PRIVACY NOTICE

Date of policy: 01/09/2026
This policy will be reviewed every 12 months (as a minimum)
Review Date: 01/09/2027

Parker Smith Inclusion ("We") are committed to protecting and respecting your privacy.

Any mention of "Our Group" means our subsidiaries, our ultimate holding company and its subsidiaries, our associated companies as defined in section 1159 of the UK Companies Act 2006 (our Group).

This agreement sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The UK General Data Protection Regulation (UK GDPR) (Regulation (EU) 2016/679) is a regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonise data protection legislation across EU member states, enhancing individuals' privacy rights and providing a strict framework within which commercial organisations can legally operate.

The Brexit transition period ended on 31 December 2020 and the UK has now officially left the EU. The UK GDPR has been directly incorporated into UK law, sitting alongside the Data Protection Act 2018.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Who we are:

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We collect the personal data of the following types of people to allow us to undertake our business.

- Prospective and placed candidates for permanent or temporary roles.
- Prospective and live client contacts.
- Supplier contacts to support our services.
- Employees, consultants, temporary workers.

We collect information about you to carry out our core business and ancillary activities.

Information you give to us or we collect about you:

The information you give us or we collect about you may include.

- Your name
- Address
- Private and corporate e-mail address and phone number
- Emergency contact details
- Financial information such as bank details for payroll purposes
- Compliance documentation relating to safeguarding purposes, such as references, verifying your qualifications, and your right to work in the United Kingdom
- Curriculum vitae
- Photograph
- Links to your professional profiles available in the public domain, e.g. LinkedIn, Twitter, business Facebook or corporate website
- NI details
- Marketing preferences

How we collect this information:

The information we collect about you will be provided by you, either by filling out a form on our website www.psinclusion.co.uk or by corresponding with us by phone, e-mail or otherwise. It will also include information you provide when you register to use our website, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our website, enter a competition, promotion, or survey, and when you report a problem with our website.

Information we obtain from other sources:

This is information we obtain about you from other sources, such as.

- Social media
- Corporate websites
- Job board websites
- Online CV libraries
- Your business card
- Personal recommendations
- Interview meeting
- Transcript recording from interview
- Call recordings
- And any relevant social media sites.

Where data has been obtained from a third party (for example CV database), we will inform you of the source when we first communicate with you.

Purposes of the processing and the legal basis for the processing:

We use information held about you in the following ways:

To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us, and to provide you with the information, products and services that you request from us, or we think will be of interest to you because it is relevant to your career or to your organisation.

To provide you with information about other goods and services we offer that are similar to those that you have already purchased, been provided with or enquired about.

The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary or permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

Our legal basis for the processing of personal data is our legitimate interests, described in more detail below, although we will also rely on contractual obligations to which you are subject, legal obligations and consent for specific uses of data.

We will rely on contractual obligations if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation in some cases, where we are required by law or regulation to process your data.

We will, in some circumstances, rely on consent for particular uses of your data. Where we rely on consent, you will be asked for your express consent. An example of when we will rely on consent as the legal basis for processing your data is when we process your data for marketing purposes.

Our Legitimate Interests:

Our legitimate interests in collecting and retaining your personal data is described below:

As a recruitment business and recruitment agency, we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contact details is a fundamental part of this process.

To support our candidates' career aspirations and our clients' resourcing needs, we require a database of candidate and client personal data. The database will contain historical information and current resourcing requirements.

To maintain, expand and develop our business, we need to record the personal data of prospective candidates and client contacts.

Consent:

Should we want or need to rely on consent to lawfully process your data, we will request your consent orally, by email, or through an online process for the specific activity for which we require consent, and record your response in our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this processing at any time.

Marketing for work-finding services

With your explicit consent, we may promote your profile to prospective employers as part of our recruitment services. This may include promotion via our dedicated online profiles.

What information we use

Where you have given your consent, we may include:

- Your first name
- General location (e.g. town, city or region)
- A summary of your skills, experience and career profile
- A photograph or image (where provided)

How your information is shared

Your profile may be shared with selected clients via email communications and/or hosted on a webpage that is accessible via a direct link provided in those communications.

