

Midgley Consulting Ltd's Privacy Policy

Our contact details:

Name: Midgley Consulting Ltd

Address: 260 Mytchett Road, Mytchett, Camberley, GU16 6AF

Phone Number: 0203 664 0337

E-mail: info@midgleyconsulting.co.uk

Hours: 8am-6pm

Updated on 24th September 2025

The type of personal information we collect.

We currently collect and process the following information:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- The start and end date and details of any assignment you have through us.
- Client feedback.
- The dates and outcome of any client interviews you have through us.
- Location of your assignment workplace.
- Recruitment information (including copies of right to work documentation, references/referee details and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records and professional memberships, P45 and P60).
- Compensation history.
- Midgley Consulting Ltd will also collect, store and use the following "special categories" of more sensitive personal information with your consent.
 - Information about your health, including any disabilities, medical condition, health and sickness records.
- Information about criminal convictions and offences with your consent.
- IP address.

How we get the personal information and why we have it.

The following are the different sources we may collect personal data about you from:

- Directly from you. This is information you provide while searching for a new opportunity and/or during the different recruitment stages. For example, by filling in candidate registration forms in person or on our websites or by corresponding with us in person, by phone, e-mail, messaging app or otherwise. It includes information you provide when you attend our events, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, contribute to a market or insights report, or interact with us at a conference and when you report a problem with our site.

- From an agent/third party acting on your behalf. For example, this may be your own limited company.
- From suppliers or clients. For example, we may collect your name and contact details as a business contact for your organisation.
- From Dropbox Sign, our website or apps, we may collect your IP address and other data about your engagement with our website or apps, for example, the pages you view. Our Cookie Policy (available on our website at www.midgleyconsulting.co.uk) will tell you more about this.
- Through publicly available sources with professional relevance. We use the following public sources:
 - Professional social media and networking sites. (including LinkedIn)
 - Job Boards that you have registered your details on.
 - Online curriculum vitae libraries.
 - Corporate websites.
- By reference or word of mouth. For example, you may be recommended by a friend, a former employer, a former colleague or even a present employer or we may get a reference from your previous employer, or a named referee included on your application form or curriculum vitae.

We use your personal data so that we can provide our services to you, including to:

- Carry out our obligations arising from any agreements/contracts we intend to enter into or have entered into between you and us.
- Provide you with information about job vacancies and to assist you in finding a suitable position (either temporary, contract or permanent) by matching your skills, experience and education with a potential employer.
- If you work for a client or a potential client looking to fill roles, we will contact you about candidates and to share your contact details with a candidate at interview stage and subsequently.
- Maintain our business relationship, where you are a user of our website, a client or candidate.
- Provide you with recruitment services, including career guidance and management, to support the resourcing needs and strategies of businesses.
- Manage a temporary or contract assignment if you are engaged by Midgley Consulting Ltd as a temporary worker.
- Assist in managing our relationship with you and our clients and perform administration or operational functions.
- If you are a potential employee, matching your skills, experience and education or contact you about roles with Midgley Consulting Ltd.
- Share with certain third parties mentioned below.
- Record your IP address, operating system and browser type for system administration and to analyse visitor trends and traffic on our websites. This information does not identify you individually and is not normally passed to third parties. We may also use your data to ensure that content from our site is presented in the most effective manner for you and for your device, our Cookie Policy (which can be found here www.midgleyconsulting.co.uk) will tell you more about this.
- Assist in our efforts to keep our site safe and secure.
- Notify you about changes to our services or this Privacy Policy.
- Carry out market research, marketing analysis and satisfaction surveys.
- Where you have provided your contact information and opted in to marketing, we may advise you of news and industry updates, events, services, promotions and reports relevant to your career or organisation. You can unsubscribe at any time from such communications using the unsubscribe link or by contacting us at info@midgleyconsulting.co.uk.
- With your express consent, use videos or audio recordings which include your image and/ or voice where you are presenting or part of a panel discussion or where you are part of a video interview for marketing or other business purposes.

- Comply with our legal obligations and rights, under contracts and to cooperate with authorities and investigations.

Your personal data may be shared with certain third parties, where this is necessary for the purposes of providing our recruitment services, complying with our legal obligations, or where you have given consent (for example, for marketing or the processing of special category data). These third parties will be subject to contractual obligations of confidentiality and compliance with relevant laws, and may include:

- Our clients who have a position to fill, in order to determine with the client whether you are a good fit for the available position.
- The end client who you may be placed with through an intermediary such as an RPO (Recruitment Process Outsourcing) and our employees.
- HMRC, suppliers, contractors and agents who may perform services for us, such as umbrella companies, online timesheet providers, professional advisors (for example, accountants or lawyers), IT software and service companies, recruitment technology providers (e.g., CV parsing and video interview platforms) event organisers and function co-ordinators, event co-hosts, payroll and other financial service providers, credit reference agencies, compliance partners and other sub-contractors for the purpose of assessing your suitability for a role. (such as psychometric testing and reference/qualification checking)
- Third parties relating to any business sale, merger, liquidation, receivership or transfer of assets provided that they agree only to use your personal data for the purposes that you have provided it to us.
- Prospective partners, clients and other reputable third parties to disclose aggregate statistics about our site visitors and candidates in order to describe our services and for other lawful purposes. In such cases these statistics will include no personal identifying information and if required to do so by law, a court order or by a regulatory authority of competent jurisdiction or if we believe that such action is necessary to protect, defend or enforce the rights of Midgley Consulting Ltd.

