

#### TERRA RECRUITMENT - PRIVACY POLICY

Effective Date: 20th May 2025

Terra Recruitment Ltd ("we", "us", "our") respects your privacy and is committed to protecting your personal data. This policy explains how we collect, use, store, and share information in accordance with the **UK GDPR** and **Data Protection Act 2018**.

# This policy applies to:

- **Candidates** individuals we assist with job opportunities, including contractors and personal service companies
- Contacts individuals within client organisations we interact with
- **Referees** people providing references for candidates
- Website users anyone interacting with our website and cookies

#### 1. Data Controller

Terra Recruitment Ltd is the data controller for your personal data.

#### Contact details:

- Registered Address: 85 Great Portland Street, London, W1W 7LT
- Email: contact@terra-recruitment.com
- Phone: 0207 078 9046

#### 2. Personal Data We Collect

### Candidates:

- Contact info, employment history, CVs, qualifications
- Payroll and tax info, right-to-work documents
- Feedback, placement records, and work performance
- Sensitive data (e.g., health information for disability accommodations) only when explicitly provided

### **Contacts:**

• Contact info, job role, and work-related information

# Referees:

Contact info and reference-related work history

# Automatically collected data:

• IP address, cookies, and website usage information

# 3. How We Use Your Data & Lawful Basis

We process personal data for the following purposes:

- To provide recruitment services and manage applications Lawful basis: Contract performance / Legitimate interests
- **To comply with legal obligations** (e.g., tax, right to work, health & safety) Lawful basis: Legal obligation



- To communicate with candidates, clients, and referees Lawful basis: Legitimate interests / Consent (where required)
- To improve services, prevent fraud, and monitor equal opportunities Lawful basis: Legitimate interests
- Processing of special category data (e.g., health or disability information) Only
  processed with explicit consent or to comply with legal obligations

### 4. Data Sharing

We may share personal data with:

- Clients and service providers (payroll, IT, insurance, background checks) under strict data processing agreements
- Regulators or authorities when required by law
- **Group companies** for reporting, hosting, or restructuring purposes

We do not sell personal data or share it for marketing purposes without explicit consent.

#### 5. Data Retention

Data is retained only as long as necessary for legal and business purposes:

- **Candidates:** up to 6 years to comply with employment, tax, and legal record-keeping obligations
- **Contacts:** up to 4 years after last interaction for business continuity and compliance purposes
- **Referees:** up to 6 years after reference provided for legal and record-keeping requirements

After this period, data is securely deleted or anonymised.

# 6. Your Rights

You have the right to:

- · Access, correct, delete, or restrict your data
- Receive your data in a portable format
- Withdraw consent at any time (for specific purposes)
- Object to processing based on legitimate interests
- Lodge a complaint with the ICO (https://ico.org.uk)

Contact us to exercise your rights at <a href="mailto:contact@terra-recruitment.com">contact@terra-recruitment.com</a>

Complaints to the ICO must usually be made within **3 months** of awareness of a potential data issue.

#### 7. Security

We protect personal data with:

- · Secure storage, encryption, and restricted access
- Confidentiality agreements with third-party processors
- Physical security measures (locked cabinets, secure office access)
- Procedures to detect, report, and respond to data breaches within 72 hours as required by law

Terra Recruitment Ltd Registered Office: 85 Great Portland Street, London, W1W 7LT Company Number: 15335268



# 8. Cookies & Automated Processing

- We use cookies to improve website functionality and user experience. Non-essential cookies require your explicit consent
- We do **not** use your personal data for automated decision-making or profiling that significantly affects you

# 9. Changes to this Policy

We may update this policy periodically. The **effective date** will reflect the latest version. For significant changes, we will notify users appropriately.

Approved by: Yasmina Ezzegraoui

**Position: Director** Date: 20<sup>th</sup> May 2025

Signed: