How we use your personal information

Privacy notice for agency workers and candidates

This notice explains what personal information Equation Limited holds about you, why we hold it, who we share it with, how long we keep it and your rights. Please read it with your Terms of Engagement. If anything is unclear, ask your consultant. We can explain it in your language at no cost to you.

Who we are

Equation Limited, trading as Equation Recruitment (company no. 16877403), is responsible for your personal information (the "controller"). Our registered office is 45 Wedgwood Road, Bicester, Oxfordshire OX26 4UL. We find work for people and supply agency workers to clients under Fair Work Agency licence EQUA0007. Equation Limited is registered with the Information Commissioner's Office.

How to contact us about your information

Jason Norman, Managing Director, is responsible for data protection. Bradley Newman, Recruitment Consultant, is our UK contact. You can:

- email jason@equationrecruitment.com (please put "Data protection" in the subject line);
- phone 01869 323 444;
- write to the address above; or
- just tell your consultant.

What we hold about you

- **Who you are:** name, address, phone, email, date of birth, gender, a photo (from your identity check, or one you give us), and an emergency contact.
- **Finding you work:** your CV, work history, skills, qualifications and licences, availability, travel, the jobs you want, interview and screening notes, references and your referees' details, and student term dates.
- **Right to work:** nationality, identity and right-to-work documents, share-code check results, visa type and expiry, and any limit on your hours.
- **Your work with us:** clients, bookings, shifts, timesheets and hours, rest breaks and working time, any 48-hour opt-out, equal-treatment (Agency Workers Regulations) records, safety information and inductions.
- **Pay:** National Insurance number, tax code and starter details, P45, bank details and your confirmation that the account is yours, pay and deductions, holiday, sick pay, family pay, and pension status and contributions.
- **Contact with you:** emails, texts, call notes, and any concern you raise.
- **Technical:** when you sign something through a link we send you, we record the date, time and IP address.

Where we get it

From you; your referees; the clients you work for (timesheets, feedback and incident reports); the Home Office (share-code checks) and our identity-document checking service; HMRC (tax codes) and NEST; our websites; and job boards and CV databases where you made your CV available to recruiters. If we find you that way, we tell you within a month, or when we first contact you if that is sooner. If you worked through Equation Recruitment Ltd before 6 July 2026, some of your records came from it (see "If you worked with us before 6 July 2026" below).

Why we use it, and our legal reasons

What we do	Our legal reason (UK GDPR Article 6)
Find you work, check you are suitable, put you forward and arrange interviews	Steps you ask for before a contract; our legitimate interest in matching people to jobs
Check your right to work	Legal obligation
Agree your terms, give you a Key Information Document, confirm assignments and book shifts	Contract; legal obligation

Pay you, deduct tax and National Insurance, and run holiday, sick pay and pensions	Contract; legal obligation
Keep working-time, minimum-wage, holiday and agency records, and give them to the Fair Work Agency, HMRC or the Home Office when asked	Legal obligation
Health and safety: share safety information with the client, inductions, incidents and night-work health checks	Legal obligation
Look after your welfare and deal with concerns, grievances and harassment	Legal obligation; legitimate interests
Check payroll for signs of fraud or exploitation (for example one bank account used by unrelated people)	Recognised legitimate interests (safeguarding and preventing crime); legitimate interests
Keep records to answer complaints and legal claims	Legitimate interests; legal obligation
Send you job alerts	Your consent, or the "soft opt-in" where it applies. You can opt out at any time
Give a reference about you to a future employer	Your consent

We do not rely on your consent for anything we need to do to find you work, book you or pay you. Where we do ask for your consent, saying no, or changing your mind later, never affects your work.

Sensitive information

- **Health and adjustments.** We hold what you tell us about your health or a disability only to make adjustments and keep you safe. We agree with you what is passed to a client (for example "no lifting over 10 kg", not a diagnosis).
- **Night work.** Before you work nights we offer you a free, confidential health questionnaire, and we repeat the offer every year.
- **Sickness.** We hold sickness dates and fit notes for sick pay.
- **Pregnancy.** If you tell us you are pregnant, we hold what is needed for a risk assessment.
- **Your face.** In the online identity-document check, the service compares your face with the photo on your document. That comparison is biometric data. It is used only to confirm you are the person on the document.
- **Concerns.** A concern or harassment report may contain sensitive details. Only the people handling it see it.
- **Criminal convictions.** We ask about unspent convictions only where a particular role has a documented legal need. You never have to tell us about a spent conviction. Any answer is used only to decide whether you are suitable for that role, and the details are deleted once that decision is made.
- **Equality monitoring.** If you choose to give us equality information, it is optional. We use it only in anonymous summaries to check that our recruitment is fair, and we delete individual answers after 12 months.

