

Company Name:	Tiger Recruitment Limited ('the Company')
Company Contact details:	compliance@tiger-recruitment.co.uk
Document:	Privacy Policy and Cookies Policy
Topic:	Data protection
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The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including special categories of personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you, we will only use your personal data in accordance with this privacy statement. We will comply with current data protection laws at all times.

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1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company will collect your personal data (which may include special categories of personal data) and will process your personal data for the purposes of providing you with work-finding services. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

If you have opted-in we may also send you marketing information and news via email/text. You can opt-out from receiving these at any time by clicking “unsubscribe” when you receive these communications from us.

On some occasions we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

- Your consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you

b. Legitimate interest

This is where the Company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Managing our database and keeping work-seeker records up to date;
- Providing work-finding services to you and our clients;
- Contacting you to seek your consent where we need it;
- Giving you information about similar products or services to those that you will have used from us recently;
- To assess data against vacancies the Company judge may be suitable for you;
- To send your information to clients so they can receive your application or assess your eligibility for jobs;
- To enable you to submit your CV or apply for jobs;
- To improve the Company’s service and to make the Company’s services more relevant to you (including updating the Company’s website to enhance your digital experience);
- Where you have consented to being contacted, send you promotions, offers, networking events and market information;
- To answer your queries;
- To carry out our obligations arising from any contracts entered into between you and the Company, or any contracts the Company enters into with third parties in relation to providing you recruitment services;
- To facilitate the Company’s payroll and invoicing processes;
- To third parties that undertake references, qualifications and criminal reference checking services, the verification of the details you have provided from a third-party source, psychometric or skills evaluation;

To third parties, regulatory or law enforcement bodies if the Company believes that they are required to disclose it in connection with a crime, the collection of taxes/duties, or in order to observe an applicable law or legal proceedings

c. Statutory/contractual requirement

The Company has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some

circumstances safeguarding requirements). Our clients may require this personal data, and we may need your data to enter into a contract with you. If you do not give us the personal data we need to collect in order to comply with our statutory and legal requirements, we may not be able to continue to provide work-finding services to you.

d. Recipient/s of data

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Clients (who we may introduce or supply you to)
- Payroll service providers who manage payroll on our behalf or other payment intermediaries who we may introduce you to
- Other recruitment agencies in the supply chain
- Auditors who are assessing the compliance and processes of the business to ensure its adherence to all relevant legislation and good practice guidance
- Any of the Company's branches;
- Third parties who require reference information relating to your past or future employment;
- Third party services providers who supply processing services or perform functions on the Company's behalf;
- Outsourced IT and document storage providers that the Company has entered into contractual agreements with;
- Marketing technology suppliers and platforms;
- MSP and RPO suppliers, where the Company's clients utilise these suppliers.
- Our service providers, suppliers, agents and representatives, including but not limited to, payment processors, customer support, email service providers, event venues and service providers, IT service providers, marketing service providers, research providers, mailing houses and shipping agents.

2. Information to be provided when data collected not from the data subject

Categories of data: The Company has collected the following personal data on you:

Personal data:

- Name, address, mobile no., email
- National insurance no.
- Nationality (through right to work check)
- [Specify any other data...]

Source of the personal data: The Company sourced your personal data/special categories of personal data:

- From jobs boards, LinkedIn and company websites
- A former employer
- A referee whose details you previously provided to us
- Cookies listed in section 7

This information came from a publicly accessible source.

3. Overseas Transfers

The Company may transfer the information you provide to us to countries outside the UK and/or the European Economic Area ('EEA') for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

4. Data retention

The Company will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time. For example, the Conduct of Employment Agencies and

Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services. We are required to keep your records relating to the right to work in the UK 2 years after employment or the engagement has ended alterable and working time records including your 48 hour opt out notice annual leave/holiday records 2 years from the time they were created.

Additionally, we must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation. This is currently 3 to 6 years.

Where the Company has obtained your consent to process your sensitive personal data, we will do so in line with our retention policy (a copy of which is available on our website). Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal data/sensitive personal data.

In addition to our obligations under the Conduct of Employment Agencies and Employment Businesses Regulations 2003, the Company will delete your personal data after three years if we have not had any meaningful contact with you or if we do not hold any records on you that are in our legitimate interests to keep.

“Meaningful contact” means, for example, any form of contact between us in relation to the Company assisting/providing recruitment services to you.

5. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your sensitive personal data you have the right to withdraw that consent at any time by contacting compliance@tiger-recruitment.co.uk. Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where the Company will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.

If you believe that any of your data that the Company processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

6. Cookies

We may obtain data about you from cookies. These are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies also enable us to deliver more personalised content.

The table below explains the cookies we use and why.

The cookie-related information is not used to identify you personally and the pattern data is fully under our control. These cookies are not used for any purpose other than those described here. The only third-party cookies we use on our site are Google Analytics and Force24 (please see below on Google Analytics & Force24)

The table below explains the cookies we use and why.

