

Engage Education Privacy Policy

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This privacy policy applies to Engage Education Limited (we, us or our). We are committed to protecting your privacy. This policy explains how we collect, use and share your personal data. It applies to all personal data we handle, whether we collect it through our website, in person, or through other means.

Information we collect

Identity and contact details

- Name, address, date of birth, email address and phone number
- Professional details, including your National Insurance number

Service-related information

- Transaction details for services you've purchased from us or enquiries about our services
- Your preferences for our services and your marketing preferences
- Feedback, complaints, compliments and survey responses
- Information about experience, training and qualifications
- Compliance information, including right to work documentation

Financial and payment information

- Payroll information and banking details for the purposes of arranging payments

Digital information

- IP address and general location information derived from your IP address
- Search and browsing behaviour and user journeys
- Website usage patterns
- Cookie preferences and tracking

Recordings

- Call recordings
- Records of meetings and decisions

Professional information (for work-seekers and workers)

- Employment history and CV
- Professional experience
- Required authorisations and licences
- Professional registrations
- Information about your right to work in the UK

Special category data

This is special information that the law says is more sensitive (sometimes called "sensitive personal data"). We

handle special category data with extra care and protection, and we only collect and use these where legally permitted. This includes:

- Trade union membership
- Health information (including disability and health conditions relevant to the role)
- Criminal records of convictions and offences
- Allegations of criminal offences
- DBS check information

How we collect personal data

- **Directly from you when you:** when you interact with us, contact us, or fill out forms (including registration and application forms).
- **Automatically when you:** visit our website or interact with our online services.
- **From third parties:** job boards, service providers, business partners, previous employers and referees whose details you have previously provided to us, government organisations and organisations or people authorised by you.
- **From publicly available sources,** such as Companies House and professional networking sites such as LinkedIn.

How we use your information

Data protection law requires us to have proper legal reasons for using your personal data. We can only use your information when we have one or more of these legal bases.

- **Consent** - You have clearly agreed to us using your personal data for a specific purpose.
- **Performance of a contract** - We need to use your information to fulfil a contract with you, or because you've asked us to do something before entering into a contract.
- **Legal duty** - We must use your information to comply with the law.
- **Vital interests** - We need to use your information to protect someone's life.
- **Public interest** - We need to use your information to perform a task in the public interest or carry out official functions that have a clear legal basis.
- **Legitimate interests** - We have a genuine business reason to use your information, or a third party does, but only if this doesn't unfairly override your rights and interests. Where we rely on legitimate interests as our legal basis, we have conducted balancing tests to ensure our interests do not override your fundamental rights and freedoms. These assessments consider:
 - o The nature of our legitimate interest
 - o The impact on you
 - o Any safeguards we can implement
 - o Your reasonable expectations
 - o The broader context of our relationship

Note that we may process your personal data for more than one legal basis depending on the specific purpose for which we are using your data. We have listed the reasons we process your data and the legal basis below. Please reach out to us if you need further details about the specific legal basis we are relying on to process your personal data.

Managing your account and providing our services

[What we use your information for:](#)

- To provide you with work-finding services, including identifying suitable roles and placing you with clients
- To contact and communicate with you about our services, including responding to support requests and enquiries and dealing with complaints or claims
- To seek references from former employers
- To contact you about job opportunities and assess your suitability for those opportunities
- Internal record keeping, administrative, invoicing and billing purposes

Legal basis for using this information:

- Performance of a Contract
- Legal Duty (for billing and record-keeping requirements)
- Legitimate interests

Types of information we use:

- Identity and contact details
- Service-related information
- Financial Information
- Digital information

Client and work-seeker onboarding and verification

What we use your information for:

- To assess suitability for roles, including verifying your right to work, conducting DBS checks and other compliance checks required by law

Legal basis for using this information:

- Performance of a Contract
- Legal Duty
- Public Interest
- Legitimate interests

Types of information we use:

