AAA Privacy Policy

Aberdeen Appointments Agency (AAA) is a subsidiary of Sword IT Solutions. Aberdeen Appointments Agency Ltd is registered in Scotland (company number 214658) and its registered office is H1, Hill of Rubislaw, Aberdeen, AB15 6BL. AAA is the controller of your personal data. 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. This policy applies to job seekers, , candidates, people employed or engaged through AAA, including those working through their own limited companies, and their nominated emergency contacts.

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
- CV, qualifications, employment history and information relevant to your application or placement
- National Insurance Number
- Nationality (via right to work check)
- Emergency contact details (name, phone number and where necessary for the emergency arrangements, their relationship to you), if you are placed by AAA

If you give us someone's emergency contact details, please provide them with a copy of, or link to, this notice and draw their attention to the "Information for Emergency Contacts" section. We may ask you to confirm that you have done so. If you cannot pass the information on, please tell us so that we can arrange to provide it. Please keep the details up to date and tell us if you nominate a different person.

We may process health information where necessary to make reasonable adjustments, administer sickness absence or meet employment-related health and safety obligations. In addition to the lawful bases explained below, we rely on the condition permitting processing necessary to meet obligations or exercise rights under employment, social security or social protection law. Where health information is necessary to establish, exercise or defend legal claims, we rely on the condition permitting that use.

Criminal conviction and offence information is subject to separate legal protections. We only obtain or use it where the check is relevant and lawful for the particular role and an applicable condition under UK data protection law is satisfied. We will explain the purpose and legal basis of any such check when it is arranged.

We use technical and organisational security measures appropriate to the information and the risks involved, including access restrictions and encryption where appropriate.

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
- Making sure your emergency contact can be reached if something happens to you while on assignment

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 candidate data will be directly shared with the client unless this is agreed with you, or as described in this policy (see Third Party Data Transfers).

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
- Sharing your emergency contact details with the client or site you are placed with, so they can contact the right person in an emergency

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.

If You Are Employed by AAA

Some people placed by AAA are employed by AAA and paid through PAYE. If this applies to you, AAA also processes the following data to manage your employment:

- Bank details, tax code and National Insurance number, to pay you
- Identity and right to work records
- Assignment details, working time and holiday records
- Sickness absence records and fit notes

- Pension and auto-enrolment records
- Emergency contact details, for use in an emergency

AAA relies on the following legal bases for this data:

- Contract: to pay you and manage your employment
- Legal obligation: tax, National Insurance, right to work checks, statutory sick pay and pension auto-enrolment
- Legitimate interests: sharing your emergency contact details with the client or site you are placed with, for emergency use only

Health information is also subject to the additional conditions explained above. We do not rely on consent for processing that is necessary to administer your employment or engagement or meet our legal obligations.

We will tell you when information is required by law or is necessary for your employment, engagement or payment arrangements. If you do not provide required information, we may be unable to complete the relevant checks, arrange your placement or make payments.

The recipients of this information and the applicable retention arrangements are explained below.

AAA only shares this data where needed: with HM Revenue and Customs, AAA's payroll and pension providers, and, for emergency contact details only, the client or site you are placed with. Retention periods for employment records are set out in the Data Retention section below.

Information for Emergency Contacts

If someone nominates you as their emergency contact, AAA receives your name and telephone number from that person and, where necessary, information about your relationship to them.

We hold and update these details so that you can be contacted if the person is injured, becomes seriously ill or another emergency concerning their safety or welfare arises. We rely on the legitimate interests of AAA, the worker and the relevant client or site operator in maintaining effective emergency arrangements.

We may share your details with the client or site operator responsible for the person's assignment before an emergency occurs, so that they can contact you promptly if needed. The safeguards and retention arrangements described below apply to your information.

You can contact privacy@sword-group.com to correct your details, tell us that you are no longer the nominated contact, object to our use of your information or exercise your other applicable rights.

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
- Software providers who host or support our recruitment, onboarding and payroll systems
- The client or site operator you are placed with (your emergency contact details only, for use in an emergency)

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, as described in this policy, when mandated by the law or when we have contacted you first.

When we share emergency contact details with a client, we share only the name and phone number, and their relationship to you where needed for the emergency arrangements. The client must only use them in an emergency, keep them secure, not pass them on, and delete them when your assignment ends.

Overseas Transfer of Information

Where personal information is transferred to a separate organisation outside the UK, including through access from overseas, we ensure that the transfer meets UK data protection requirements.

We rely on UK adequacy regulations where they cover the destination and recipient. Otherwise, we use appropriate safeguards, such as the UK International Data Transfer Agreement or the UK Addendum to the EU standard contractual clauses, together with the required assessment and any additional protections.

You can contact privacy@sword-group.com for information about the destinations, recipients and safeguards applicable to your information, including how to obtain a copy of the relevant safeguards.

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.
	Emergency contact details	Deleted when your engagement with AAA ends. Any client we have shared them with must delete its copy when your assignment ends.

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 would like AAA to keep their data. 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.
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

You have the right to complain to AAA about how we handle your personal information. Please contact privacy@sword-group.com. We will acknowledge your complaint within the applicable 30-day period, take appropriate steps to investigate it, keep you informed and provide an outcome without undue delay.

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.

If we make a significant change to how we use or share your data, we will tell you before the change takes effect.