Strictly necessary cookies	These cookies are needed for effective site usage and, as such, cannot be turned off. These cookies do not gather information about you that could be used for other purposes, such as marketing or tracking your Internet usage.
Performance cookies	These cookies help us monitor and improve the performance of our website, counting visits, identifying traffic sources and judging site popularity. We use Google Analytics for this purpose, but all information gathered is anonymous.
Functionality cookies	These cookies remember choices you make upon first visiting our website, including user name, language or where you are based. This allows the website to remember changes you have made to text size, font and other customizable elements. It also prevents repeat processes such as pop-ups. Functionality cookies may also be used to provide services you wish to use, such as watching video and commenting, and are usually anonymous.

Google Analytics

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). This service uses cookies to help us analyse how users navigate and interact with the site. The information generated by the cookie includes your IP address and is transmitted to and stored by Google on servers in the United States. It uses this information to create reports on website activity for Tiger Recruitment and providing other services relating to website activity and internet usage. Google may send this information to third parties where required to do so by law, or if such third parties use the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

Most web browsers allow some control of most cookies through the browser settings.

Force24 Cookies & Tracking

This website uses Force24's marketing automation platform.

Force24 cookies are first-party cookies and are enabled at the point of cookie acceptance on this website. The cookies are named below:

- F24_autoID – This is a temporary identifier on a local machine or phone browser that helps us track anonymous information to be later matched with F24_personID. If left anonymous, it will be deleted after 6 months. Non-essential, first-party, 1 year, persistent.
- F24_personID – This is an ID generated per individual contact in the Force24 system to track behaviour and form submissions from external sources per user. This is used for personalisation and segmentation for future communications. Non-essential, first-party, 1 year, persistent.

The information stored by Force24 cookies remains anonymous until:

- Our website is visited via a click from an email or SMS message sent via the Force24 platform, and cookies are accepted on the website.
- A user completes a form containing their email address, either on our website or via Force24 landing pages.

The Force24 cookies will remain on a device for 1 year unless manually deleted.

Force24 also uses similar technologies including tracking pixels and link tracking to monitor your viewing activities

- Device & browser type and open statistics: All emails have a tracking pixel (a tiny invisible image) with a query string in the URL. Within the URL we have user details to identify who opened an email for statistical purposes.
- Link Tracking: All links within emails and SMS messages sent from the Force24 platform contain a *unique tracking* reference, this reference help us identify who clicked an email for statistical purposes.

7. Login Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

8. Links to external websites

The Company's website may contain links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Company's website.

9. Sale of business

If the Company's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business. Where the sale of the business results in the transfer of your details to a different data controller we will notify you of this.

10. Data Security

The Company takes every precaution to protect users' information.

- Firewalls including anti spyware software
- Anti-Virus software
- Patching
- Anti-spam filters
- All data is backed up daily
- All files/data are stored on password protected systems

Only employees who need the information to perform a specific job (for example, consultants, our accounts clerk or a marketing assistant) are granted access to your information.

The Company uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/ the Internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/the Internet.

If you share a device with others, we recommend that you do not select the "remember my details" function when that option is offered.

If you have any questions about the security at our website, you can email compliance@tiger-recruitment.co.uk.

11. Changes to this privacy statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.

12. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: compliance@tiger-recruitment.co.uk or call 2079171801.

You also have the right to raise concerns with the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/make-a-complaint/>, or any other relevant authority should your personal data be processed outside of the UK and you believe that your data protection rights have not been adhered to.

Annex A

a) The lawfulness of *processing* conditions for *personal data* are:

1. **Consent:** *the individual has given clear consent for you to process their personal data for a specific purpose.*
2. **Contract:** *the processing is necessary for the performance of a contract with the data subject or in order to take specific steps before entering into a contract.*
3. **Legal obligation:** *the processing is necessary for compliance with a legal obligation to which the data controller/data processor is subject to.*
4. **Vital interests:** *the processing is necessary to protect someone's life.*
5. **Public task:** *the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official functions, and the task or function has a clear basis in law.*
6. **Legitimate interests:** *the processing is necessary for the legitimate interests pursued by the data controller or a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.*

b) The lawfulness of *processing* conditions for *special categories of personal data* are:

1. The *data subject* has given explicit consent to the *processing* of the *special categories of personal data* for one or more specified purposes, except where the *data subject* is not permitted or able to give *consent*.
2. *Processing* is necessary for carrying out obligations and exercising specific rights of the *data controller* or of the *data subject* under employment, social security or social protection law, in so far as it is authorised by UK law or a collective agreement, provided for appropriate safeguards for the fundamental rights and interests of the *data subject*.
3. *Processing* is necessary to protect the vital interests of the *data subject* or another person where the *data subject* is physically or legally incapable of giving *consent*.
4. *Processing* is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the *personal data* are not disclosed outside that body without the consent of the *data subject(s)*.
5. *Processing* relates to *personal data* which manifestly made public by the *data subject*.
6. *Processing* is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
7. *Processing* is necessary for reasons of substantial public interest on the basis of UK law which is proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject domestic law.
8. *Processing* is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of UK law or a contract with a health professional and subject to relevant conditions and safeguards.
9. *Processing* is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices on the basis of UK law.
10. *Processing* is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and interests of the *data subject*.