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, data aggregators, 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).

1.7 We may record telephone and video calls and use AI-enabled tools to transcribe and summarise conversations and meetings. Recordings, transcripts and summaries may contain personal data. Where recording takes place, participants will normally be notified and may request that recording is stopped.

1.8 We also use AI-enabled technology within our business systems and workflows to support the delivery of our recruitment and advisory services. This may involve processing personal data already held within our systems, including candidate and business contact information.

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, transcripts and AI-generated summaries are predominantly used to facilitate the recruitment process, maintain accurate records, and support training and quality purposes. They may also be used in connection with disputes where necessary.

2.7 We use AI-enabled tools to support our business operations and recruitment services. This includes assisting with administrative activities, retrieving and organising information, maintaining and updating records, identifying potential duplicate records and information, and improving the accuracy and efficiency of our systems and processes. These tools may access and process relevant personal data held within our systems for these purposes.

2.8 AI is used to assist our employees rather than replace human judgement. We do not use solely automated decision-making to determine candidate suitability, screen candidates or make recruitment and selection decisions. Such decisions remain subject to human judgement and oversight.

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
- 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 may be processed by third-party technology providers who support our business operations, including our CRM, pay and bill, communication, transcription and AI-enabled systems. Personal data may also be shared with framework providers for audit purposes (e.g. Government Commercial Agency). We require our service providers to handle personal data in accordance with applicable data protection legislation and appropriate contractual and security requirements.

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.

7.2 Where AI-enabled tools process personal data, we apply appropriate controls to protect confidentiality, restrict access and ensure responsible use. AI-generated information is subject to appropriate human oversight, and we assess the data protection and security implications of new technologies before implementation.

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



Sam Hawkins
CEO

Date: 16th November 2026