

COMPANY NAME	Dedicare Healthcare Limited ("Dedicare")
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LATEST UPDATE	APRIL 2026
VERSION	POL001

1. INTRODUCTION

Dedicare is a recruitment business providing work-finding services to clients and work-seekers. In order to deliver these services, Dedicare processes personal data (which may include special category data). For the purposes of UK data protection law, Dedicare acts as a data controller. This means we are responsible for determining how and why your personal data is processed.

We are committed to ensuring that personal data is processed lawfully, fairly, transparently, and securely in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. PURPOSE

This Privacy Policy explains:

- What personal data we collect
- How we use it
- The lawful bases for processing
- Who we share it with
- How long we keep it
- Your rights in relation to your data

We will only use your personal data in accordance with this Privacy Policy and applicable data protection laws.

3. HOW WE COLLECT YOUR PERSONAL DATA

Dedicare will collect your personal data (which may include special category data) for the purpose of providing you with work-finding services. We may collect your personal data in the following ways:

- Directly from you (e.g. via phone, email, website, or in person)
- Through our website or online applications
- From job boards or CV databases where you have made your information / data available
- Via referrals from colleagues or third parties
- From other recruitment agencies where we have a contractual relationship
- Through pre-employment screening processes (e.g. occupational health, references, DBS checks)

4. CATEGORIES OF PERSONAL DATA

We may collect and process the following categories of data.

4.1. Personal Data

- Full name, date of birth, gender, nationality, next of kin details
- Contact details (telephone number, email address, postal address)
- CV, employment history, training, and qualifications
- Proof of identity and right to work documentation
- Bank details and National Insurance number
- Professional registrations and indemnity information
- Information required for references and employment checks
- Any additional information required to complete pre-employment processes

4.2. Special Category Data

We will only process special category data where a lawful condition applies. Where necessary, we may process:

- Criminal allegations and convictions
- Fitness to practise declarations
- Health information or disability details relevant to the role

5. HOW WE USE YOUR PERSONAL DATA

We process and use your personal data for the purpose of providing recruitment and work-finding services, to:

- Register and manage your candidate profile
- Match you with suitable job opportunities
- Assess your suitability for roles
- Submit your details to clients
- Arrange interviews and placements
- Manage assignments and payroll
- Carry out pre-employment and compliance checks
- Maintain accurate records
- Comply with legal and regulatory obligations
- Improve and manage our recruitment services
- Investigate, report, and detect crime

6. LEGAL BASIS FOR PROCESSING

We process personal data under the following lawful bases under Article 6 UK GDPR.

6.1. Contract - processing necessary for:

- Candidate registration
- Recruitment matching and placements
- Managing assignments
- Payroll and payment processing

6.2. Legal Obligation - processing required to comply with legal obligations, including:

- Conduct of Employment Agencies and Employment Businesses Regulations 2003
- HMRC tax, payroll, and National Insurance requirements
- Immigration and right to work legislation
- Safeguarding obligations

6.3. Legitimate Interests - we may process data where necessary for our legitimate interests, including:

- Managing client relationships
- Preventing fraud and ensuring data security
- Improving service delivery
- Operating and managing recruitment services
- Maintaining and updating candidate/client records
- Communicating relevant job opportunities

Where we rely on legitimate interests, we ensure your rights are not overridden.

6.4. Consent - we rely on consent only where required, such as:

- Marketing communications
- Other non-essential communications
- Optional job alerts (where not essential to service delivery)

You may withdraw consent at any time without affecting prior lawful processing.

