



JGA Recruitment Group Ltd - Data Protection Policy

1. Introduction

JGA Recruitment Group Ltd is committed to protecting the privacy and rights of individuals in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

As a recruitment business, we process personal data relating to candidates, workers, employees, contractors, clients, suppliers, and other relevant individuals. This policy sets out how we ensure that personal data is processed lawfully, fairly, transparently, securely, and responsibly.

Personal data will only be processed where there is a clear business need and an appropriate lawful basis, and will be handled in a manner that protects the rights and freedoms of individuals.

2. Scope

This policy applies to:

- All employees, contractors, and temporary workers of JGA Recruitment Group Ltd
- All personal data processed by the organisation, whether held electronically or in paper format
- All processing activities carried out in the course of recruitment, employment, payroll, HR, finance, marketing, and business operations

3. Lawful Basis for Processing

JGA Recruitment Group Ltd processes personal data only where a lawful basis under **Article 6 UK GDPR** applies. These may include:

- **Contractual necessity** – where processing is required to enter into or perform a contract
- **Legal obligation** – where processing is required to comply with employment, tax, or regulatory law
- **Legitimate interests** – where processing is necessary for business purposes and does not override individual rights
- **Consent** – where individuals have provided clear and informed consent
- **Vital interests or public task**, where applicable

Where **special category data** is processed (e.g. health, equality, or criminal records information), an additional lawful condition under **Article 9 UK GDPR** will be identified and documented.

4. Categories of Personal Data

JGA Recruitment Group Ltd may process personal data relating to:

- Prospective, current, and former candidates
- Prospective, current, and former employees and workers
- Client and supplier contacts
- Referees and emergency contacts

This may include contact details, employment history, qualifications, payroll data, right-to-work information, and other data relevant to recruitment and employment services.



5. Data Protection Principles

All personal data is processed in accordance with the seven UK GDPR principles:

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality (security)
7. Accountability

JGA Recruitment Group Ltd is responsible for demonstrating compliance with these principles.

6. Data Subject Rights

Individuals whose personal data we process have the following rights under UK GDPR:

- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object
- Rights relating to automated decision-making and profiling

Requests to exercise these rights can be made in writing or by email. No fee is charged for making a request, unless it is manifestly unfounded or excessive.

Requests will be responded to within one month, subject to verification of identity.

7. Subject Access Requests (SARs)

All Subject Access Requests must be handled in accordance with UK GDPR requirements.

JGA Recruitment Group Ltd will:

- Verify the identity of the requester
- Respond within one calendar month
- Provide information in a clear and accessible format
- Apply exemptions only where permitted by law

SARs should be directed to:

Data Protection Contact

JGA Recruitment Group Ltd
Suite 4, 1 Lea Business Park
Lower Luton Road, Harpenden
Hertfordshire, AL5 5EQ
Email: info@jgarecruitment.com



8. Data Sharing and Third Parties

Personal data may be shared with trusted third parties where necessary for legitimate business purposes, including payroll providers, IT service providers, and professional advisers.

All third parties are required to:

- Process data only on documented instructions
- Implement appropriate technical and organisational security measures
- Comply with UK GDPR requirements through contractual safeguards

Personal data is **never sold** to third parties.

9. International Data Transfers

Where personal data is transferred outside the UK, JGA Recruitment Group Ltd ensures that appropriate safeguards are in place, such as:

- UK adequacy regulations
- International Data Transfer Agreements (IDTA)
- UK Addendum to EU Standard Contractual Clauses
- Transfer Risk Assessments, where required

10. Data Retention and Disposal

Personal data is retained only for as long as necessary for the purpose for which it was collected, taking into account legal, regulatory, and contractual requirements.

At the end of the retention period, personal data is securely deleted or destroyed using appropriate confidential disposal methods.

11. Data Security

JGA Recruitment Group Ltd implements appropriate technical and organisational measures to protect personal data against:

- Unauthorised or unlawful processing
- Accidental loss, destruction, or damage

Access to personal data is restricted to authorised personnel on a need-to-know basis.

12. Complaints

Individuals have the right to lodge a complaint with the Information Commissioner's Office (ICO) if they believe their data protection rights have been infringed.

ICO website: <https://www.ico.org.uk>

13. Policy Review

This policy is reviewed regularly and updated as necessary to reflect changes in legislation, guidance, or business operations.

JGA Recruitment Group Ltd, Suite 4, 1 Lea Business Park, Lower Luton Road, Harpenden AL5 5EQ Tel: 01727 800377
Registered Office: Kensworth Gate, 200-204, High Street, Dunstable, Beds. LU6 3HS
Registered England & Wales: 5815110 VAT Registration No: 927 6746 81