Privacy Notice

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Proposed public policy wording for review. This revision does not replace the issued policy until approval and publication are recorded.

Privacy Notice

This Privacy Notice explains how Ignite Talent Group Ltd and its group companies process personal data through recruitment activity, websites, client relationships, worker supply, candidate registration, business development and group governance.

Purpose

This notice provides transparency to candidates, workers, clients, suppliers, website users and other contacts.

It should be read together with Ignite's Data Protection Statement (IG-POL-003), Information Security Policy (IG-POL-013), and any candidate registration forms, assignment documents, client terms or specific privacy information issued by Ignite. This notice does not replace recruitment terms, a Key Information Document or an assignment confirmation.

Scope

This notice applies to the website and to personal data processed by Ignite Talent Group Ltd and relevant group companies for recruitment, labour supply, business, compliance and governance purposes.

Policy commitments

- Be transparent about how personal data is used.
- Use personal data for recruitment, labour supply, client delivery, compliance, business administration and legal obligations.
- Protect personal data with appropriate organisational and technical measures.
- Share personal data only where lawful and proportionate.
- Respect individual rights under data protection law.

Responsibilities

Directors and senior leaders

- Set the policy direction, provide resources, and maintain accountability for the governance framework.
- Ensure material risks are reviewed and that controls remain proportionate to the size, risk profile and vertical activity of the group.

Managers and consultants

- Apply the policy in day-to-day recruitment, client, candidate and worker interactions.
- Keep records accurate and escalate gaps, concerns or client requirements promptly.

Employees, workers and representatives

- Act honestly, follow approved processes, protect confidential information and report concerns without delay.

How this policy is applied

Who we are

Ignite Talent Group Ltd (company number 16657250) is the controller for the group website and group governance processing. A controller decides why and how personal data is used. The relevant trading company is responsible for its own recruitment processing where it makes those decisions.

Ignite Construction Talent Ltd has company number 17027902. The registered office of both that company and Ignite Talent Group Ltd is C/O Burton Varley Ltd, The Counting House, 24 Richmond Road, Bowdon, Altrincham, England, WA14 2TT.

The group companies and their ICO registration references are:

- Ignite Talent Group Ltd — ZC135847.
- Ignite Construction Talent Ltd — ZC135852.
- Ignite Engineering Talent Ltd — ZC135854.
- Ignite Legal Ltd — ZC135858.
- Ignite Tech Talent Ltd — ZC135860.
- Ignite Sales Ltd — ZC173466.

For any of these companies, contact dataprotection@ignitetalentgroup.co.uk. You may also write to the Data Protection Contact, Ignite Talent Group Ltd, at the address above. The relevant company should be identified in your recruitment, assignment or contract information; contact us if you need help identifying it. Group membership does not automatically make every company a joint controller.

Data we collect

Depending on your relationship with us, we may collect names, contact details, CVs, employment history, qualifications, right-to-work evidence, training certificates, availability, pay expectations, references, communications, client contact details and compliance records. Worker payment details are collected where needed for an engagement or payment arrangement.

We obtain information directly from you and, where relevant to the service, from clients, hirers, referees, job platforms, professional profiles or verification providers. Where information comes from another source, we explain the source and relevant processing when we contact you or otherwise provide the required notice.

We explain when information is required by law or to enter into or perform an agreement, and the consequences of not providing it. For example, without a required identity or right-to-work check an assignment may not be able to proceed. Optional information is identified as such.

Special category data, such as health information for adjustments, and criminal record data are used only where necessary and legally permitted. We must identify the relevant additional legal condition as well as a lawful basis, and give specific information about any such checks.

Website information and contact routes

The current website does not load Google Analytics, Google Tag Manager, advertising scripts, third-party analytics, or JobAdder integrations/forms. Contacting Ignite separately by email or telephone, or through a separate recruitment service, may still involve processing your personal data. Absence of a website integration does not mean that recruitment systems are not used elsewhere in the business.

Hosting and security services may process technical connection information, such as an IP address, requested page, browser information and access time, to deliver and protect the website. This is separate from advertising or visitor-tracking analytics. Our Cookie Policy explains the distinction and how website changes are controlled.

How we use data

We use data to register candidates, assess suitability, introduce candidates to clients, manage assignments, pay workers where applicable, meet legal duties, respond to enquiries, maintain business relationships and protect the business. The lawful basis depends on the specific purpose:

- Recruitment matching, introductions and service enquiries: legitimate interests in providing recruitment services, helping candidates find suitable work and helping clients recruit. We assess necessity and balance those interests against your rights.
- Agreements directly with you: contract, where processing is necessary to take steps at your request before a contract or to perform that contract. A contract with your employer or a client is not, by itself, a contract with you.
- Mandatory employment, right-to-work, tax, payment and regulatory records: legal obligation, where a specific legal duty applies to Ignite.
- Client and supplier contacts, service administration, system security, complaints and legal claims: legitimate interests in operating and protecting the business, with legal obligation used where a particular duty requires the processing.
- Optional processing for which we request your agreement: consent for the identified purpose. Consent is not a condition of unrelated recruitment services and may be withdrawn.

