



RECRUITMENT PRIVACY NOTICE

Who are we?

Essex Services Group (ESG) is committed to protecting and respecting your privacy. This Privacy Notice (“Notice”) describes how ESG may collect, process, use, store and disclose the personal data that we collect when you apply for a job with ESG.

The types of personal data we collect are described below in the section entitled ‘Your personal data and how we collect it’. Please read this Notice carefully to understand our practices regarding the processing your personal data.

For the purposes of the Data Protection Act 2018 and UK GDPR, we are a “data controller” and we are responsible for the personal data we process.

ESG has a designated Data Protection Officer who can be contacted at DPO@esglimited.com.

This Notice informs you how we protect your personal data and provides information about your privacy rights. It supplements other Privacy Notices you may receive from us, and it is not intended to override them.

Your personal data and how we collect it

Registering as a Candidate

We may collect the following categories of personal data if you register as a Candidate via our website or by email, telephone, or post:

- Your identity (your full name, previous names, evidence of change of name); gender, date of birth and marital status;
- Evidence of your right to work in the uk which may include a photograph, nationality, place of birth, birth certificate, driving licence, etc. (in accordance with home office requirements);
- Contact details including your email, home address and phone numbers so that we can contact you by email and text message;
- Your job search criteria, preferences and expectations;
- Your qualifications, skills, experience and training;
- Current and desired remuneration/payrate and other benefits;
- Educational history;
- Employment history;
- Details of employment or educational referees;
- References;
- Details of disabilities (where provided by you and if relevant);
- Unspent criminal / motoring convictions, court proceedings and pending court proceedings relating to an offence committed or alleged to have been committed by you;
- Other information contained in your cv or that you choose to provide to us;
- Technical data including internet protocol (ip) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website;
- Usage data including information about how you use our website and services;
- Marketing and communications data including your marketing and communication preferences.

We will collect your personal data either directly from you or from other sources, including when you apply for a job via a Job Board, directly through our website, from Social Media sites such as LinkedIn, or when you provide us with your details during a job fair, promotional, networking or training event.



Applicants for advertised posts

If you are applying for an advertised role, we may collect your personal data via your CV, referees, professional and educational organisations, and other sources. We will process your personal data for the purposes of administering your application, managing our hiring processes, and assessing your suitability. We will store your personal data securely on our confidential HR database.

Your personal data cannot be viewed or accessed by anyone except members of our HR team and other staff connected to the hiring process. We will ensure that your personal data is adequately protected, secure and kept confidential. If we engage a data processor to provide pre-employment screening services or testing, we will ensure that access is limited to your personal data which is compatible with those services and the service provider is contractually obliged to comply with applicable data privacy laws, confidentiality, and to provide adequate safeguards to keep your personal data secure.

By applying for employment with us, you understand that we will be processing your personal data for these purposes.

Special Categories of personal data

The UK GDPR defines special categories of personal data as information about a person's race and ethnicity, religious or philosophical beliefs, trade union memberships, political opinions, genetic data, biometric and health data, and information concerning a natural person's sex life or sexual orientation.

We only process special categories of personal data relating to you where we have a lawful basis and a purpose for doing so and we have identified an appropriate condition i.e. with your explicit consent for us to do so as part of the recruiting process.

Criminal offence information

Details about your unspent criminal or motoring convictions, court proceedings, or any pending proceedings relating to an offence committed or alleged to have been committed by you, are only processed if they are relevant (for example, to enable us to assess whether they present grounds for not taking your candidate registration or job application further), and in accordance with the restrictions imposed by law.

We may be obliged to disclose unspent convictions and criminal proceedings to our Hiring Managers so that they can determine if they are relevant to your suitability for a role within our organisation. This information will be retained for no longer than necessary before being deleted.

Vulnerable candidates

We are committed to protecting vulnerable candidates. We provide training to our staff who come into regular contact with vulnerable candidates to ensure they are aware of, and can identify signs of, people in potentially vulnerable circumstances. We may record relevant personal data so that we can respond appropriately in future – for example, by ensuring that no further marketing or fundraising requests are sent.

Information from our website

Our website uses cookies to record visits to our website. For instance, we may collect information about your computer, including where available, your IP address, operating system, and browser type, for system administration purposes. We also collect information about how our website is used, such as the searches you have made and the webpages you have visited, with your consent. This information helps us to improve the website and provide you with a good experience when you browse our web pages.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become



inaccessible or not function properly. For more information about the cookies we use, and to manage your cookie settings please see our Cookie Policy.