Our legal reasons for using sensitive information are:

- **Employment, social security and health and safety law** (UK GDPR Article 9(2)(b), with the Data Protection Act 2018, Schedule 1, paragraph 1);
- **occupational health assessments** (Article 9(2)(h));
- **legal claims** (Article 9(2)(f));
- **exploitation and safeguarding checks:** preventing unlawful acts and protecting people at risk (Schedule 1, paragraphs 10 and 18);
- **equality monitoring:** equality of opportunity (Schedule 1, paragraph 8).

Only the staff who need sensitive information can see it. Our Appropriate Policy Document explains our safeguards; you can ask for a copy.

Who we share it with

We share only what each of them needs:

- **Clients** we put you forward to or supply you to: your name, relevant experience, CV, availability, timesheets, and any safety or adjustment information you agree to.
- **Our payroll bureau,** Transaction Manager Limited, which runs our payroll on the Primo Payroll system.
- **HMRC, NEST** and the banks that pay you. Your net pay is currently sent from a bank account of Equation Recruitment Ltd acting as our paying agent; the payment carries the reference EQUATION LIMITED. We will update this notice when payments move to our own account.
- **Public bodies** when the law requires: the Fair Work Agency, the Home Office, the Health and Safety Executive, the

Information Commissioner's Office, the police and courts.

- **Service providers acting only on our instructions:** our identity-document checking service, Microsoft (our systems, email and file storage), our text-message and phone providers, our accounting software, and Anthropic (the AI features in our system).
- **Others, only where needed:** an occupational health adviser if you need a referral and agree to it; our accountant, HR and legal advisers and insurers; a future employer for a reference, if you agree; and a buyer of our business, if that ever happens.

We never sell your information.

Outside the UK

Some providers handle data outside the UK; for example, our AI provider is in the United States. Before your information goes outside the UK we make sure a legal safeguard applies, such as UK adequacy regulations (including the UK–US data bridge) or the UK International Data Transfer Addendum. You can ask us which applies. Our Managing Director works from Australia until early 2027; when he does, your information stays in our own secured systems.

AI and automated decisions

Our system uses AI to help staff, for example by summarising a CV or reading a timesheet. A person checks the result and makes every decision. We never make a decision about you by automated means alone.

How long we keep it

- **Pay records** (payslips, hours, tax, holiday, minimum wage and pensions): kept indefinitely, because workers, HMRC and pension providers ask about pay many years later, and these records protect you as well as us. Only the staff who need them can see them.
- **Right-to-work copies:** until 2 years after your last pay date.
- **Your wider worker file** (contact details, CV, notes, health notes): reviewed 6 years after your last week of work and reduced to a basic record.
- **If we put you forward but never paid you:** a basic record for 1 year after we were last in touch.
- **If you were never put forward to a client:** 12 months after we were last in touch.

The full retention schedule is available on request.

Your rights

You can ask us, free of charge and in any way you like (in writing, by phone or in person), to:

- give you a copy of your information (we reply within one month);
- correct it;
- delete it, unless the law requires us to keep it;
- restrict how we use it;
- stop using it, including for job alerts, which we always stop;
- give you the information you provided in a portable format.

You can also ask for your pay and minimum-wage records; we provide those within 14 days. While you are working with us, and for 6 weeks after your last shift, your personal links show your bookings and let you download your assignment confirmation and terms. After that, ask us and we will send copies free within 5 working days.

How to complain

Please tell us first, using any of the contact routes above. We acknowledge your complaint within 30 days, look into it, keep you updated and tell you the outcome.

You can also complain to the Information Commissioner's Office: online at ico.org.uk/make-a-complaint; by phone on 0303 123 1113; or by post to Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Do you have to give us this information?

Right-to-work, National Insurance, tax and bank details are required by law or by your contract; without them we cannot place or pay you. Everything marked above as consent is optional, and saying no does not affect your work.

If you worked with us before 6 July 2026

Equation Limited took over the agency-worker business of Equation Recruitment Ltd on 6 July 2026. Your records and holiday balance came across to us, and **Equation Limited has held your information since 6 July 2026.** You may already have been told this in your transfer agreement. If not, we should have told you by early August 2026, and we are sorry it is late. Equation Recruitment Ltd keeps its own older records separately.

Changes to this notice

This is version 1.2 of our privacy notice (EQL-PN-01), issued on 19 October 2026. We review it every year and whenever the way we use your information changes. We will tell you about any important change.