

# Privacy Notice

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First Recruitment Group is committed to protecting and respecting your privacy.

This privacy notice explains how we use any personal data we collect about you.

## Who are we?

First Recruitment Group is the trading name of First Technical Recruitment Ltd, a global recruitment agency specialising in the Aerospace, Chemicals, Commercial and Defence, Energy, Infrastructure, Manufacturing and Technology sectors.

Our global headquarters is at Parry House, Birchwood Boulevard, Warrington, Cheshire, United Kingdom, and our telephone contact number is +44 (0)1925 907000.

## Why do we collect your data?

We collect your personal data to help us find you a temporary, contract or permanent position at one of our clients. We also collect personal data from contractors whom we don't recruit but are payrolled via First Recruitment Group; these are known as client-named candidates where we receive personal data direct from the client.

## What sort of data do we collect?

We collect information such as your name, address, e-mail address, work and education history. In other words, the information generally contained in your CV. We will only collect and store information which is relevant to finding you a position at one of our clients. Once you are placed at a client this and other relevant information such as your bank details etc. will then be used to pay you. We will also collect compliance documentation and references verifying your qualifications and experience and your right to work in the United Kingdom.

Note our recruitment database is shared by group companies; your information is only used where we believe there is a genuine match for a role with one of our clients. In all instances we will contact you beforehand to discuss the opportunity. This will include client-named candidates once they become available.

Also note that if you choose to use our group in-house payroll solution: **Primis** then we may share relevant data with them.

Also, if we recognise that other services offered by the group may be advantageous, then again, you may be contacted to share these services with you. You can always unsubscribe from these.

We collect information about you when you voluntarily complete our website newsletter subscription form, competition entries or market intelligence surveys. If you have opted-in to receive future emails from us via these methods, you can opt-out or unsubscribe from them at any time by using the unsubscribe button at the bottom of the email.

Please note that, as advised, you can unsubscribe from our emails and alerts at any time, but this doesn't act as a formal deletion request, and we may still retain your details in our database for the purposes described in this Privacy Notice.

We also record phone calls for quality assurance, compliance, and dispute resolution purposes. We securely hold these recordings for 90 days. The recordings are then automatically deleted.

Finally, personal data may be used for a very different purpose for which it was originally collected, for example when we may disclose personal data for crime prevention.

### **Do we collect and use sensitive personal data?**

Yes, we do but only in certain circumstances and only with your consent if it is sensitive data. In addition, our clients in security conscious sectors such as nuclear and oil & gas require us to collect specific additional information. In such cases we will always consult with you before forwarding these details to the client. Information they require may include, but not be restricted to:

- Drugs and alcohol results
- Address details for the last five years
- Emergency contact details
- Proof of current address/ bank statement or utility bill
- Employment references
- Personal references
- Criminal Record Declaration
- DBS Checks
- Police checks
- Credit card/ Account statements
- Security clearance evidence

### **How do we collect your data?**

There are various methods we use to find the right candidates: Through you registering on our website, responding to one of our job advertisements, via a referral or through direct contact with our consultants. We may also have found your data through CV search software. This method searches publicly accessible, and company approved job boards where you will have placed your CV. We may also collect your data direct from clients whom we don't recruit but are payrolled by us i.e. client-named candidates.

Automated Decision-Making: all use of AI regarding personal data is proportional and safeguarded in-line with the company *Ethical & Acceptable Use of Artificial Intelligence (AI) Policy*.

### **What do we do once we have got your data?**

Wherever your data originates from, your data will only be used to find you a position with one of our clients. We will contact you every time we would like to submit your details to a client. We may use your data to send you emails with new job alerts relevant to the industry and area you work within. Note this activity by us will apply to client-named candidates only when their assignment is complete, i.e. they are available to be considered for other placements. You can opt-out or unsubscribe from receiving these job alerts at any time by using the unsubscribe button at the bottom of the email.

## **What are Cookies and how do we use them?**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of our website and to complete statistical reports on website activity.

You can set your browser not to accept cookies, and you can also remove cookies from your browser. However please note that some of our website features may not function as a result.

