

Privacy Policy / General Data Protection and Processing Policy

3D Recruit Ltd is committed to safeguarding privacy for everyone. We understand that providing personal and sensitive information is an act of trust and we treat your information with respect and integrity.

This policy (together with our terms of agreement and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 1998 (the "Act") and the General Data Protection Regulation 2016, the data controller is 3D Recruit Ltd, Regent House, Mitre Way, Battle, East Sussex, TN33 0BQ.

Information we may collect from you;

- Information that you provide by filling in forms or by any correspondence that you have with us, which includes information provided at the time of registering to use our services, ordering any products or services, posting any information or material or requesting further services.
- Information we ask for during the registration process to facilitate meeting the safeguarding standards requisite for APSCo Compliance+ standards.
- Information requested from time to time to maintain up to date records and Curriculum Vitae information to ensure we are providing work finding services using accurate information.
- Information that you provide when you report any problem with our services.
- Details of transactions you carry out through us and of the fulfilment of your orders.
- We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your employment. We use criminal conviction data to assess suitability for a role in line with our legal obligations.

Personal information may include the following;

- General identification and contact information: Name, address, email, telephone numbers, gender, marital status, date of birth, nationality, next of kin and emergency contact information.
- Recruitment information: Copies of identity and right to work documentation (such as passport, driving licence, utility bills, national insurance number), references, educational and professional qualifications, and other information included in a CV or as part of the application/registration process. Any copies of documents taken using a mobile device during registration will be permanently deleted from the device memory, once stored on our secure servers.

- Employment records: Job titles, work history, working hours, training records, professional memberships, bank account details, payroll records, tax status information, salary, annual leave, pension and benefits information, performance information, disciplinary and grievance information
- Other sensitive information: racial or ethnic origin, criminal record, DBS certificate information, health and disability information relevant to your work, such as any medical condition and sickness records
- Information from online searches: In line with recommendations from Keeping Children Safe in Education 2024 (Part 3, Section 226) and as part of the vetting process outlined within 3D Recruit's Safer Recruitment and Vetting Procedure, we may carry out an online search as part of our due diligence on shortlisted candidates, to help identify any incidents or issues that have happened and are publicly available online. Anything we may want to explore will be done so with the shortlisted candidate during the vetting process (see Part 2 – Legislation and the Law for information on data protection and UK GDPR, the Human Rights Act 1998 and the Equality Act 2010).

IP addresses and cookies

We may collect information about your computer, including (where available) your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

Where we store your personal data

All information you provide to us is stored on our secure servers in the United Kingdom. We adopt appropriate data collection, storage, processing practices and security measures to protect against unauthorised access, alteration and disclosure or destruction of your personal information, transactional information and data stored on our UK site.

Any personal information in hard copy form is kept securely in lockable, non-portable storage systems that are accessible only to named individuals.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Uses made of the information

We use information held about you in the following ways:

- To provide you with information, products and/or services that you request from us or, where you have consented to be contacted for such purposes, that we feel may interest you.
- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us.

- To carry out our obligations arising from any contracts entered into between us and a third party to provide information, products and work finding services expected from the third-party contract.
- To notify you about any changes to any products and/or services
- To ensure that content from our Service is provided in the most effective manner for you

Disclosure of your information

We may disclose your personal information to third parties:

- With your prior agreement
- If we are under a duty to disclose or share your personal data: (i) in order to comply with any legal obligation; (ii) in order to enforce or apply our terms of agreement or any contracts formed through us for the supply of our work finding services; or (iii) in order to protect the rights, property or safety of 3D Recruit Ltd, our customers or others. This includes exchanging information with other companies and organisations for the purposes of promoting safe recruitment, fraud protection and credit risk reduction
- If there is an allegation made against you
- To include external agents for the purposes of company audits, which form part of our membership and contractual requirements with the Association of Professional Staffing Companies (APSCo), and accreditation to Compliance Plus (such as APSCo auditors)

Your rights

We do not intend to process personal data collected from you for marketing purposes. If we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes, we will obtain your prior agreement.

Our communications may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

You have the right to lodge a complaint with the supervisory authority, which in the UK is the Information Commissioner's Office (ICO). The ICO can be contacted via: <https://ico.org.uk/concerns/>

How long your data is held

We do not keep personal information for any longer than is necessary to provide you with a work finding service. Registration documents you have provided will be kept whilst we are actively providing a work finding service and for two years after we have stopped providing a service.

We will contact you from time to time during the two years we are not actively seeking work for you to ensure our records remain up to date and to alert you to any suitable opportunities.

We retain DBS and screening data which will be retained for a maximum of one year. This is to allow for the resolution of any disputes and complaints. If an allegation has been made against you, this information (including the outcome of the investigation) will be retained for several years once the investigation has concluded. For further information on specific records retention periods please refer to the separate 3D Recruit Records Retention and Destruction Policy.

During the retention period, all data is stored on our secure servers in the United Kingdom, or in securely locked, non-portable storage systems. Once the retention period has elapsed, personal information is immediately destroyed in a secure manner; we will not retain an electronic or hard copy of personal information.

The Companies Act 2006 states that private limited companies must keep accounting records for 3 years from the date they are made. In addition, UK tax law requires private companies to retain any records that are used for the purposes of completing tax returns for 6 years from the end of the accounting period to which the records relate. We will keep the relevant financial records for 6 years.

The rights of Data Subjects

The Act gives data subjects wider rights of access and control of their personal data. Data subjects have the right for their data to be removed if the data is no longer required, where consent is withdrawn or if the processing is unlawful. You have the right to access all of the personal information held about you. Your right of access can be exercised in accordance with the Act. 3D Recruit will provide access to your data within 30 days of the request being made.

We do not intend to process personal data collected from you for marketing purposes. If we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes, we will obtain your prior agreement.

Our communications may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be notified to you by e-mail.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to compliance@3drecruit.com or by writing to us at the following address:
3D Recruit, Regent House, Mitre Way, Battle, East Sussex, TN33 0BQ

Privacy Policy / Data Protection and Processing Policy - Review Dates:

Version	Review Date	Review By	Changes / Amendments	Next Review Date
v.1	May 2014	Rachel Power, Safeguarding Manager	No changes	May 2015
v.1	May 2015	Rachel Power, Safeguarding Manager	No changes	May 2016
v.1	May 2016	Rachel Power, Safeguarding Manager	No changes	May 2017
v.1	May 2017	Rachel Power, Safeguarding Manager	No changes	May 2018
v.2	May 2018	Ben Arnold, Managing Director	Replaces Data Protection/Access to Personal Files Policy. GDPR changes incorporated.	May 2019
v.2	May 2019	Rachel Power, Safeguarding Manager	No changes	May 2020
v.2	May 2020	Rachel Power, Safeguarding Manager	No changes	May 2021
v.May-21	May 2021	Rachel Power, Safeguarding Manager	Additions to 'Disclosure of Information' section – to include external agents / APSCo auditors, and the disclosure of allegations. Reference to a retention period for Allegations, Investigations and Outcomes in the 'How long your data is held' section.	May 2022
v.May-22	May 2022	Rachel Power, Safeguarding Manager	No changes	May 2023
v.May-23	May 2023	Rachel Power, Safeguarding Manager	No changes	May 2024
v.Oct-23	Oct 2023	Rachel Power, Safeguarding Manager	Addition of online searches, in line with recommendations from KCSIE 2023	Oct 2024
v.Oct-24	Oct 2024	Rachel Power, Safeguarding Manager	No changes	Oct 2025
v.May-25	May 2025	Rachel Power, Safeguarding Manager	Amendment to online searches – reference to KCSIE 2024	May 2026