

AAA Privacy Policy

Aberdeen Appointments Agency (AAA) is a subsidiary of Sword IT Solutions. In the course of providing services to their clients, AAA will gather personal data. The method by which data is gathered and the legal basis for doing so is outlined below.

AAA gather certain personal information when it is submitted through channels such as email communications, telephone calls, social media, job boards, AAA website, etc.

Information That AAA Gather

AAA may gather the following personal data on you:

- Name and Address
- Phone Numbers
- Email Address
- National Insurance Number
- Nationality (via right to work check)

There may also be times where AAA gather special category personal data. Special category data has additional protections that are mandated by UK GDPR, therefore, AAA will only ever process this data with your explicit consent or if the processing is necessary for a legitimate purpose.

AAA may gather the following types of special category personal data on you:

- Health information as appropriate
- Criminal conviction(s)

Any data that is processed will be protected using the information security controls mandated by GDPR (e.g. cryptographic controls, rights-based access, etc).

Purpose of Data Processing

AAA look to identify the most suitable candidates for a range of available opportunities including:

- Assessing suitability and contacting you
- Connecting you with potential employers
- Facilitating remuneration such as payroll
- Improving services through feedback
- Carrying out appropriate background checks

We may also be required to share your data if mandated by law, however, the minimum amount will be shared in line with GDPR.

It may be necessary for AAA recruitment consultants to access candidate data when they are temporarily seconded to another company. These consultants remain staff of the Aberdeen Appointments Agency and will only be accessing the data for the purposes outlined above. No

DOC. REF.	VERSION	VERSION DATE	AUTHOR	REVIEWER	APPROVER	CLASSIFICATION
AAA-FRM-002	2	27/05/2025	ALEXANDER Grant	MCNALLY Rebecca	ALEXANDER Grant	Confidential

candidate data will be directly shared with the client unless this is agreed with the data owner (candidate).

Legal Basis for Processing

In order for data to be processed, a legal basis must exist. AAA relies on legitimate interest to process your data for the following purposes:

- Managing our database and keeping your candidate record up to date
- Providing services to you and potential employers
- Contacting you to seek your consent where needed
- Giving you information about similar services

We may also need to process data to satisfy a contractual or statutory requirement such as to facilitate a contract of employment or for tax legislation. You can enquire directly about these requirements by contacting privacy@sword-group.com.

Third Party Data Transfers

AAA may share your personal data with the following recipients:

- Potential employers (who we connect you with)
- Previous employers (who we may seek references from)
- Payroll service providers
- Background checking providers

If we have a requirement to share your information with a new recipient, we will contact you prior to the transfer.

AAA only work with companies who are fully compliant with GDPR which is established during a thorough vetting process prior to onboarding. Contractual agreements exist to protect data when it is transferred between AAA and companies that use AAA for recruitment.

Data will only be transferred as part of the recruitment process, when mandated by the law or when we have contacted you to obtain your explicit consent.

Overseas Transfer of Information

As per the terms of GDPR, any data that is processed will not be transferred outside of the European Economic Area (EEA) The EEA comprises all member states as well as Norway, Iceland and Liechtenstein.

We will contact you for consent prior to sharing your information with any potential employers or other entities that exist outside of these areas. If consent is granted, standard contractual clauses will be enforced to ensure the security of data being transferred.

DOC. REF.	VERSION	VERSION DATE	AUTHOR	REVIEWER	APPROVER	CLASSIFICATION
AAA-FRM-002	2	27/05/2025	ALEXANDER Grant	MCNALLY Rebecca	ALEXANDER Grant	Confidential

Data Retention

The table below outlines the data retention period for the different types of personal data AAA process.

Candidate Type	Data	Retention Period
Job Seekers and Placed Candidates	Job Seeker Profile (includes CV, Passport, Name, Address, etc)	Retention period is 4 years from last engagement. A review process is carried out to ensure processing is still permissible, for more details see below.
Placed Candidates Only	Right to work record	2 years after employment or termination of engagement with AAA
	Annual Leave Records	2 years from point of creation.
	Payroll Records, holiday pay, sick pay, pensions auto – enrolment.	6 years from service provision or deletion of candidate profile.

Retention Review Process – Job Seeker Profile

There is a data retention review process carried out by AAA which seeks to ensure that we do not process the data in a candidate job seeker profile longer than is necessary.

The data retention period begins from the point of last engagement with the job seeker. This can be in the form of an email, phone call, webcam meeting, application for position, etc. If, after a period of 3 years, there has been no further engagement an automated email will be sent to the job seeker asking if they still wish to consent to having their data processed by AAA. If the job seeker responds “no” their data will be removed from the system. If the job seeker does not respond to the email then their data will be automatically removed from AAA systems, in line with the 4-year retention outlined above.

Your Rights

Contact privacy@sword-group.com to exercise any of your rights listed below:

GDPR Right	Description
Right to be informed	Data subjects have the right to be informed of what data of theirs is processed by a company, for which purpose and for how long.
Right to rectification	Data Subjects have the right to request that incorrect or incomplete data be changed.
Right of access	Data Subjects can request a copy of the personal data being held by the business.
Right to erasure	You can request that your data is deleted, however, please note that, in some cases, the law may prevent this right from being exercised.
Right to restrict processing	You can request that AAA restricts how your personal data is used in certain circumstances.
Right to portability	You can request that any data of yours that AAA processes be provided to another processor or back to yourself in an easily readable, widely used format.

DOC. REF.	VERSION	VERSION DATE	AUTHOR	REVIEWER	APPROVER	CLASSIFICATION
AAA-FRM-002	2	27/05/2025	ALEXANDER Grant	MCNALLY Rebecca	ALEXANDER Grant	Confidential

Right to object	You can object to the processing of your data at any time.
Right not to be subjected to automated decision making	You are able to object to any decisions being made about you that is based on automated processing, including profiling.
Right to withdraw consent	You can withdraw your consent at any time, however, there are occasions where we will not be able to grant this request.

Complaints or Queries

If you wish to raise a complaint, contact privacy@sword-group.com in the first instance.

You also have the right to raise concerns with the Information Commissioner's Office on 0303 123 1113 or via <https://ico.org.uk/make-a-complaint/>.

Policy Updates/Review

This policy will be reviewed, at minimum, once a year or as required following changes in legislation or practices affect the policy.

DOC. REF.	VERSION	VERSION DATE	AUTHOR	REVIEWER	APPROVER	CLASSIFICATION
AAA-FRM-002	2	27/05/2025	ALEXANDER Grant	MCNALLY Rebecca	ALEXANDER Grant	Confidential