- Business development: legitimate interests where applicable and consent where required for the communication concerned. Electronic marketing must also comply with the applicable marketing rules. You may object to direct marketing at any time.

Sharing and service providers

Where necessary and lawful, we share relevant information with clients and hirers, payroll providers, umbrella companies, verification providers, professional advisers, regulators and technology providers supporting our recruitment, communications, hosting or security. Access within the group must have a defined purpose and be limited to what is needed; it is not unrestricted access for every group company.

A service provider acting on our instructions must be covered by appropriate data-processing terms. Clients, hirers or other recipients may be separate controllers for their own processing and may provide their own privacy information.

International processing

Some technology services may involve processing or access outside the UK. Any restricted transfer must be covered by an applicable UK adequacy arrangement or another permitted transfer mechanism and the necessary safeguards. You can ask dataprotection@ignitetalentgroup.co.uk for the relevant destination and safeguard details, including a copy or explanation of the safeguards applicable to your information.

Automated processing

Any use of solely automated processing to make a decision with legal or similarly significant effects requires specific information about the process, its consequences and the applicable safeguards, including a route to make representations, contest a decision and obtain human intervention. This general notice does not itself authorise new automated recruitment decision-making.

Retention

We retain personal data only for a necessary and proportionate period. Retention depends on the purpose and record type rather than a single period for all information. We use the following criteria:

- Candidate records: whether an application or assignment remains active, the relevance of the information to current recruitment activity, our last meaningful contact, your stated preferences, and any necessary compliance or claims record.
- Worker, payment and compliance records: the applicable statutory retention requirements, the end of the engagement or relevant transaction, and any continuing legal, accounting or regulatory need.
- Client, supplier and enquiry records: the duration of the relationship, whether the enquiry has been resolved, contractual or accounting requirements and any relevant dispute or claims period.
- Technical and security records: the period needed to operate the service, investigate relevant faults or incidents and comply with applicable legal requirements, taking account of the provider configuration.

We review records and delete or anonymise information that is no longer needed. Where we must keep information for a legal hold, obligation or claim, we limit its use and access accordingly. A minimal suppression record may be retained to honour a marketing objection. Contact dataprotection@ignitetalentgroup.co.uk for the period or criteria applying to a particular record.

Rights and contact

Depending on the processing and applicable law, you may request access, correction, erasure, restriction or portability of your personal data. These rights are not absolute; we will explain any applicable restriction.

Your right to object

You may object to processing based on legitimate interests for reasons relating to your situation. You may object to direct marketing at any time, including profiling related to that marketing, and we will stop using your information for that purpose.

Withdrawing consent

Where we rely on consent, you may withdraw it at any time by contacting dataprotection@ignitetalentgroup.co.uk or using the withdrawal method provided when consent was requested. Withdrawal does not affect processing that was lawful before it was withdrawn.

Making a request

For questions about how we use your personal information, or to exercise your data-protection rights, please contact dataprotection@ignitetalentgroup.co.uk. You may also write to the Data Protection Contact at the address in “Who we are”.

We respond without undue delay and normally within one calendar month, subject to any lawful extension or pause. We may need proportionate identity checks or clarification and will explain any effect on timing. We do not normally charge for rights requests; any lawful exception will be explained.

Records and evidence retained

- Privacy notice version history.
- ICO registration records.
- Subject access request logs.
- Data breach records.
- Data sharing and processor records.
- Retention schedule.

Reporting concerns

To raise a data-protection complaint, email dataprotection@ignitetalentgroup.co.uk, write to the Data Protection Contact at the address above, or raise it by telephone or through your usual Ignite contact. Explain what happened, when it happened and the outcome you are seeking, where possible. There is no charge to raise a complaint. A complaint received through another Ignite contact will be routed to the appropriate person.

In line with our Complaints Policy (IG-POL-009), we aim to acknowledge complaints within five working days and will acknowledge a data-protection complaint no later than 30 days after receipt. We will investigate appropriately and communicate the outcome without undue delay, normally aiming to provide a substantive response within 20 working days where practicable. We will keep you informed if more time is needed. These complaint-handling targets do not replace the separate legal timescales for a data-rights request.

You also have the right to complain to the Information Commissioner’s Office (ICO), the UK data-protection regulator. See https://ico.org.uk/make-a-complaint/ or telephone 0303 123 1113. The ICO normally expects you to raise the concern with the organisation first.

General compliance matters may still be sent to compliance@ignitetalentgroup.co.uk. Concerns about wrongdoing may also be raised under the Whistleblowing and Speak-Up Policy. These routes do not remove your data-protection rights.

Approval and review

Status	Approved
Approval authority	Nicholas Ryan, Director
For and on behalf of	Ignite Talent Group Ltd
Approval date	Not yet recorded
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