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Introduction

PRIVACY POLICY

This privacy policy sets out how SoftHire LTD uses and protects your personal data. This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

- 1. IMPORTANT INFORMATION AND WHO WE ARE** (paragraph 1)
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1. Important information and who we are

Privacy policy

This privacy policy gives you information about how SoftHire LTD collects and uses your personal data through your use of this website, including without limitation any data you may provide when you register with us **OR** sign up to our newsletter **OR** purchase a product or service **OR** take part in a competition.

This website is not intended for children and we do not knowingly collect data relating to children.

Controller

SoftHire LTD is the controller and responsible for your personal data (collectively referred to as "COMPANY", "we", "us" or "our" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights (paragraph 8), please contact us using the information set out in the contact details section (paragraph 9).

2. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** means:
 - full name,
 - date of birth,
 - gender,
 - nationality and country of residence,
 - passport or other government-issued identification details,
 - national insurance number,
 - photograph or other biometric identifiers (if collected), and
 - any other unique identifiers we process for the purposes of recruitment, sponsorship, immigration compliance, or related services.
- **Compliance Data** means Information required to meet legal, regulatory, and immigration compliance obligations, such as: visa and immigration status, sponsor licence details, records of right to work checks, copies of relevant supporting documents (e.g., proof of qualifications, criminal record certificates, medical clearances where legally required), and data relating to our interactions with regulators such as the UK Home Office.
- **Contact Data** means information that allows us to contact an individual, such as: home or work address, email address, telephone number(s), and other communication details provided to us in the course of using our services.
- **Employment Data** means information relating to an individual's work history and current employment, such as: CVs, job titles, employer details, employment history, skills, professional qualifications, salary and compensation details, references, right to work status, and any other employment-related information required for recruitment or immigration sponsorship purposes.
- **Financial Data** includes [bank account and payment card details].
- **Transaction Data** includes [details about payments to and from you and other details of products and services you have purchased from us].
- **Technical Data** means information generated when an individual interacts with our website or online services, such as: IP address, browser type and version, device type, operating system, login data, time zone setting and location, web browser plug-in types and versions, and usage information collected through cookies and similar technologies.

- **Profile Data** includes [your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses].
- **Usage Data** includes [information about how you interact with and use our website, products and services].
- **Marketing and Communications Data** includes [your preferences in receiving marketing from us and our third parties and your communication preferences].

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - Technical Data is collected from the following parties:
 - analytics providers;
 - advertising networks; and
 - search information providers.
 - Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services based in the UK.
 - Identity and Contact Data is collected from data brokers or aggregators.
 - Identity and Contact Data is collected from publicly available sources such as Companies House.

4. How we use your personal data

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose	Categories of Data Used	Lawful Basis for Processing
To register you as a new client or candidate	Identity Data, Contact Data	Performance of a contract with you
To assess candidate suitability for roles and match candidates with employers	Identity Data, Contact Data, Employment Data	Performance of a contract; Legitimate interests (to provide effective recruitment services)
To manage immigration and sponsorship compliance processes (including right to work checks, visa applications, and sponsorship licence support)	Identity Data, Contact Data, Employment Data, Compliance Data	Compliance with a legal obligation; Performance of a contract
To carry out background checks and verify qualifications or employment history (where required by law or employer)	Identity Data, Employment Data, Compliance Data	Legal obligation; Legitimate interests (to ensure compliance and suitability)
To manage our relationship with you (e.g. notifying you about changes to our services, requesting feedback)	Identity Data, Contact Data	Performance of a contract; Legitimate interests (to keep records up to date)
To provide, administer, and improve our platform and services (including troubleshooting, data analysis, testing, and system maintenance)	Identity Data, Contact Data, Technical Data	Legitimate interests (to run our business, provide administration and IT services, ensure network security, improve our services)

Purpose	Categories of Data Used	Lawful Basis for Processing
To deliver relevant website content, marketing, and service updates	Identity Data, Contact Data, Technical Data	Consent (where required by PECR); Legitimate interests (to develop our products and services, grow our business)
To comply with legal and regulatory obligations (e.g., reporting to the UK Home Office, record-keeping for immigration compliance)	Identity Data, Contact Data, Employment Data, Compliance Data	Compliance with a legal obligation

Direct marketing

During the registration process on our website when your personal data is collected, you will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving the marketing.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of marketing

You can ask to stop sending you marketing communications at any time by contacting us at <https://www.softhire.co.uk>.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

Cookies

At present, our website does not use cookies or similar technologies to collect information about you. If this changes in the future, we will update this privacy policy and, where required, provide you with a clear notice and the option to consent to the use of non-essential cookies.

Disclosures of your personal data

We may share your personal data where necessary with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes

and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5. International transfers

We do not transfer your personal data outside the UK.

6. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

8. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.

You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see **OPTING OUT OF MARKETING** in paragraph 4 for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- [Withdraw consent at any time where we are relying on consent to process your personal data (see the table in section 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.]
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, [please contact us [see Contact details (paragraph 9)] **OR** [SPECIFIC DETAILS OF WHO TO CONTACT FOR SUBJECT ACCESS RIGHTS]].

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure

that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact [our DPO] **OR** [us] in the following ways:

- Email address: support@softhire.co.uk
- Postal address: SE10 0PP 27 East Parkside Flat 83, London

10. Complaints

You have the right to make a complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. You can find our complaints form here [LINK].

11. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. [This version was last updated on [DATE]. [Historic versions [are archived here: [LINK] **OR** can be obtained by contacting us]].]

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

12. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.