- Identity and contact details
- Financial information

Website enquiries and customer service

What we use your information for:

- To contact and communicate with you about any enquiries you make with us via our website

Legal basis for using this information:

- Legitimate interests

Types of information we use:

- Identity and Contact Data
- Digital Information

Business improvement and development

What we use your information for:

- Analytics, including profiling on our website
- Market research and business development

- To operate and improve our services, associated applications and associated social media platforms

Legal basis for using this information:

- Legitimate interests

Types of information we use:

- Digital Information

Marketing and communications

What we use your information for:

- To send you promotional information about our events and experiences and information that we consider may be of interest to you
- To run promotions, competitions and offer additional benefits to you

Legal basis for using this information:

- Legitimate interests

Types of information we use:

- Identity and Contact Data
- Digital Information

Recruitment and employment purposes

What we use your information for:

- To consider your application if you have applied to work with us, and to keep you up to date with its progress
- In relation to self-declared disabilities in order for us to make reasonable adjustments to support your application and any possible future employment
- In relation to any diversity or equal opportunities monitoring questionnaire data, to monitor and report on our equality and diversity composition and ensure fairness in the recruitment process
- In relation to any right to work information we collect, in order to ensure we comply with the law in employing you
- To keep you updated on any other suitable vacancies

Legal basis for using this information:

- Legitimate interests
- Legal Duty
- Consent
- Performance of a Contract

Types of information we use:

- Identity and Contact Data
- Professional Data

Legal compliance

What we use your information for:

- Comply with our legal obligations, or if otherwise required or authorised by law

Legal basis for using this information:

- Legal Duty

Types of information we use:

- All relevant Personal Data

Automated decision making and profiling

You have the right not to be subject to decisions based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. Where we use automated decision-making, we will:

- Inform you of the logic involved
- Explain the significance and envisaged consequences
- Provide you with the right to human intervention
- Allow you to express your point of view
- Enable you to contest the decision

Our disclosures of personal data to third parties

We may disclose personal data to:

Service providers

- IT service providers and CRM providers, including HubSpot and EngageNow
- Data storage providers, including Google and Microsoft
- Web hosting and server providers
- Marketing and advertising providers
- DBS processing provides including Ucheck and Verifile
- Analytics providers
- Payroll service providers and payment intermediaries
- AI tools and technology providers, including Claude AI, ChatGPT and HireAira
- Client schools and educational establishments

Professional advisers

- Bankers
- Auditors
- Insurers and insurance brokers
- Legal advisers

Business partners

- Our existing or potential agents
- Our business partners or contractors

Corporate transactions

If we merge with or are acquired by another company, or sell our business assets:

- Your information may be disclosed to our advisers
- Your information may be disclosed to the potential purchaser's advisers

- Your information may be included in the transferred assets

Legal and regulatory bodies

- Courts and tribunals
- Regulatory authorities, as required for reporting obligations
- Law enforcement officers
- Local authorities and social services were required by our safeguarding obligations

Other parties

- Third parties you have authorised
- Emergency services, when necessary
- Any other parties as required or permitted by law
- The Recruitment and Employment Confederation (REC) for audit and compliance purposes

Overseas transfers

Where we store and access your information

We store your personal data in the United Kingdom. However, your information may be transferred to locations outside the United Kingdom in these circumstances:

- When our service providers are located overseas
- When we work with overseas business partners
- When using cloud-based services or data storage solutions
- When required by law or legal proceedings

Our approach to overseas transfers

When we transfer your personal data outside the United Kingdom, we ensure it receives appropriate protection by:

- Only transferring your information to countries that UK data protection law recognises as providing adequate protection for personal data, or
- Putting in place a contract with the third party that means they must protect personal data to the same standards as the UK.
- Transferring personal data to organisations that are part of specific agreements on cross-border data transfers with the UK.

