

## Privacy Policy

Swiftsparrow is committed to protecting the privacy and confidentiality of our clients and candidates. This Privacy Policy outlines how we collect, use, disclose, and store personal data in accordance with the UK Data Protection Act 1998 and the General Data Protection Regulation (GDPR).

### 1. Introduction

Swiftsparrow operates under the jurisdiction of English law. This policy aims to provide a clear and transparent explanation of our data processing practices.

### 2. Contacting Us

For any questions or concerns regarding this policy, please contact our Data Protection Officer at [christina@swiftsparrow.co.uk](mailto:christina@swiftsparrow.co.uk)

### 3. Data Controller

Swiftsparrow acts as the Data Controller for all personal data collected and processed as part of our recruitment services in the UK.

### 4. Data Collection

We collect essential information from clients and candidates through our website, in-person interactions, and affiliated partners. This data may include:

- **Candidates:** Name, contact details, employment history, right to work documentation, professional memberships, and references.
- **Clients:** Company registration details, organizational structure, contact information, and job specifications.

We collect only the data necessary to provide our recruitment services effectively.

### 5. How and When We Collect Information

Information is gathered through our website, online job boards, and direct interactions with candidates and clients (e.g., during registration, interviews, calls, and emails).

We collect and process data based on:

- **Express Consent:** We obtain explicit permission to store and use your data.
- **Legitimate Business Interest:** We process data necessary for fulfilling our recruitment services, ensuring minimal privacy impact.

Candidate data is primarily processed with express consent, transitioning to legitimate business interest upon successful placement. Client data is processed under legitimate business interest.

We may also verify and supplement the information provided with data from trusted third-party sources, such as Companies House and accredited bodies.

## **6. Use of Cookies**

Our website uses cookies to enhance user experience and analyze website traffic. We utilize Google Analytics to understand user behavior and optimize our content. Our use of cookies complies with Google's privacy policy (<http://www.google.com/analytics/learn/privacy.html>).

By using our website, you consent to our use of cookies. You can disable cookies in your browser settings if you prefer.

## **7. How We Use Your Data**

Swiftsparrow uses your data to provide and improve our recruitment services. This includes:

- Matching candidates with suitable job opportunities.
- Communicating with clients and candidates about relevant vacancies, applications, and industry updates.
- Conducting research and analysis to enhance our services.

We do not sell or share your personal information with third parties for marketing purposes.

## **8. Data Sharing and Disclosure**

We may share your information within Swiftsparrow to facilitate our services. We may also share data with third parties when necessary for service delivery (e.g., background checks). Candidate data is shared with clients only with the candidate's explicit consent and when there is a legitimate business interest.

We may disclose your information in the following circumstances:

- To comply with legal obligations.
- To protect our rights and interests.
- In the event of a business sale or transfer.

## **9. Data Security**

We prioritize the security of your personal data. We have implemented measures to protect your information, including access controls and secure data storage.

## **10. Data Retention and Deletion**

We retain your data only as long as necessary for the purposes outlined in this policy.

- **Candidate Data:** Stored for a maximum of two years after consent is granted or six years following successful placement (as required by law), unless renewed consent is obtained.
- **Client Data:** Retained under legitimate business interest.

## 11. Data Processing of Minors

Swiftsparrow does not provide services to individuals under the age of 18 and does not knowingly collect their data.

## 12. Access to Your Personal Data

You have the right to:

- Access your personal data held by Swiftsparrow.
- Request correction of any inaccuracies.
- Request deletion of your data.
- Withdraw your consent for data processing.

To exercise these rights, please contact our Data Protection Officer at [christina@swiftsparrow.co.uk](mailto:christina@swiftsparrow.co.uk)

## 13. Policy Updates

This policy may be updated periodically. We will notify users of any significant changes. Continued use of our services constitutes acceptance of this policy.

## 14. Useful Resources

- Information Commissioner's Office (ICO): [www.ico.org.uk](http://www.ico.org.uk)
- Your Online Choices: [www.youronlinechoices.com/uk/](http://www.youronlinechoices.com/uk/)