



Ethical Marketing, Advertisement, and Customer Engagement Policy

This policy is intended to reflect the UK legal and regulatory framework in force as of August 2026. It should be read alongside JGA's Privacy Notice, Data Protection Policy, Cookie Policy and any relevant recruitment compliance procedures. Where legislation, regulatory guidance or an applicable advertising code imposes a higher standard, that standard will apply.

1. Legal and Regulatory Framework

Our marketing, advertising and customer engagement activities will be conducted in accordance with applicable requirements, including:

- the UK General Data Protection Regulation (UK GDPR), as amended;
- the Data Protection Act 2018;
- the Data (Use and Access) Act 2025 (DUAA), including amendments to UK data protection law and the Privacy and Electronic Communications Regulations;
- the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR), as amended;
- the Digital Markets, Competition and Consumers Act 2024, including the unfair commercial practices regime where applicable;
- the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code) and, where relevant, the UK Code of Broadcast Advertising (BCAP Code);
- the Employment Agencies Act 1973 and the Conduct of Employment Agencies and Employment Businesses Regulations 2003, as amended;
- the Equality Act 2010 and applicable anti-discrimination requirements; and
- the Business Protection from Misleading Marketing Regulations 2008 where business-to-business advertising is within scope.

2. Transparency, Accuracy and Substantiation

- Marketing communications and advertisements must be identifiable, accurate, clear and not materially misleading, whether by statement, presentation or omission.
- Objective claims must be supported by appropriate evidence before publication. Qualifications and material limitations must be prominent and must not contradict the main claim.
- Fees, charges, significant terms, conditions and other material information must be disclosed where required and presented clearly.
- Comparisons with competitors must be fair, verifiable and not misleading or disparaging.



3. Recruitment Advertising

- Vacancies advertised must be genuine and must not create a misleading impression about the availability or nature of work.
- Where required by the CAP Code, advertisements must clearly identify JGA Recruitment Group Ltd as the employment agency or employment business and provide appropriate contact details.
- Advertisements must make clear whether a role is temporary or permanent and must accurately describe employment status, including where a role is self-employed, contract, fixed-term or otherwise not permanent employment.
- Salary, earnings, commission, benefits and other remuneration claims must be accurate, capable of substantiation and presented so that candidates are not misled about likely or guaranteed earnings.
- Job advertisements and targeting practices must not unlawfully discriminate on the basis of protected characteristics. Any occupational requirement must have a lawful basis.

4. Data Protection and Privacy

- Personal data used for marketing or customer engagement must be processed lawfully, fairly and transparently, for specified purposes, and in accordance with the data protection principles.
- We will identify and document an appropriate lawful basis for processing personal data. Consent will be obtained where consent is legally required; we will not describe consent as required where another lawful basis is relied upon.
- Where legitimate interests are relied upon, we will assess and document the relevant interests, necessity and impact on individuals. Individuals have an absolute right to object to processing of their personal data for direct marketing, and such objections must be honoured promptly.
- Privacy information must explain, in clear terms, how personal data is collected, used, shared and retained, and how individuals can exercise their rights.
- Personal data must be limited to what is necessary, kept accurate, retained only as long as required and protected by appropriate technical and organisational security measures.

5. Electronic, Telephone and Postal Direct Marketing

- Email, SMS, direct messages and other electronic marketing to individuals must comply with PECR. Where PECR requires consent, valid consent must be obtained before marketing is sent unless a lawful statutory exception, such as the applicable customer 'soft opt-in', is available.
- The customer soft opt-in will only be used where all statutory conditions are met, including that contact details were obtained in the course of a sale or negotiations for a sale, the marketing concerns JGA's similar products or services, and a simple opportunity to opt out was provided when the details were collected and in every subsequent message.



- Marketing communications must identify the sender and provide a valid, simple means to unsubscribe or object. Suppression records should be maintained so that people who opt out are not inadvertently contacted again for direct marketing.
- Business-to-business electronic marketing will be handled in accordance with PECR and data protection law, recognising that personal data relating to named business contacts remains subject to UK data protection requirements.
- Telephone marketing must comply with PECR and applicable preference services and objection records. Postal marketing must have an appropriate data protection lawful basis and must cease where an individual objects.

6. Cookies and Similar Technologies

Where JGA uses cookies, pixels or other storage and access technologies for advertising, analytics or customer engagement, we will comply with PECR as amended by the DUAA. Consent will be obtained where required. Where a statutory exception permits use without consent, the technology will only be used within the scope of that exception and any required information and simple means of objection will be provided.

7. Data Sharing and Third Parties

- JGA Recruitment Group Ltd will not sell personal data to third parties.
- Personal data may be shared with processors, service providers, event partners, sponsors or other third parties only where there is a lawful basis, the sharing is necessary and proportionate for a specified purpose, and required transparency information has been provided.
- Consent will be obtained for third-party marketing where consent is required by law. We will not rely on vague or bundled consent.
- Appropriate contracts, due diligence and security measures will be used where third parties process personal data on JGA's behalf. International transfers will use an approved UK transfer mechanism where required.

8. Social Media, Testimonials and Endorsements

- Paid, incentivised, sponsored or otherwise controlled promotional content must be obviously identifiable as advertising where required by the CAP Code.
- Testimonials, reviews, case studies and endorsements must be genuine, used with appropriate permission and must not be presented in a misleading way.
- Personal data, photographs, quotations or identifiable case studies will not be used for promotional purposes without an appropriate lawful basis and any consent required by law or applicable advertising rules.



9. Fairness, Inclusion and Social Responsibility

- Marketing and advertising must be prepared with a due sense of responsibility and must not exploit vulnerable people, cause serious or widespread offence, or perpetuate harmful discriminatory stereotypes.
- We will promote fair access to opportunities and support diversity and inclusion while ensuring that targeting, segmentation and automated tools do not result in unlawful discrimination.
- Environmental or social responsibility claims must be accurate, specific and capable of substantiation.

10. Individual Rights, Complaints and Objections

- Requests to exercise data protection rights, including objections to direct marketing, must be recognised and routed promptly to the appropriate person or team.
- JGA will maintain a data protection complaints process that meets the requirements introduced by the DUAA. Data protection complaints will be acknowledged, investigated and concluded within the applicable statutory requirements, with individuals informed of the outcome and their right to complain to the Information Commissioner's Office where appropriate.
- Marketing preferences and suppression records will be respected across relevant systems and channels.

11. Governance, Training and Monitoring

- Employees, contractors and agents involved in marketing, advertising, recruitment advertising or customer engagement must receive appropriate training for their role.
- Higher-risk or novel campaigns, data uses, profiling or targeting activities should be assessed before launch and, where required, a data protection impact assessment or other compliance review will be completed.
- JGA will periodically review marketing claims, consent records, lawful-basis assessments, suppression lists, third-party arrangements and relevant policies to ensure continuing compliance.
- This policy will be reviewed at least annually and sooner where there is a material change in law, ICO guidance, the CAP/BCAP Codes or JGA's activities.

12. Implementation and Enforcement

This policy applies to all employees, contractors and agents acting on behalf of JGA Recruitment Group Ltd. Suspected breaches should be reported to a manager or the person responsible for data protection/compliance. Breaches may result in corrective action and, where appropriate, disciplinary action up to and including termination of employment or contract. Material incidents will be escalated and reported to regulators or affected individuals where required by law.



Conclusion

JGA Recruitment Group Ltd is committed to ethical, lawful and responsible marketing, advertising and customer engagement. Compliance is an ongoing obligation: campaigns and practices must be reviewed against current law, regulatory guidance and advertising standards rather than relying solely on this policy.

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