

External Data Protection & Privacy Policy

Policy statement

Practicus Ltd (“Practicus”, “we”, “us”, “our”) provides recruitment and advisory services, including senior search, permanent and interim solutions. Maintaining your privacy is important to us and we take precautions to safeguard your information. As such, this policy applies where we are acting as a data controller. In other words, where we determine the purpose and means of the processing of that information.

We are committed to protecting your personal data and handling it in accordance with our legal responsibilities under privacy and data protection laws applicable wherever we operate, including the DPA 2018, UK GDPR and PECR 2003.

This policy is supported by our internal Data Protection Policy, which sets out detailed controls and procedures for safeguarding personal data.

The terms of this policy may change from time to time. It will be reviewed annually as a minimum and the latest version will always be available on our website.

Contact details:

Email: privacy@practicus.com

Address:

Practicus Limited
Riverside Barns
Remenham Church Lane
Henley-on-Thames
Oxfordshire
RG9 3DB

1. Personal data we collect

- 1.1 We collect and process personal data about candidates, clients, referees, website users and suppliers.
- 1.2 Candidate data can include name, email, phone, date of birth, address, employment history and qualifications.
- 1.3 Dependent on client requirements, further information (including special category data) may be collected from candidates we place, including RTW status, nationality, NI number, DBS status, worker health status etc.
- 1.4 Client, referee and supplier data can include name, email, phone, working address and role.
- 1.5 Information can be provided by you to us directly or obtained from third parties such as job boards, networking sites, background screening providers or company websites.
- 1.6 Website user data includes technical information (IP address, browser etc), usage data (pages visited, clicks etc) and cookie data (see our [Cookie Policy](#)).

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1.7 In line with our legitimate interests, Practicus records telephone and video calls, we also use AI to summarise these calls/meetings. These recordings are also considered your personal data. The relevant system will usually notify you ahead of the call/meeting and you may opt out of these recordings at any time.

2. How we use the data

2.1 We use candidate data to match you with job and advisory opportunities, communicate with you about roles and market insights, manage the recruitment process, conduct compliance checks, manage our relationships and improve our services.

2.2 We use client and referee data to communicate with you about our services, market insights and available talent, manage the recruitment process, match you to advisory opportunities, manage our relationships, validate candidate experience and suitability for roles, and improve our services.

2.3 For clarity, we may send you marketing emails from time to time and we rely on soft opt-in where applicable and consent where required. You can opt out at any time by clicking on the 'unsubscribe' button or emailing privacy@practicus.com.

2.4 We use supplier data to communicate with you about the contract/potential contracts we have in place.

2.5 We use website data to operate and improve our website, including analysis of usage and performance.

2.6 Telephone and video recordings, including AI summaries, are predominantly used to facilitate the recruitment process and for training and quality purposes. In rare cases, they are used in disputes that may arise.

3. Legal bases for processing

3.1 We process data where necessary for our **Legitimate Interests**, including:

- delivering recruitment and advisory services
- maintaining our database of candidates and clients
- business administration and operations
- improving our services

We carry out legitimate interest assessments to ensure our interests do not override your rights.

3.2 We process data where necessary for **Contractual Obligations**, including:

- managing placements made by entering into contracts

3.3 We process data where necessary due to **Statutory Obligations**, including:

- complying with employment tax and regulatory requirements

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- responding to lawful requests from authorities

3.4 We may have to obtain your **Consent** in specific circumstances, such as processing special category data in line with Article 9 of the UK GDPR. We ask you to not provide such data unless specifically requested.

4. Sharing personal data

Data may be shared with relevant parties as described:

- 4.1 Clients to candidates and vice versa in order to manage the recruitment process
- 4.2 Client and candidate data with our IT services providers (CRM and pay & bill platforms) and framework providers for audit purposes (e.g. Government Commercial Agency).
- 4.3 Other third parties as and when required, such as regulatory bodies. All third parties are required to process your data in line with relevant data protection legislation.
- 4.4 We would not normally share data outside of the UK, however, if we do we will ensure appropriate safeguards are in place such as transfers to countries with UK adequacy regulations or appropriate safeguards such as UK IDTA.

5. Data retention

- 5.1 We retain personal data only as long as necessary; this is set at 3 years from last meaningful contact.
- 5.2 Data is retained for longer periods where we have had contracts in place.
- 5.3 We do retain data for longer to comply with certain legislation, such as HMRC tax reporting.

6. Your rights

6.1 Under data protection law, you have the right to:

- be informed about how your data is used
- access your personal data
- correct inaccurate data
- request erasure (the right to be forgotten)
- restrict or object to processing
- data portability
- withdraw consent at any time
- lodge a complaint with the Information Commissioner's Office (ICO)

7. Data security

7.1 We implement appropriate technical and organisational measures to protect personal data. This includes access controls, encryption and staff training.

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8. Contact us

8.1 If you have any questions about this policy or how we handle your data, please contact us at privacy@practicus.com

Signed:



Sam Hawkins
CEO
Date: 21/04/2026