

FLEXI RECRUITMENT

GDPR & Data Protection Policy

How Flexi Recruitment collects, processes, and protects personal data

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Document Contents

1. Scope & Principles
2. Data We Collect & Why
3. Lawful Basis
4. Candidate & Worker Rights
5. Retention Schedule
6. Data Breach Procedure
7. Subject Access Requests
8. Third Party Sharing

This document is the property of Flexi Recruitment. Review date: annually or following significant legislative change. Contact info@flexirecruitment.co.uk with queries.

1. Scope & Principles

Flexi Recruitment is a Data Controller under the UK GDPR and Data Protection Act 2018. This policy governs all personal data processed in connection with our recruitment activities.

We adhere to the following principles:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

2. Data We Collect & Why

Category	Examples	Purpose
Candidate Data	Name, contact, CV, DBS, RTW	Matching & compliance
Client Data	Contact names, billing details	Service delivery
Worker Data	Payroll, timesheets, training	Employment administration
Special Category	Health, DBS, immigration status	Legal obligation

3. Lawful Basis for Processing

- **Contract:** Processing necessary to fulfil our recruitment contract with you.
- **Legal Obligation:** Right to work checks, DBS checks, payroll obligations.
- **Legitimate Interests:** Matching candidates to suitable roles.
- **Consent:** Marketing communications, retention beyond active engagement.
- **Vital Interests:** Emergency health and safety situations.

4. Your Rights

Right	What it means
Access	Request a copy of your personal data (SAR)
Rectification	Correct inaccurate or incomplete data

Erasure	Request deletion where no overriding legal basis exists
Restriction	Limit how we use your data in certain circumstances
Portability	Receive your data in a structured, machine-readable format
Objection	Object to processing based on legitimate interests
Withdraw Consent	Withdraw consent at any time where consent is the lawful basis

5. Retention Schedule

Data Type	Retention Period
Unsuccessful candidate records	6 months
Active candidate records	Duration of engagement + 2 years
Pre-employment checks (DBS, RTW)	Duration of engagement + 6 years
Payroll & financial records	6 years (HMRC requirement)
Accident/incident records	3 years (10 years for RIDDOR)
Client agreements	Duration of contract + 6 years

6. Data Breach Procedure

- Any suspected breach must be reported to the designated data lead immediately.
- The ICO must be notified within 72 hours if the breach poses a risk to individuals.
- Affected individuals will be notified without undue delay where there is a high risk.
- All breaches are recorded in the internal Data Breach Register.
- To report a breach: info@flexirecruitment.co.uk

7. Subject Access Requests

Submit SARs in writing to info@flexirecruitment.co.uk. We will respond within one calendar month. We may ask for proof of identity before releasing data. There is no charge for standard requests.