



JGA Recruitment Group Ltd - Privacy Notice

JGA Recruitment Group ("We") are committed to protecting and respecting your privacy. This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

In the United Kingdom, data protection is governed by the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The Privacy and Electronic Communications Regulations 2003 (as amended) (PECR) also apply to certain electronic marketing and the use of cookies and similar technologies. In addition, the Data (Use and Access) Act 2025 (DUAA) makes amendments to UK data protection and e-privacy laws which are being phased in between June 2025 and June 2026. Where our processing is subject to the EU General Data Protection Regulation (EU GDPR) (for example, where we provide services in the EEA/EU or process personal data in connection with offering services to individuals in the EEA/EU), we will also comply with the EU GDPR and applicable local implementing laws.

As an employment agency and employment business, JGA Recruitment Group Ltd is registered with the Information Commissioner's Office (ICO).

We are corporate members of the Recruitment & Employment Confederation (REC) and take a proactive approach to complying with legislation and regulations affecting the recruitment industry.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of data protection law, the data controller is JGA Recruitment Group Ltd.

Registered address: Suite 4, 1 Lea Business Park, Lower Luton Road, Harpenden, Hertfordshire, AL5 5EQ. Registered in England & Wales: 5815110. VAT: 927 674681.

EEA/EU coverage This privacy notice is intended to meet transparency requirements in both the UK and the EEA/EU. Where the EU GDPR applies to our processing, references in this notice to the "UK GDPR" should be read as references to the EU GDPR where relevant, and you may have equivalent rights and protections under the EU GDPR.

Our data protection contact is Ros Winchester.

Who are we and what we do?

We are a recruitment business as defined in the Employment Businesses Regulations 2003 (our business). We collect the personal data of the following types of people to allow us to undertake our business.

- Prospective and placed candidates for permanent, contract, interim and part-time roles
- Prospective and live client contacts
- Supplier contacts to support our services
- Employees, consultants, part-time workers

We collect information about you to carry out our core business and ancillary activities.

Information you give to us, or we collect about you.

This is information about you that you give us by filling in forms on our site www.jgarecruitment.com (our site) or by corresponding with us in person, by phone, e-mail or otherwise. It includes information you provide when you register your candidature with us, request our recruitment services, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our site, enter a competition, promotion, or survey, and when you report a problem with our site.



The information you give us, or we collect about you may include your name, address, private and corporate email address and phone number, financial information, compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate websites.

Information we collect about you when you visit our website.

Regarding each of your visits to our site we will automatically collect the following information:

Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, operating system, and platform, information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), service you viewed or searched for page response times, download errors, length of visits to certain pages, methods used to browse away from the page.

Information we obtain from other sources.

This is information we obtain about you from other sources such as LinkedIn, corporate websites, job board websites, online CV libraries, your business card, personal recommendations. Upon request, we will inform you, by sending you this privacy notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.

Purposes of the processing and the legal basis for the processing We use information held about you in the following ways:

- To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us, or we think will be of interest to you because it is relevant to your career or to your organisation.
- To provide you with information about other services we offer that are like those that you have been provided with or enquired about.
- The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of permanent, contract, interim and part-time engagement. However, our service expands to support individuals throughout their career and to support businesses' recruitment needs and strategies.
- Our legal basis for the processing of personal data is for our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation, and consent for specific uses of data.
- We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.
- We will rely on legal obligations if we are legally required to hold information on to you to fulfil our legal obligations.
- We will, in some circumstances, rely on consent for use of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate).

Our Legitimate Business Interests

Our legitimate interest in collecting and retaining your personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.



To support our candidates' career aspirations and our clients' resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements. To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts.

Consent

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this processing at any time.

Other Uses we will make of your data:

Use of our website:

- To notify you about changes to our service;
- To ensure that content from our site is presented in the most effective manner for you and for your computer.

