Candidate and Agency Worker Privacy Notice

How Venn Group uses your personal information

This notice explains how Venn Group collects, uses, stores and shares personal information, how long it is kept and the rights individuals have under UK data protection law.

Who we are

Venn Group Limited is the data controller for the personal information described in this notice. This means Venn Group decides why and how that information is used, stored and shared.

Registered office: 1 London Bridge, London, SE1 9BG

Company number: 04015584

Data Protection Officer: Paul Hayward, Associate Director – Finance Operations and IT

Email: phayward@venngroup.com

Who this notice applies to

This notice applies to current and former candidates, prospective candidates, applicants, work-seekers, temporary agency workers (including those operating through a personal service company), contractors and consultants who are identified, registered, introduced, supplied or placed through Venn Group. It also applies to relevant personal information about referees, emergency contacts and dependants provided to us during recruitment or an assignment.

It does not apply to employees or other individuals working directly within Venn Group's internal business, who are covered by the Employee Privacy Notice. Client and business contacts should be covered by separate privacy information.

Personal information we collect and use

Depending on your circumstances and the services provided, we may collect and use:

- identity and contact information, including name, title, date of birth, address, telephone number, email address and photograph;
- CV, employment history, education, qualifications, professional memberships, skills and experience;
- job preferences, availability, location, salary or rate expectations and willingness to travel or relocate;
- applications, interview notes, assessments, test results, consultant notes and communications with us;
- identity, right-to-work, immigration, reference, background-check, vetting and eligibility information;
- National Insurance number, tax information, bank details, timesheets, assignment records, expenses, pay and holiday-pay information where relevant;
- client feedback, attendance, performance, conduct, complaints, incidents, health and safety and assignment-management information;
- information about use of our websites, portals, communications and systems where relevant; and
- information needed for audits, fraud prevention, safeguarding, legal claims, regulatory requirements and business continuity.

Special category and criminal offence information

Where relevant and lawful, we may process information about health, disability, reasonable adjustments, racial or ethnic origin, religious or philosophical beliefs, trade union membership, sex life or sexual orientation, and other special category information. We may also process criminal offence information for roles where checks are relevant and lawful.

We will identify an appropriate lawful basis and an additional legal condition before using special category or criminal offence information. Depending on the circumstances, this may include employment and social-protection law, assessment of working capacity, substantial public interest, legal claims or explicit consent. We will apply appropriate safeguards and maintain an appropriate policy document where required.

Where information comes from

We may obtain information directly from you and from job boards, professional networking sites, recruitment platforms, referrals, recruitment partners, former employers, referees, professional bodies, background-check and vetting providers, public authorities, clients, umbrella companies, payroll providers and other parties involved in recruitment or an assignment. We may also identify potential candidates through appropriate public or recruitment-focused sources.

If we obtain your information from another source, we will provide the information required by law within the applicable timeframe, unless an exemption applies. If you give us another person's details, such as a referee or emergency contact, you should tell that person that you have shared their information with us.

Credit reference and affordability checks

To help us assess applications, prevent fraud, and meet out legal and regulatory obligations, we may obtain information about you from credit reference agencies (CRAs). We obtain this information via Creditsafe, which uses its data partner, TransUnion to supply consumer credit and identity data.

- Creditsafe Business Solutions Limited is authorised and regulated by the Financial Conduct Authority. FCA Firm Reference Number: 742313.
- TransUnion International UK Limited is authorised and regulated by the Financial Conduct Authority. FCA Firm Reference Number: 737740.

The information we receive may include data relating to your identity, credit commitments, payment history and public record information. This data us used solely for legitimate business purposes, including creditworthiness assessment, identity verification and fraud prevention, in accordance with applicable data protection laws.

Further information about how Creditsafe and TransUnion process your personal data can be found on their respective privacy notices:

- Creditsafe Privacy / Transparency Notice (Customers & Suppliers): https://www.creditsafe.com/gb/en/legal/transparency-notice-customer-supplier.html
- TransUnion Credit Reference Agency Information Notice (CRAIN): https://www.transunion.co.uk/legal/privacy-centre/pc-credit-reference
- TransUnion Bureau Privacy Notice: https://www.transunion.co.uk/legal/privacy-centre/pc-bureau

Why we use personal information and our lawful bases

The lawful basis depends on the purpose and information involved. The main purposes and likely lawful bases are summarised below. Venn Group's internal processing records should identify the basis used for each activity.