We will only keep your promotional profile live for as long as necessary for recruitment purposes or until you withdraw your consent, whichever is sooner.

Do you have to provide us with personal data:

You may refuse to provide us with your personal and sensitive data. Furthermore, you have the right to ask us to delete, change or stop processing your data that we have already received or collected. If you do not provide us with personal or sensitive personal data, or if you request a restriction of processing, however, we may not be able to provide you with the services that you have requested and that are stated in this policy.

Disclosure of your information inside and outside of the UK:

We will disclose your personal information to third parties:

- If we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Parker Smith Inclusion or substantially all its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data to comply with any legal obligation, or to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Parker Smith Inclusion, our customers, or others. This includes

exchanging information with other companies and organisations to protect against fraud and reduce credit risk.

The lawful basis for the third-party processing will include:

- Their own legitimate interests in processing your personal data, in most cases, to fulfil their internal resourcing needs.
- Satisfaction of their contractual obligations to us as our data processor.
- For the purpose of a contract in place or in contemplation.
- To fulfil their legal obligations.

Where we store and process your personal data:

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted [using SSL technology]. Where we have given you (or you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

We use technology embedded within our recruitment systems to support administrative and operational activities. This may include features that assist with tasks such as drafting, formatting or summarising information. Supporting technology used within our business are UK GDPR compliant.

All decision-making remains human-led, and your personal data is not used in any automated decision-making or profiling.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

Retention of your data:

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate interests, and that you are happy for us to do so. We review data every 2 years to ensure that any data no longer required is erased. For safeguarding purposes, we may be required to securely hold data for longer periods.

Your rights:

You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for marketing purposes or if we intend to disclose your information to any third party for marketing purposes. We will collect express consent from you, if required by law, prior to using your personal data for marketing purposes.

You can exercise your right to accept or prevent processing for marketing purposes by checking the boxes on the forms we provide you when we collect your data. You can also exercise the right to not have your data used for marketing purposes at any time by contacting us at dpo@psinclusion.co.uk

The UK GDPR provides you with the right to:

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of your personal information, for example, if you want us to verify its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party in certain formats, if practicable.
- **Make a complaint** to a supervisory body, which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: https://ico.org.uk/concerns/.

Access to information:

The Data Protection Act 2018 and the UK GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete. Your right of access can be exercised in accordance with the Act and the UK GDPR.

A subject access request should be submitted to keya@psinclusion.co.uk. No fee will apply unless the requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character. In such circumstances, we may charge a fee or refuse to act on the request.

Cookies

We use cookies on our website. Cookies enable us to remember your preferences and help us understand how people use our website, so we can improve it. By continuing to use our website, you accept that cookies may be set on your device, as outlined in this cookies policy.

If you want to learn more about the general use of cookies, please visit Cookiepedia.

Necessary cookies

These are cookies that allow you to use different parts of our website, for example, providing a secure log-in.

Functional cookies

These help perform certain website functionalities and make your experience on our website more personal. For instance, knowing if you have been on the site before so that messages for new visitors are not displayed to you.

Analytical cookies

These are used to understand how visitors interact with our website, so we can improve the experience for users.

Third-party cookies (optional if tracking codes are used)

These are set by someone other than us; these can be things like analytics and other embedded content.

Managing Cookies

Most web browsers allow you to manage cookies. You can choose to accept or reject all cookies, or just specific types of cookies. Please note that disabling cookies may limit your use of our website.

Changes to our privacy notice:

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently for updates to our privacy notice.

Contact:

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to hello@psinclusion.co.uk

REVIEW DATES	
Author	Sophie Kelly
Version	1
Date	01/09/2023
Author	Keya McKenzie
Version	1.1
	08/02/2024
Author	Keya McKenzie
Version	1.3
Date	10/04/2024
Author	Keya McKenzie
Version	1.3 – no changes

Director Sign Off	Darragh Ryan
Date	18/07/2025
Author	Keya McKenzie
Version	1.4
Director Sign Off	Darragh Ryan
Date	11/03/2026 – amended 07/05/2026