We will use this information:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To improve our site to ensure that content is presented in the most effective manner for you and for your computer.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.
- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

We do not undertake automated decision-making or profiling which produces legal effects concerning you or similarly significantly affects you. We use our systems to search, sort and identify information in accordance with parameters set by a person, and a person will always be involved in making decisions. If we introduce any significant automated decision-making in the future, we will provide appropriate information and safeguards in line with the UK GDPR (as amended, including by the Data (Use and Access) Act 2025), including the right to obtain human intervention, to express your point of view and to contest the decision where applicable.

Cookies and similar technologies

Our website uses cookies and similar technologies to distinguish you from other users, help our website work, and understand how it is used. Where required by law, we will ask for your consent before placing cookies (or similar technologies) on your device. You can manage your preferences through your browser settings and, where available, our cookie controls. We comply with PECR and the UK GDPR in relation to these technologies.

Disclosure of your information and international transfers

- We will share your personal information with selected third parties including:
- Clients for the purpose of introducing candidates to them.
- Candidates for the purpose of arranging interviews and engagements.
- Clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into, with them, or you.
- Subcontractors including email marketing specialists, event organisers, payment, and other financial service providers.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- Credit reference agencies, our insurance broker, compliance partners and other sub-contractors for the purpose of assessing your suitability for a role where this is a condition of us entering into a contract with you.



We will disclose your personal information to third parties:

- If we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If JGA Recruitment Group Limited or substantially all its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data to comply with any legal obligation, or to enforce or apply our terms and conditions of supply of services and other agreements; or to protect the rights, property, or safety of JGA Recruitment Group Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The lawful basis for the third-party processing will include:

- Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs.
- Satisfaction of their contractual obligations to us as our data processor.
- For the purpose of a contract in place or in contemplation.
- To fulfil their legal obligations.

Where we store and process your personal data

We may transfer your personal data to service providers or clients outside the UK and/or the EEA where this is necessary for our recruitment services. Where this involves a “restricted transfer” under the UK GDPR, we will put appropriate safeguards in place (for example, the UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses) and complete a transfer risk assessment (TRA) where required. Where the EU GDPR applies and we make transfers of personal data outside the EEA that are restricted, we will use appropriate safeguards such as the EU Standard Contractual Clauses (and supplementary measures where necessary) or rely on an applicable adequacy decision. We will take steps reasonably necessary to ensure your data is treated securely and in accordance with this privacy notice.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Retention of your data

We keep your personal data only for as long as necessary for the purposes we collected it for, including to meet our legitimate business needs and any legal, accounting, or reporting requirements. We apply a retention schedule and run periodic reviews to delete, anonymise or (where appropriate) pseudonymise data we no longer need.

We do the following to try to ensure our data is accurate:

- Prior to making an introduction we check that we have accurate information about you
- We keep in touch with you so you can let us know of changes to your personal data

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:

- The nature of the personal data
- Its perceived accuracy
- Our legal obligations
- Whether an interview or placement has been arranged; and
- Our recruitment expertise and knowledge of the industry by country, sector and job role.



We may archive part or all your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so. For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms. Our current retention notice is available upon request.

Your rights

You have the right to ask us not to use your personal data for direct marketing. Where electronic marketing rules apply, we will comply with the Privacy and Electronic Communications Regulations 2003 (as amended) (PECR) as well as the UK GDPR. You can opt out at any time.

You can exercise your right to accept or prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at info@jgarecruitment.com

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

If you have a concern about how we use your personal data, please contact us first so we can try to resolve it. The Data (Use and Access) Act 2025 (DUAA) also introduces changes to complaint handling, including enabling people to complain directly to organisations in certain circumstances. We will acknowledge and respond to complaints within appropriate timescales, and we may ask you for information to help us investigate.

Your rights under the UK GDPR

- Request access to your personal data (often referred to as a “subject access request”).
- Request correction of the personal data we hold about you (so it is accurate and complete).
- Request erasure of your personal data in certain circumstances.
- Object to processing in certain circumstances (including an absolute right to object to direct marketing).
- Request restriction of processing in certain circumstances.
- Request data portability in certain circumstances.

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