How we use your personal data

We collect, process, use, store and disclose your personal data and other data we collect during our candidate registration process, to send you job alerts by email, temporary assignments, project related work and permanent fixed term contracts. Your personal data will be disclosed to our HR team and Hiring Managers.

We may also process your personal data for other legitimate business purposes such as producing statistics, analysing how successful our recruitment and marketing campaigns are, the number of visitors to our website and complying with other contractual, legal, and regulatory obligations and duties. If you provide us with information about third parties, e.g. referees, we will assume the third party in question has given you permission to do so and thereby consents to ESG collecting, processing, and transferring their personal data to the same extent as yours.

We do not use automated decision-making technologies to make final or conclusive decisions about you, and a member of our staff will always be involved in the selection of potential candidates i.e. sifting and scoring suitability.

Change of Purpose

We will only use your personal data for the purposes for which we collected it (e.g. recruitment), unless we reasonably consider that we need to use it for a purpose that is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Use of Artificial Intelligence

We do not use Artificial Intelligence (AI) as part of our recruitment processes.

Lawful basis for processing

We have set out below the main ways that we will collect, process, use, store, share and disclose your personal data and the lawful bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Legitimate interests – collecting, reviewing information on cvs and applications, shortlisting, collecting new information at interview, assessments and verifying candidates;
- To fulfil a contract or for the purposes of entering into a contract with you – if you have been made and have accepted a conditional offer of employment;
- When it is our legal or regulatory duty – to share details with HMRC for example or right to work checks; or
- Consent – if you ask us to inform you of another similar vacancy.
- For the purposes of recognised legitimate interests, particularly:
 - Disclosing your personal data to a public authority who require it to carry out their functions.
 - Where the processing is necessary for responding to an emergency.
 - Where the processing is necessary for the purposes of preventing or detecting crime or apprehending or prosecuting offenders.



- Where the processing is necessary for safeguarding vulnerable individuals.

If we process special category data as part of the recruitment process (such as health data) we will rely on Article 9(2)(b) which covers our obligations in relation to employment and safeguarding of fundamental rights or Article 9(2)(g) for reasons of substantial public interest. We will also rely on Schedule 1, part 1(1) which relates to processing for employment purposes.

Sharing your personal data

We will only disclose your personal data to another organisation or person where we have a purpose for doing so i.e. delivering our services, where we have obtained prior consent or on the basis of our legitimate interests, or if there is an apparent risk to safety, or we are required to do so by law.

ESG may disclose your personal data to Data Processors/suppliers and other organisations in the following circumstances:

- a. To companies and individuals we employ to perform business functions and services on our behalf. Examples of service providers include providing payroll services to enable us to pay our employees and temporary workers who work on client premises; background screening and verification services; hosting our web servers; managing job posting applications via our processors; analysing data and producing statistics and legal, accounting, audit and other professional services.
- b. To government agencies including hm revenue & customs; uk border agency; home office; police and other law enforcement agencies; regulatory and supervisory authorities (such as the uk information commissioner); credit reference agencies; the disclosure and barring service; and data processors performing sanctions and terrorism checks.
- c. To comply with applicable laws, the service of legal process, or if we reasonably believe that such action is necessary to:
 - 1. Comply with the law requiring such disclosure;
 - 2. Protect the rights or property of esg;
 - 3. Prevent a crime, protect national security or for fraud detection or prevention; or
 - 4. Protect the personal safety of individuals using our website or members of the public.

Where applicable, we will impose appropriate contractual, security, confidentiality and other obligations on to processors we have appointed, based on the nature of the services they provide to us. We will only permit them to process your personal data in accordance with the law and our instructions. We do not allow them to use your personal data for their own purposes and when our relationship ends, we will ensure your personal data is securely returned or destroyed or anonymised so that you can no longer be identified.

Transferring personal data outside of the UK

The personal data that we collect from you is processed on our servers located in the UK. If your information needs to be transferred outside of the UK to a country that has not been granted a finding of adequacy by the UK Government, we will transfer your data using 'appropriate safeguards' i.e. an International Data Transfer Agreement or EU Standard Contractual Clauses with the UK Addendum, or we will seek your consent, on a case-by-case basis, and where appropriate to do so.

How long we retain your personal data

We retain your personal data in a live environment for as long as necessary to fulfil the purpose(s) for which it was collected (including as required by applicable law or regulation). This means we will keep your personal data throughout the period of your relationship with us unless otherwise stated. Where there is a need, personal data is securely archived with restricted access managed through the application of appropriate safeguards.



