

## 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](mailto:info@midgleyconsulting.co.uk)

**Hours:** 8am-6pm

**Updated on 8<sup>th</sup> July 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](http://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](http://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 for the possible use of our services, advise you of news and industry updates, events, services, promotions and competition reports and other information that we feel may be of interest to you because it is relevant to your career or to your organisation. Where we do this, you will be able to unsubscribe from such communications using the unsubscribe link or by contacting us at [info@midgleyconsulting.co.uk](mailto: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 (with your consent) may be shared with certain third parties who will be subject to contractual obligations of confidentiality and compliance with relevant laws, including:

- 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, 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.

In the course of processing your application, Midgley Consulting Ltd may collect (with your consent) personal data about you which is more sensitive than other data such as details about your health. Where this is done it will be for the purpose of making reasonable adjustments during the application,

sourcing and selection process. In some circumstances this data may be shared with our clients (with your consent) for the same purpose or for them to ensure that the assignment being performed would not be detrimental to your health or the health of others.

With your consent, Midgley Consulting Ltd may also collect data related to your racial and ethnic origin, religious beliefs, sexual orientation and disability status. This data will be used exclusively for the purposes of diversity assessment.

We will treat all personal data (whether sensitive or not) as private and confidential except where we are permitted or required by law to make a disclosure or where the disclosure is necessary for the purposes.

Unless Midgley Consulting Ltd is required by law, you are under no obligation to provide your personal data to Midgley Consulting Ltd for the purposes. Should you choose not to provide your personal data, or you request that Midgley Consulting Ltd delete your personal data, Midgley Consulting Ltd or our client will be unable to engage you for an assignment or employ you.

Where consent has been given by signing a consent form, you have the right to withdraw your consent at any time by emailing [info@midgleyconsulting.co.uk](mailto:info@midgleyconsulting.co.uk) or calling 0203 664 0337.

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 to process you.

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](mailto: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.

This Privacy Policy was last updated on 8<sup>th</sup> July 2025. 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.