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## PRIVACY NOTICE

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### BACKGROUND:

Sancus Delta Limited (“the Company”) is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data so that it can provide these services. In so doing, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form, CV, or via our website, or we may collect them from another source, such as a jobs board. The Company must have a legal basis for processing your personal data. See below for more details. We will only use your personal data in accordance with the terms of this notice for the purposes of providing you with work-finding services and/or information relating to roles relevant to you.

#### 1. Information About Us

Sancus Delta Limited.

A limited company registered in England under company number 16308269.

Registered address: 85 Great Portland Street, First Floor, London, W1W7LT.

#### 2. What Does This Notice Cover?

This Privacy Notice explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### 3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

#### 4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.

- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

## 5. What Personal Data Do You Collect and How?

The Company may collect and hold some or all of the following personal data:

Data Collected	How We Collect the Data
Identity Information including name, title, date of birth, gender.	Directly from you, such as on an application or registration form, CV, or via our website.  From another source, such as a jobs board, referees.
Contact information including address, telephone number, email address, and LinkedIn and/or other social media links.	
Work and education information including CV and LinkedIn.	
Other identity information including nationality (for evidence to right to work).	
Other personal information including interview feedback.	

You are under no obligation to provide the Company with data. However, if you do not provide certain information, we will not be able to provide work-finding services.

## 6. How Do You Use My Personal Data?

The Company needs to collect and process data in order to offer work-finding services to you.

The Company will process your personal data for the purposes of providing you with work-finding services. This includes, for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, and developing and managing our services and relationship with you and our

clients.

In some cases, the Company may be required to collect and process your data for the purpose of investigating, reporting, and detecting crime, and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

The legal bases we rely upon to offer our services to you are:

- Your consent (e.g. to register you as a new candidate or to manage our relationship with you);
- Where we have a legitimate interest (e.g. managing our database and keeping work records up to date, providing work finding services to you and our clients, and contacting you to seek your consent where it is needed);
- To comply with a legal obligation that we are subject to (e.g. in order to check your entitlement to work in the UK).

The Company will only use your personal data for the purposes for which it was originally collected, unless we reasonably believe that another purpose is compatible with those original purposes and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purposes for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## **7. How Long Will You Keep My Personal Data?**

The Company will only hold your personal data for as long as is necessary to fulfil the purposes for which we collected it.

Different laws may also require us to keep data for different periods of time.

The Conduct of Employment Agencies and Employment Businesses Regulations 2003 require us to keep work-seeker records for at least one year from:

- the date of their creation; or
- after the date on which we last provide you with work-finding services.

Where the Company has obtained your consent to process your personal and sensitive data, we will do so in line with our Data Protection Policy. Upon expiry of the period to which you have consented, the Company will seek further consent from you. Where consent is not granted, we will not continue to process your data.

## **8. How and Where Do You Store or Transfer My Personal Data?**

Data is stored in a range of different places, including on your application record, in the Company's candidate management systems and in other IT systems (including the Company's email system).

We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;

and

- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

## 9. **Do You Share My Personal Data?**

The Company will process your personal data and/or sensitive personal data with the following recipients:

- HMRC;
- Clients of the Company;
- Any applicable legal or government authorities; and
- Previous employers (e.g. in respect of references).

When your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the UK (ie. to clients), we will take suitable steps in order to ensure that your personal data is treated by them just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

## 10. **How Can I Access My Personal Data?**

If you want to know what personal data we hold about you, you can ask us for details of that personal data and for a copy of it. This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Philip Browning):

Email address: [info@sancusdelta.com](mailto:info@sancusdelta.com)

Telephone number: 07837884558.

Postal Address: 85 Great Portland Street, London, W1W7LT.

## 12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website. This Privacy Notice was last updated on 18<sup>th</sup> March 2025.