We retain successful Candidate information (including contracts, evidence of identity, financial and transaction data) for 6 years from when our relationship ends, for legal, compliance and tax purposes. Right to work checks records will be retained for 2 years after an employee has left ESG.

If you wish to withdraw your job application, you can also ask us to delete your personal data from our HR database and other files.

If your employment application is unsuccessful, we will retain your personal data on our HR database for a period of 6 months for the purposes of evidencing that we have conducted the recruitment process in a fair and transparent way and have not discriminated against applicants on prohibited grounds. At the end of the retention period, your personal data will be automatically deleted. Occasionally we may ask if you would like us to retain your CV if we consider that you may be suitable for future roles.

Where there is no retention period stated in law, we determine the appropriate retention period for personal data by considering the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the data, the purposes for which we process it and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you, and we cannot identify you). We do this for research or statistical purposes and in which case, we may use this anonymised data indefinitely without further notice to you.

You can request more details of the retention periods applicable to your personal data by contacting us at: DPO@esglimited.com.

Your Legal Rights

We support your rights in relation to the processing of your personal data under the UK GDPR, including your:

- Right to be informed (such as this privacy notice)
- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object
- Rights related to automated decision-making including profiling
- Right to complain about the handling of your personal data

Accordingly, you have the right at any time to:

- **Request access** to your personal data. A 'Data Subject Access Request' (DSAR) enables you to receive a copy of the personal data we hold about you, unless an exemption applies, and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate personal data we hold about you corrected, although we may need to verify the accuracy of the new data you provide to us.
- **Request erasure / deletion / removal** of your personal data. This enables you to ask us to delete or remove your personal data where we do not have a valid reason to continue to process it. We may not always be able to comply with your request for erasure for specific legal reasons which we will explain to you, if applicable, at the time of your request.



- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a 3rd Party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful, but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your personal data, but we need to verify whether we have overriding legitimate grounds to process it.
- **Complain** about how we have used your personal data.

Additional information, response times and fees

You can request a copy of the personal data that we hold about you or exercise any of your other data subject rights, by contacting us at any time using any of the methods shown below in the 'How do I contact you?' section.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights or when you make an informal request). This is a security measure to ensure that personal data is not disclosed to anyone other than the individual who has the right to receive it. We may also ask you for further information in relation to your request to help us locate your data and to speed up our response.

We try to respond to all requests within one month. It may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You will not have to pay a fee to exercise any of these rights. However, we may charge a reasonable fee if your request is unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Withdrawing your consent

Where we process your information based on your consent, you may withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent. You can withdraw your consent by contacting us using any of the methods shown below in the 'How do I contact you?' section.

Updating your information

We want to keep your personal data accurate and up to date. Accordingly, you may choose to correct, update, or delete your personal data, by contacting us using any of the methods shown below in the 'How do I contact you?' section.

If you have opted-in to receiving communications from us, your preferences will remain in effect until you tell us that you want to opt-out of receiving further communications. You can do this by clicking the link at the footer of the emails we send to you.



Customer Feedback and Complaints

If you would like to share your experience of applying for work with ESG, good or bad, or that something wasn't quite right, we want to hear about it. You can provide feedback to our HR team or Hiring Manager or if you are not entirely satisfied with a response you have received, you can put your concerns in an email, outlining the issues, your desired outcome, and any other information you believe is relevant and send it to – DPO@esglimited.com.

We hope you'll never have the need to do so, but if you do want to complain about our use of your personal data, or our handling of your data subject rights requests, you can contact us using any of the methods shown below in the 'How do I contact you?' section. We will investigate your complaint and provide you with an appropriate response as quickly as possible.

Making a complaint to the Information Commissioner

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), at any time. For instance, if you are unhappy with the way in which we are processing your information, or we have failed to facilitate your rights. However, we would ask you to provide us with the opportunity to discuss your concerns before you contact the ICO. The ICO can be contacted as follows:

By post: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

By phone: 0844 496 4636 (local rate)

Further information about how to make a complaint to the ICO can be found [here](#).

How do I contact you?

You may contact us using any of the following methods:

By email: DPO@esglimited.com

Changes to this Privacy Notice

We continuously review the content of our Privacy Notice to ensure it accurately reflects what we do with your personal data.

You can print a copy of this Notice by pressing Ctrl + P on your keyboard or navigating to Print Page in your browser.

This Privacy Notice was last updated in June 2026.