

Privacy Policy (UK)

Recruitment Business – UK GDPR & DPA 2018

1.0 Introduction

Orion Group (“Orion”) is committed to protecting your privacy. This policy explains:

- What personal data we collect;
- How we use it;
- Your rights; and
- How to contact us regarding your data.

Orion is the data controller for the information you provide, unless otherwise stated.

This policy applies to:

- Candidates and job applicants;
- Orion staff;
- Clients and business contacts; and
- Visitors to our websites or apps.

We process your data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

2.0 What Personal Data We Collect

We collect only the information necessary to provide our services, which may include:

Candidates & Job Applicants

- Identity: name, date of birth, photograph;
- Contact details: email, phone, postal address;
- CV and employment history;
- Qualifications, training, and professional affiliations;
- Right to work information (passport, visa, work permit);
- Criminal record checks where required;
- Emergency contacts and next of kin;
- Banking and payroll information for paid assignments;
- Health or medical information for occupational or mobility requirements.

Clients and Business Contacts

- Name, job title, and professional contact details;
- Company information;
- Correspondence and notes relevant to recruitment services;
- Billing and financial details.
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Website & App Users

- IP addresses and browser/device information;
- Cookies and analytics data;
- Correspondence or survey responses submitted online.



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3.0 How We Use Your Data

We process your data based on one or more lawful bases:

Purpose	Lawful Basis	Examples
Providing work-finding services	Contractual necessity / legitimate interest	Assessing suitability for assignments, managing applications
HR and staff management	Contractual / legal obligation	Payroll, benefits, training, performance management
Legal, regulatory, and compliance	Legal obligation	Right-to-work checks, criminal record checks, tax, immigration
Marketing (if consent given)	Consent	Optional newsletters, job alerts
Improving our services	Legitimate interest	Feedback surveys, service quality reviews

Legitimate interests are only relied upon where your rights are not overridden.

We do not sell your data to third-party marketing organisations.

4.0 Sharing Your Data

Orion may share your data with:

- Clients: when representing you for an assignment (with your prior agreement);
- Third-party service providers: payroll bureaus, IT providers, insurers, medical or visa services;
- Regulatory or statutory authorities: tax authorities, border agencies, auditors;
- Referees and educational/professional institutions: for verification purposes.

All third-party processors are contractually bound to comply with UK GDPR and use your data only as instructed by Orion.

5.0 International Transfers

Some of Orion's operations are outside the European Economic Area (EEA).

Where personal data is transferred internationally, we ensure appropriate safeguards such as:

- UK adequacy decisions;
- Standard Contractual Clauses (SCCs);
- Other legally approved transfer mechanisms.

6.0 Data Retention

We retain your personal data only as long as necessary for:

- The provision of recruitment or employment services;
- Legal or regulatory obligations; or
- Legitimate business purposes.

Typical retention periods:



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Data Type	Retention Period
Candidate/job application data	6 years from last contact (unless consented for longer)
Staff employment data	Duration of employment + statutory retention period (varies by document type)
Client contact data	6 years from last engagement
Website analytics & cookies	12 months unless anonymised

7.0 Your Rights

Under the UK GDPR, you have the right to:

1. Access – request a copy of your personal data;
2. Rectification – correct inaccuracies;
3. Erasure – request deletion where no lawful reason exists to retain it;
4. Restriction – limit processing in certain circumstances;
5. Data portability – receive your data in a structured, machine-readable format;
6. Object – withdraw consent or object to processing under legitimate interests;
7. Automated decision-making – object to profiling or automated decisions.

Requests will normally be responded to within 1 month, extendable by 2 months for complex requests.
Request forms and guidance:

- SAR form: <https://www.orionjobs.com/subject-access-request-form/>
- Right to Object form: <https://www.orionjobs.com/right-to-be-forgotten/>

8.0 Website & Cookies

Orion websites may use cookies to:

- Enhance user experience;
- Analyse site usage;
- Remember your preferences.

Most browsers allow you to control or block cookies. For detailed guidance, see our Cookie Policy [link].

9.0 Security

We implement appropriate technical and organisational measures to protect your data against:

- Unauthorised access or disclosure;
- Accidental loss, alteration, or destruction.

Access to personal data is limited to staff who need it for legitimate business purposes.

10.0 Complaints

If you have any concerns about how Orion processes your personal data:

1. Contact Orion at marketing@orioneng.com (Attention: Data Protection Officer);
2. If unresolved, you may contact the Information Commissioner's Office (ICO):
 - Website: <https://ico.org.uk> / Tel: 0303 123 1113