7. SPECIAL CATEGORY DATA

Where we process special category data, we rely on conditions under Article 9 UK GDPR, including:

- Employment and social protection law
- Occupational health and working capacity
- Legal claims
- Explicit consent (only where necessary)

8. SHARING YOUR PERSONAL DATA

We may share your personal data with:

- Clients and their systems (for job placement and payment processing)
- Other recruitment agencies within the supply chain
- Framework providers and contract partners
- Auditors and regulatory bodies
- Payroll providers, pension providers, and payment intermediaries
- The Recruitment and Employment Confederation (REC), where applicable
- Internal departments within Dedicare
- Pre-employment screening providers, including:
 - ✓ Reference providers (former employers)
 - ✓ Occupational health providers
 - ✓ Training providers
 - ✓ Identity and right to work verification services
 - ✓ Criminal record check providers
 - ✓ Professional regulatory bodies

9. SHARING YOUR DATA WITH THIRD PARTIES

Third parties are required to process data securely and in accordance with Article 28 UK GDPR (Data processing agreement). Where we share your personal data with third parties, we ensure appropriate safeguards are in place, including relevant contractual agreements to protect your information. Such sharing may be necessary to prevent and detect fraud, maintain information security, complete pre-employment checks, or support the provision of work-finding services.

For details of the third parties we work with, please contact **mail@dedicare.co.uk**.

10. MARKETING AND COMMUNICATIONS

We may contact you regarding job opportunities using the contact details you have provided where this is necessary to deliver our services. We will only send you marketing communications (such as company updates, industry news, and service information) where you have provided your consent or where otherwise permitted by law.

You can opt out of marketing communications at any time by contacting **mail@dedicare.co.uk**.

11. INTERNATIONAL TRANSFERS

We will primarily process your data within the UK and the European Economic Area (EEA). Where it is necessary to transfer data outside of these regions, we will ensure appropriate safeguards are in place in accordance with Articles 44–49 UK GDPR, including:

- Adequacy regulations
- Standard contractual clauses
- Other approved safeguards

12. DATA RETENTION

We will retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, including legal, regulatory, and contractual obligations.

Retention periods include:

- At least one year in accordance with the Conduct Regulations
- As required by HMRC and tax legislation for payroll-related data
- Up to 7 years where required under contractual or audit obligations

Where processing is based on your consent, we will retain your data in line with our Record Retention Policy.

You may request a copy of this policy by contacting **mail@dedicare.co.uk**.

13. YOUR DATA PROTECTION RIGHTS

You have the following rights under data protection law:

- The right to be informed about how your data is used
- The right to access your personal data
- The right to request correction of inaccurate data
- The right to request deletion (in certain circumstances)
- The right to restrict processing
- The right to data portability
- The right not to be subject to automated decision-making
- The right to withdraw consent at any time
- The right to object to processing based on legitimate interests

To exercise your rights, contact **mail@dedicare.co.uk**.

14. COOKIES AND WEBISTE USE

We use cookies and similar technologies to improve website functionality, analyse usage, and support marketing activities. You can manage your cookie preferences via our website cookie banner or your browser settings.

For full details, please refer to our Cookie Policy available by contacting **mail@dedicare.co.uk**.

15. DATA SECURITY

While we take all reasonable steps to protect your data, please note that transmission via email or the internet cannot be guaranteed to be completely secure. We take appropriate technical and organisational measures to protect your personal data, including:

- Secure data storage systems
- Encryption where appropriate
- Firewalls and anti-virus protection
- Access controls and user authentication
- Regular security reviews

16. THIRD-PARTY WEBSITES

Our website may contain links to external websites. We are not responsible for the privacy practices of those sites and encourage you to review their privacy policies.

17. CHANGES TO THIS POLICY AND BUSINESS CHANGES

We may update this Privacy Policy from time to time. Any updates will be published on our website, and where appropriate, we will notify you of significant changes.

18. CHANGES TO THE BUSINESS

If Dedicare is sold, merged, or integrated with another business, your personal data may be shared with relevant parties, including advisers and new owners, in accordance with applicable law.

19. COMPLAINTS

If you have any concerns about how your personal data is handled, please contact us at **mail@dedicare.co.uk**.

You also have the right to lodge a complaint with the UK supervisory authority.

Information Commissioner's Office (ICO)

❖ <https://ico.org.uk/concerns>

❖ Telephone: 0303 123 1113