You can request a list of these third parties and the purpose for sharing your data.

Midgley Consulting Ltd is processing your personal data on the basis of Midgley Consulting Ltd's legitimate interest, where necessary for the progression and performance of any resulting agreement/contract and also due to Midgley Consulting Ltd's legal obligations. Some processing may be done with your consent, in which case you will be specifically informed of this prior to the collection and processing of this data.

The legitimate interests pursued by Midgley Consulting Ltd are as follows:

- a) Collecting your personal data either directly from you or from a publicly available source for the purposes of matching your profile against suitable assignments.
- b) Managing the application, screening and selection process for suitable assignments.
- c) Providing your details to nominated third party suppliers (those mentioned above) for the purposes of pre-assignment screening.
- d) Managing any resulting temporary/contract/permanent assignment where relevant.
- e) Storing your personal data for the purpose of matching your details with potential future assignments.
- f) Contacting you by phone, email or business social media (including LinkedIn) about potential future assignments.
- g) Post-placement contact. As part of our legitimate interest in providing high quality recruitment services, we will also contact you after you have been placed in a role to check on your progress,

ensure the placement is successful, and maintain our professional relationship. You may object to this contact at any time.

We will only rely on your consent in limited circumstances, such as:

- a) When processing special category data (for example, health information, diversity data, or criminal record checks);
- b) When you agree to us retaining your CV and application details beyond our standard retention period for consideration for future roles;
- c) When you opt-in to receive marketing communications such as job alerts, newsletters or events.

You may withdraw your consent at any time by emailing info@midgleyconsulting.co.uk or calling 0203 664 0337 and this will not affect processing carried out under legitimate interest.

How we store your personal information.

Safeguarding personal data and respecting confidentiality of your information is important to Midgley Consulting Ltd.

All information you provide to us is stored securely and we take necessary steps, including putting in place appropriate technical and organisational measures, to protect your personal data.

We use JobAdder as our CRM, which may store and process data outside the UK. Where personal data is transferred internationally, we ensure that appropriate safeguards are in place in line with UK GDPR requirements.

While we have security measures in place designed to protect against the loss, misuse and alteration of personal data under our control we cannot guarantee that loss, misuse or alteration of personal data will not occur.

The Company will retain your personal data only for as long as is necessary for the purpose we collect it.

Different laws may also require us to keep different data for different periods of time. For example, the Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We are also required to retain your payroll records, including holiday pay, sick pay, and pension auto-enrolment details, for as long as legally mandated by HMRC and relevant legislation relating to the National Minimum Wage, National Insurance, and taxation. This is currently between 3 and 6 years.

Where the Company has obtained your consent to process your personal and sensitive personal data, we will do so in line with our retention policy. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease processing your personal data.

Summary of retention periods:

- Work-seeker records: At least 1 year from creation or last work-finding activity (per the Conduct Regulations).
- Payroll, holiday, sick pay, pension data: 3–6 years (per HMRC and employment legislation).

- Special category data (e.g. health, diversity): 12 months, unless further consent is granted.
- Unsuccessful candidates: 2 years from last contact, unless consent is withdrawn earlier.
- Marketing consent: Retained until withdrawn or refreshed every 2 years.

Your data protection rights.

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact info@midgleyconsulting.co.uk if you wish to make a request.

Keeping our records accurate and up to date.

Midgley Consulting Ltd will review the personal data it processes to ensure that it is up to date and accurate. Your co-operation in helping us to keep your personal data accurate by informing us of any change of name or change of address is an important part of this. If you would like to review or change the details you have supplied us with, you may do so at any time by notifying us in writing.

Changes to our Privacy Policy.

Midgley Consulting Ltd may change this Privacy Policy from time to time. If we change our Privacy Policy, we will post the changes on our website and where appropriate notify you by email. The date of issue will be indicated. We recommend that you check the terms of this Privacy Policy periodically to keep up to date with any changes.

How will we contact you?

We may contact you by phone including text, email or business social media including LinkedIn. ***If you prefer a particular contact means over another, please let us know.***

How to complain.

If you have any concerns about our use of your personal information, you can make a complaint by contacting Michelle Midgley who oversees our data protection practices at

info@midgleyconsulting.co.uk or by calling **0203 664 0337**. We will acknowledge your complaint within 24 hours and will investigate it promptly. You will receive a follow-up within one week outlining the steps we are taking to address your concerns.

You can also complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data. Website - www.ico.org.uk. Tel: 0303 123 1113.