



Disrupt Talent Limited

Data Protection & Privacy Policy

Introduction

Disrupt Talent Limited takes the security and privacy of your data seriously. We need to gather and use information or 'data' about you as part of our business and to manage our relationship with you. We intend to comply with our legal obligations under the Data Protection Act 2018 (the '2018 Act') and the UK General Data Protection Regulation ('UK GDPR') in respect of data privacy and security.

This policy applies to data processed regarding current and former employees and workers, job applicants, agency work seekers, agency workers and individual client contacts. If you fall into one of these categories, then you are a 'data subject' for the purposes of this policy.

You should read this policy alongside your contract of employment or contract for services and any other notice we issue to you from time to time in relation to your data.

Disrupt Talent Limited is registered with the Information Commissioner's Office (ICO). Our registration number is **ZB647297**.

We have measures in place to protect the security of your data in accordance with our Data Security Policy. A copy of this can be obtained from our Data Protection Officer:

Contact details

- **Data Protection Officer:** Nicky Grogan
- **Telephone:** 01926 954154
- **Email:** nicky@disrupttalent.co.uk

We will only hold data for as long as necessary for the purposes for which it was collected, in line with our Data Retention Policy.

Disrupt Talent Limited is the 'data controller' of your personal data. This means we determine the purpose and means of processing your personal data.

Our Privacy Notice is available on our website: www.disrupttalent.co.uk. This is provided to job applicants, work seekers and agency workers during the application process, and also to our clients.



Data Protection Principles

We are accountable for processing personal data in line with the following principles. It must:

- be processed fairly, lawfully and transparently;
 - be collected and processed only for specified, explicit and legitimate purposes;
 - be adequate, relevant and limited to what is necessary;
 - be accurate and kept up to date, with any inaccuracies corrected or deleted without delay;
 - not be kept for longer than necessary;
 - be processed in accordance with the rights of data subjects;
 - not be transferred to another country without appropriate safeguards; and
 - be processed securely.
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Key Definitions

- **Personal Data:** Any information relating to an identified or identifiable living individual.
 - **Special Categories of Personal Data:** Information relating to racial or ethnic origin, political opinions, religious beliefs, trade union membership, health, biometric or genetic data, sexual orientation, or criminal convictions.
 - **Processing:** Any operation performed on personal data (e.g. collecting, storing, using, sharing, or deleting).
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How We Process Your Data

We will only process personal data where we have a legal basis for doing so, which includes:

- **Compliance with legal obligations** (e.g. reporting to HMRC)
- **Performance of a contract** (e.g. payroll, benefits, employment contracts)
- **Legitimate interests** (e.g. business planning, monitoring performance, recruitment activity)

We will not use your personal data for an unrelated purpose without informing you.

Examples of Processing



We may process your personal data for:

- Recruitment and hiring decisions
- Paying salaries, benefits, and pensions
- Compliance with employment, tax, and health & safety law
- Training and performance management
- Providing references to future employers
- Monitoring equal opportunities and diversity
- Security, fraud prevention, and legal compliance

Special category data may also be processed in line with legal obligations or with your explicit consent.

Privacy by Design

We ensure privacy is embedded in our business processes and undertake Data Protection Impact Assessments (DPIAs) where necessary. Measures we use include:

- Data minimisation
- Encryption and pseudonymisation
- Anonymisation
- Cyber security controls

Data Sharing

We may share your personal data with trusted third parties (e.g. payroll providers, benefits providers, clients, insurers). These organisations are required to keep your data secure and only process it in line with our instructions.

We do not transfer your data outside the UK or the European Economic Area without appropriate safeguards.

Data Subject Rights

You have the right to:

- Access your personal data (Subject Access Request)
- Correct inaccuracies



- Request erasure of data where no lawful basis exists for processing
- Restrict processing in certain circumstances
- Object to processing carried out on legitimate interest grounds or for direct marketing
- Data portability (transfer of your data to another controller)
- Be informed of and object to automated decision-making/profiling
- Lodge a complaint with the ICO (www.ico.org.uk)

Requests should be sent in writing to:

Data Protection Officer – Nicky Grogan

Email: nicky@disrupttalent.co.uk

Telephone: 01926 954154

We aim to respond to Subject Access Requests within one month.

Data Breaches

If a data breach occurs, we will record details and, where required, notify the ICO within 72 hours. Where there is a high risk to your rights and freedoms, we will also notify you without undue delay.

Review and Updates

This policy does not form part of your contract of employment or contract for services, and may be updated from time to time. It is intended to comply with the Data Protection Act 2018 and UK GDPR.