

UK PRIVACY NOTICE

This Privacy Notice explains how Kind Consultancy Limited (“**Kind Consultancy**”, “**we**”, “**us**”, “**our**”) collects, uses and protects personal data in the **United Kingdom**.

We are a specialist **recruitment agency and recruitment business** as defined in the *Employment Agencies and Employment Businesses Regulations 2003*. We also provide related consultancy, outsourcing and training services within the UK market.

We take your privacy extremely seriously and are committed to complying with all applicable UK data protection laws, including the:

- **UK General Data Protection Regulation (UK GDPR)**
- **Data Protection Act 2018**
- **Privacy and Electronic Communications Regulations (PECR)**

Please read this Notice carefully to understand how we process your personal data.

1. Who we are

Our company is **Kind Consultancy Limited**, registered in England and Wales (company number **08065412**) with our registered office at Fourth Floor St James House, St James' Square, Cheltenham, Gloucestershire, GL50 3PR, United Kingdom.

Data Protection Contact:

Email: mat@kindconsultancy.com

We act as **Data Controller** for the personal data processed through our UK website and UK recruitment operations.

2. Who this Notice applies to

We collect and process the personal data of the following categories of people:

- **Prospective, current and placed candidates** (permanent, contract, interim)
- **Prospective and existing client contacts**
- **Supplier and vendor contacts**
- **Website visitors**
- **Employees, consultants and temporary workers.**

3. The Personal Data We Collect

Personal data means the information about an individual from which you, or a third party, can be identified. Depending on your relationship with us, we may collect the following categories of data:

A. Identity Data

Name, previous names, date of birth, gender, job title, right-to-work documentation, professional profiles (LinkedIn, CV libraries).

B. Contact Data

Postal address, email address, telephone numbers.

C. Recruitment & Professional Data

CVs, work history, education details, qualifications, skills, compliance and reference information, information provided during interviews or screening.

D. Technical & Website Data

IP address, browser type, device information, website usage data, cookie preferences.

E. Financial & Transaction Data

Payment information *only if* you purchase services from us (rare for candidates).

F. Communications Data

Emails, telephone call notes, messages and any information voluntarily provided.

4. Special Category Data

We do **not** routinely collect special category data. However, on occasion, we may process:

- health-related information (e.g. reasonable adjustments)
- diversity-related information (if voluntarily provided)

We will only process such data where:

- it is **necessary** for employment law obligations;
- or we have obtained your **explicit consent**;
- or another valid UK GDPR Article 9 condition applies.

We do **not** require you to provide special category data unless necessary.

5. How we Collect your Personal Data

We collect data in the following ways:

- when you submit a CV or respond to a job advertisement

- when you register on our website or join our talent database
- from LinkedIn or other publicly available professional sources
- via referrals, past employers or referees (with your knowledge)
- when you communicate with us via email, phone or forms on our website
- through our website cookies and analytics tools (find the full Cookies policy at <https://www.kindconsultancy.com/privacy-policy/#cookies>)

6. How we Use your Personal Data

We use your personal data for legitimate business purposes including:

A. Recruitment Activities

- assessing suitability for roles
- matching you to relevant opportunities
- introducing candidates to clients
- maintaining our candidate database

B. Client Relationship Management

- managing ongoing assignments
- keeping in touch regarding market information
- providing consultancy services

C. Website and Service Administration

- improving user experience
- ensuring site security
- managing cookie preferences (UK PECR)

D. Legal and Regulatory Compliance

- confirming right-to-work
- complying with tax and audit obligations
- responding to regulatory enquiries

E: Use of Technology, Analytics and AI Tools

We may use technology-assisted tools, including AI-enabled search, matching or analytics solutions, to support our recruitment and business operations. These tools may help us identify suitable opportunities for candidates, analyse skills against role requirements, and streamline internal workflows.

Whenever we use AI-based tools, we ensure that:

- **AI does not make solely automated decisions that produce legal or similarly significant effects on individuals.** Any recommendation or matching output is always reviewed by a trained member of our team.
- Only the minimum personal data necessary is used for the specific function.
- All processing remains **fully compliant** with the UK GDPR, including fairness, transparency and data-minimisation principles.
- We carry out an internal assessment of any AI solution prior to use, evaluating privacy, accuracy, fairness, and security considerations.

Some of the technology we use may generate insights or improve its functionality using **fully anonymised or aggregated data**. Where data has been anonymised such that no individual can be identified, it is no longer considered personal data under UK GDPR and may be retained and used to train, refine or support the performance of our AI tools or analytical systems. This does **not** affect your privacy rights and has no impact on you as an identifiable person

7. Our Legal Bases for Processing

We rely on the following legal bases:

Legitimate Interests

Recruitment businesses rely heavily on legitimate interests to process candidate and client data where the impact on the individual is minimal and the processing reasonably expected.

Contract

Where we need your data to perform a contract with you (e.g., employment, consultancy).

Consent

This is used only where required (e.g., for marketing communications). You may withdraw consent at any time.

Legal Obligation

For right-to-work checks, financial reporting and other statutory duties.

8. Sharing your Personal Data

We may share your personal data with:

- prospective or existing clients (only with your knowledge)
- third-party suppliers (e.g., CRM provider, IT support)
- professional advisers
- regulators or authorities only where legally required

We do **not** share your data for marketing by third parties.

9. International Transfers (including the US)

Although this is the **UK Privacy Notice**, we may transfer limited personal data outside the UK, including to the United States because:

- our CRM or email systems may involve US-based service providers
- some prospective clients or business contacts are located outside the UK.

To ensure safe transfers, we use:

- the **UK–US Data Bridge** (if the US partner is certified); or
- an **International Data Transfer Agreement (IDTA)**, (see the UK regulator ICO website), or
- **UK Addendum to EU Standard Contractual Clauses**, where required.

10. Data Retention

We retain data only as long as necessary for recruitment and business purposes.

Typical retention periods:

- Candidate data: **up to 6 years** after last meaningful contact
- Client contact data: **up to 6 years**
- Financial records: **6 years** (statutory requirement)

We may retain anonymised data indefinitely.

11. Your Rights

Under UK GDPR, you have the right to:

- access your personal data
- request correction of inaccurate data
- request deletion
- restrict processing
- object to processing based on legitimate interests
- request data portability
- withdraw consent (where applicable)

To exercise your rights, contact: mat@kindconsultancy.com

12. Cookies and Privacy and Electronic Communications Regulations (PECR)

Our UK website uses cookies. Under PECR:

- **essential cookies** may be used without consent
- **analytics / marketing cookies require opt-in consent**

See our full Cookie Policy (<https://www.kindconsultancy.com/privacy-policy/#cookies>) for details.

13. Security

We take appropriate technical and organisational measures to protect your data, including:

- access controls
- encrypted storage
- secure disposal practices
- staff confidentiality obligations

14. Changes to this Notice

We may update this Notice from time to time. The latest version will always be published on our UK website.

15. Contact Us

If you have any questions about this Notice, contact:

Data Protection Contact

Kind Consultancy Limited

Email: mat@kindconsultancy.com

May 2026