Purpose	Likely lawful basis

Finding and contacting potential candidates	Legitimate interests; consent where appropriate
Registration, matching and discussing opportunities	Steps before contract; legitimate interests
Applications, interviews, assessments and introductions	Steps before contract; legitimate interests
Sharing relevant candidate information with clients	Steps before contract; legitimate interests; consent where appropriate
Identity, right-to-work, qualification, reference and vetting checks	Legal obligation; steps before contract; legitimate interests
Contracts, assignments, timesheets, pay, tax, expenses and holiday pay	Contract; legal obligation; legitimate interests
Assignment management, health and safety, complaints and incidents	Contract; legal obligation; legitimate interests; additional condition where sensitive information is used
Communicating about relevant roles and recruitment services	Legitimate interests; consent where required by electronic-marketing rules
Audit, fraud prevention, safeguarding, legal claims and regulators	Legal obligation; legitimate interests; legal claims

Legitimate interests

Where we rely on legitimate interests, these may include operating and improving recruitment services, identifying and matching candidates, maintaining candidate and client relationships, filling vacancies, managing assignments, keeping appropriate business records, protecting people, systems and information, preventing fraud and dealing with legal claims. We will balance these interests against your rights, interests and reasonable expectations.

When providing information is required

Some information is required so we can assess suitability, verify identity or right to work, introduce you to a client, enter into or perform a contract, administer an assignment or make payment. If required information is not provided, we may be unable to progress an application, make an introduction, offer or continue an assignment, or pay you correctly. We will explain the particular consequence where relevant.

Who we share information with

Where relevant and lawful, we may share personal information with:

- prospective and actual clients, hiring managers and organisations involved in the recruitment process or assignment;
- managed service providers, recruitment process outsourcing providers and recruitment partners;
- umbrella companies, payroll and payment providers, banks and pension providers where relevant;
- background-check, vetting, identity, right-to-work, reference and professional-body providers;
- occupational health, workplace-adjustment, training and health and safety providers;
- group companies, authorised staff, IT, hosting, communications and document-management providers;
- auditors, insurers, legal advisers and other professional advisers; and
- HM Revenue & Customs, regulators, courts, tribunals, law-enforcement bodies and other public authorities where required or permitted by law.

Some recipients, including clients and umbrella companies, may act as independent data controllers for their own use of your information. Where an organisation processes information on our behalf, we require appropriate contractual, confidentiality and security protections.

International transfers

Where personal information is transferred outside the United Kingdom, Venn Group will use a lawful transfer mechanism and any required safeguards. These may include UK adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to approved standard contractual clauses or another safeguard permitted by law. You may ask for information about the safeguards relevant to your information.

Security

Venn Group uses appropriate organisational and technical measures designed to protect personal information against accidental or unlawful loss, alteration, disclosure, access or destruction. Access is limited according to business need and is subject to confidentiality and security responsibilities.

Retention

We keep personal information only for as long as reasonably necessary for recruitment, placement, assignment, payment, legal, tax, regulatory, safeguarding, audit and dispute purposes. Periods vary by record type and relationship and are set out in our approved retention schedule. We may retain relevant information so we can consider you for future opportunities where this remains lawful and reasonable. You may object to this use. Information will then be securely deleted, destroyed or anonymised unless a lawful reason requires longer retention.

Recruitment technology and automated decisions

We may use technology to support candidate searching, matching, screening, communication and administration. Where technology supports a decision, appropriately authorised individuals remain responsible for the recruitment process unless we tell you otherwise.

If we make a decision based solely on automated processing that produces legal or similarly significant effects, we will provide the information and safeguards required by law. These may include the right to obtain human intervention, express your point of view and challenge the decision.

Your rights

Subject to legal limits and exemptions, you may have the right to:

- be informed about the use of your personal information;
- access your personal information and receive a copy;
- ask us to correct inaccurate or incomplete information;
- request erasure or restriction in certain circumstances;
- object to processing based on legitimate interests and to direct marketing;
- receive and transfer certain information where data portability applies;
- withdraw consent where consent is the lawful basis; and
- request safeguards in relation to solely automated decisions.

These rights do not apply in every situation. We may verify your identity and ask for information to clarify a request. We will respond within the time required by law.

Complaints

You can raise a data protection complaint with the Compliance Team at dataprotection@venngroup.com. We will acknowledge the complaint within 30 days, take appropriate steps to investigate it without undue delay, keep you informed of progress and tell you the outcome.

You also have the right to complain to the Information Commissioner's Office, the UK supervisory authority. You do not have to complete Venn Group's internal complaints process before contacting the ICO.

Changes to this notice

We may update this notice when our services, processing activities, systems, suppliers or legal obligations change. The current version will be made available, and material changes will be brought to the attention of affected individuals where appropriate.

Sign off

Policy Owner:	Paul Hayward
Signature:	
Last review:	01/09/2026
Next review:	01/09/2027