information from publicly available sources or recommendations from other candidates or employers. This allows us to contact you in future if we believe you may be interested in our services or suitable for relevant opportunities.

### **Users of our website**

We collect personal data such as your IP address, device information, browsing behaviour and engagement with our pages. If you contact us through the website, we process details of your enquiry. We use cookies and similar technologies to collect this information.

### **Clients**

We process your name, job title and contact details, as well as information about our communications with you, including interactions with our emails or newsletters. We also process feedback you provide about candidates and information you give when we request employment references or verify a candidate's history.

We may obtain your details from public sources such as LinkedIn or from event organisers who lawfully share delegate information.

## **Suppliers**

We typically collect your name and contact details as a business contact for your organisation.

### **Providing your personal data**

In some cases, providing personal data is necessary so we can offer you our services. If you do not provide the information requested, we may be unable to deliver certain services or engage with you effectively.

We rely on the accuracy of the information supplied to us and ask that you notify us promptly of any changes so we can maintain up to date and accurate records.

### **How we use your personal data**

#### **Candidates**

We use your personal data to:

- provide you with work finding services
- communicate with you throughout the recruitment process
- allow you to upload your CV and apply for roles
- create a candidate profile to identify suitable opportunities
- monitor equality and diversity
- provide interview and salary guidance
- send you marketing related to job opportunities, industry updates, events and relevant content in line with your preferences
- run targeted advertising based on your interactions with our content

Your engagement with our marketing may be used to measure campaign effectiveness and improve our communication strategy.

#### **Prospective candidates**

We use your personal data to:

- assess whether you may be interested in current or future opportunities
- contact you to discuss how we may assist you

#### **Users of our website**

We use your personal data to:

- improve and personalise your experience
- personalise the advertising you receive from us

### **Clients**

We use your personal data to:

- provide recruitment services
- communicate with you and manage our business relationship
- seek feedback through surveys
- respond to your enquiries
- fulfil contractual obligations
- establish, exercise or defend legal claims
- send you relevant marketing communications

### **Suppliers**

We use your personal data to:

- communicate with you
- manage our working relationship
- respond to your enquiries
- fulfil contractual obligations
- establish, exercise or defend legal claims
- send you relevant marketing communications

### **Legal grounds for processing personal data**

We rely on the following legal bases under the UK GDPR:

#### **(a) Performance of a contract**

Where processing is necessary to perform our obligations or to take steps at your request before entering into a contract.

#### **(b) Compliance with a legal obligation**

Where we must process personal data to meet legal or regulatory requirements.

#### **(c) Legitimate interests**

We process personal data for purposes including:

- providing recruitment services
- communicating with candidates, clients and suppliers
- responding to enquiries
- optimising our website, systems and user experience
- informing you about our services
- maintaining effective business operations
- protecting our legal rights

#### **(d) Consent**

In some situations we rely on consent, such as job alerts or certain marketing. You may withdraw your consent at any time.

#### **Automated decision making**

We use a CV parsing tool which helps organise and filter applications based on key words and experience. This supports us in handling high volumes of applications.

We do not make any automated decisions that have a legal or significant effect on you. All suitability decisions involve human review.

You have the right to object and request human intervention.

#### **Who we share your personal data with**

We may share your personal data with:

#### **Clients**

If you are a candidate, we share your details with clients who have appropriate vacancies. You may ask us to restrict which clients receive your information.

Third party service providers

These include providers who support us with:

- reference and qualification checks
- criminal record checks
- information verification
- psychometric testing

- data hosting and storage
- professional or legal advice
- analytics and reporting
- system development
- surveys and competitions
- communication and marketing services

All third party processors are required to meet appropriate confidentiality and data protection standards. Where personal data is transferred outside the UK or EEA, we ensure appropriate safeguards are in place.

#### **How long we keep your personal data**

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including legal, regulatory, accounting or reporting obligations.

As we often support candidates over many years, we may retain candidate data beyond a single placement.

For direct marketing, we process your data until you ask us to stop and then maintain a record of your preference to ensure it is respected.

#### **Your rights**

You have the right to:

- request a copy of your personal data
- correct inaccuracies
- request deletion in certain circumstances
- restrict our processing
- obtain data you have provided in a portable format
- request data is shared with another controller
- object to processing, especially for direct marketing

These rights may be limited in certain cases to protect the rights of others or to comply with legal obligations.

#### **Security, accuracy and misdirected communication safeguards**

We take appropriate technical and organisational measures to protect your data. These include access controls, secure systems, encryption, staff training, data minimisation and regular reviews.

We have implemented measures to minimise the risk of misdirected communications, including internal checks, template controls and confirmation steps. We also maintain an incident response procedure in line with ICO guidance.

### **Children's data**

Our services are not intended for individuals under the age of 18 and we do not knowingly collect personal data relating to children.

### **Contact us**

To exercise your rights, withdraw consent or ask about this policy, please contact us:

Email: [GDPR@TPFrecruitment.com](mailto:GDPR@TPFrecruitment.com)

Post: TPF Recruitment Ltd, 2 The Links, Herne Bay, Kent CT6 7GQ

### **Complaints**

If you have unresolved concerns and are based in the UK, you have the right to complain to the Information Commissioner's Office (ICO):

Telephone: 0303 123 1113

Website: [ico.org.uk/concerns](http://ico.org.uk/concerns)

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

If you live outside the UK, you may instead choose to contact your local supervisory authority within the EEA.

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