For further information please see our cookie policy or visit: [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)

## **Other data collected from our website**

We also collect information in the aggregate to provide us with a better understanding of the users of our website; this information does not contain personally identifiable information.

## **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 you or to your organisation.

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 businesses' resourcing needs and strategies.

Our legal basis for the processing of personal data is our legitimate business interests, described in more detail below, although we will also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract 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 if we are legally required to hold information on you to fulfil our legal obligations.

We will in some circumstances rely on consent for particular uses of your data and you will be asked for your explicit consent.

## **Our Legitimate Business Interests**

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

As a recruitment business 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 contacts is a fundamental, essential part of this process.

In order to support our candidates' aspirations and our clients' resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements.

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

#### **Recognised Legitimate Interests**

Further lawful grounds for processing personal data include crime prevention, safeguarding vulnerable people, responding to emergencies, safeguarding national security or assisting other bodies deliver public interest tasks that are sanctioned by law.

#### **Consent**

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

#### **Do we pass your data to third parties?**

Yes we do – for example If we find you a position at a client and you are operating as a contractor our internal payroll and finance departments will then hold and process relevant elements of your data for their purposes. In addition, appropriate data will be sent to our appointed pension provider on your behalf. You may also nominate an umbrella or accountancy company from our validated and legislation compliant preferred list to pay you. In such cases we will provide relevant data to them for payment purposes. Note that if you choose to use our group in-house payroll solution: **Primis** then we may share relevant data with them.

If you have a limited company, we may share relevant information with our preferred insurance provider with your consent. In these instances, they will review the information to ensure that limited company contractors hold valid sufficient insurances.

We will also share relevant data regarding your assignment with clients from time-to-time.

#### **Do we transfer your data outside the EEA and what are the safeguards?**

We have clients, supported by group offices, based outside the EEA therefore potentially yes if we consider you to be of interest to one of these clients. We will always seek your explicit consent to send your details outside of the EEA and continue to act reasonably and proportionally when considering whether data protection tests are met.

For our emails and surveys, we use an online survey cloud-based software tool, and an email marketing service. Both of these companies are based in the USA. Both these companies are compliant with current data protection regulations.

However, if you wish you can opt-out or unsubscribe from our surveys or emails at any time by using the unsubscribe button at the bottom of the survey email you have been sent.

## How long do we keep your data?

Our retention policy is driven by the recognition that our market sectors often require experienced support for long-term projects and that engineering, technical and professional candidates are a valuable yet finite resource.

## What are your rights under the General Data Protection Regulation (GDPR)?

### ▪ Right of Access

You can access the data we hold about you at any time. Upon your request we will send a copy of the information we hold on you free-of-charge and within one month of receipt of your request.

### ▪ Right to Rectification

You can request correction of any data that we hold about you at any time. We will correct the information within one month of receipt of your request.

### ▪ Right to Erasure/Right-to-be –Forgotten

You can request that we remove/delete your information at any time. This includes data provided by us to third parties as previously described. However if we have previously placed you at a client then some of your information may be required to be kept for a certain period of time after your request. In these circumstances we will explain this to you.

### ▪ Right to Data Portability

You can collect and re-use your data at any time.

### ▪ Right to Object

You may object to the processing of your data based on our legitimate interests. In such cases we may need to demonstrate to you that our legitimate interests are sufficiently compelling to override your interests and rights, or, that purpose is to establish or defend legal claims.

You can also object to direct marketing or the use of your data for the purposes of profiling or research. Note in these instances we will always offer an unsubscribe option within the email that you are sent, or you can reply to the email to say that you no longer wish to be contacted.

### ▪ Right to Restrict Processing

You can request at any time that we store your data but not process any further.

- **Right to make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner's Office (ICO).

**How to contact us:**

If you wish to exercise your rights or make a complaint to us please contact us at:  
[data.manager@firstrg.com](mailto:data.manager@firstrg.com)

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|----------------------------------------|---------------------------------------|-------------------------------|
| Policy Area: <b>Compliance</b>         | Version: <b>7.4</b>                   | Approved Date: <b>09/2026</b> |
| Title of Policy: <b>Privacy Notice</b> | Approved By: <b>Managing Director</b> |                               |