What this means for you

We only transfer the minimum amount of personal data necessary and require all recipients to:

- Protect your information to the same standards required by UK law
- Use your information only for the purposes we've agreed
- Allow us to monitor how they handle your information
- Provide you with the same rights over your information that you have under UK law

Children's Personal Data

We do not knowingly collect or process personal data from children under 13 years of age without appropriate parental or guardian consent.

If you are under 13, please do not provide personal data to us without first asking your parent or guardian for permission.

If we become aware that we have collected personal data from a child under 13 without verified parental consent, we will take steps to delete that information as quickly as possible.

Parents and guardians have the right to:

- Review any personal data we hold about their child
- Request correction or deletion of their child's personal data
- Refuse or withdraw consent for further collection or use of their child's data
- Contact us with any concerns about their child's privacy

If you are a parent or guardian and believe your child has provided us with personal data without your consent, please contact us immediately using the details provided in this policy.

Data retention

How long do we keep your information

We only keep your personal data for as long as we need it to:

- Provide our services to you
- Meet our legal, tax, accounting or regulatory obligations
- Handle any complaints or legal issues that may arise

We may keep your information for longer periods if:

- You make a complaint that we need to investigate or respond to
- We reasonably believe legal action involving our relationship with you might occur
- The law requires us to keep it for specific timeframes

How we decide retention periods

When determining how long to keep your information, we consider:

- How much information we have and how sensitive it is
- The risk of harm if the information was accessed without permission
- Whether we can achieve our purposes in other ways
- What legal, regulatory, tax or accounting rules require
- The nature of our relationship with you and the services we provide

What happens when we no longer need your information

Once we no longer need your personal data, we will securely delete or destroy it in accordance with our data retention policies and legal requirements.

Your Rights

You can request information about retention periods for your data and ask for early deletion where legally possible.

Your privacy rights and choices

Providing information

You can choose whether to provide personal data to us, however, if you don't provide certain information, we may not be able to provide some services. Let us know if you don't want to provide information and we will let you know when information is required versus optional.

Right of Access

You have the right to ask us for copies of your personal data. You can request other information such as details about where we get personal data from and who we share personal data with. There are some exemptions which means you may not receive all the information you ask for.

Right to Rectification

You have the right to ask us to correct or delete personal data you think is inaccurate or incomplete.

Right to Erasure ("Right to be forgotten")

You can request deletion of your personal data in certain limited circumstances as set out in data protection law, such as where the data is no longer necessary or has been unlawfully processed. This right is not absolute and we may be required or entitled to retain your data for legal, regulatory or legitimate business reasons.

Right to Restrict Processing

You can ask us to suspend processing where:

- You contest the accuracy of the data
- Processing is unlawful but you don't want erasure
- We no longer need the data but you need it for legal claims
- You've objected to processing pending verification of our legitimate grounds

Right to opt-out of marketing communications

You can opt-out of receiving marketing communications at any time. Each marketing communication will include an unsubscribe option. You can change your marketing preferences by contacting us. We will process your request as soon as practicable.

Right to Data Portability

Where technically feasible, you can receive your personal data in a structured, commonly used format or have it transmitted to another controller where:

- Processing is based on consent or contract
- Processing is automated

Right to Object

You can object to processing based on legitimate interests or for direct marketing purposes. We will stop processing unless we can demonstrate compelling legitimate grounds.

Right to Withdraw Consent

Where processing is based on consent, you can withdraw it at any time without affecting the lawfulness of prior processing.

How to Exercise Your Rights

To exercise any of these rights, contact us using the details below. We may ask for proof of identity and will respond within one month (extendable to three months for complex requests).

These rights are available under data protection law, though some may not apply in every situation. We'll let you know if any limitations apply when you make a request.

Making a complaint

If you have concerns about how we handle your information.

If you're unhappy with how we've used your personal data, please get in touch with us first using the contact details at the end of this policy. When you contact us:

- Give us full details about your complaint
- We'll investigate your concerns promptly
- We'll respond to you in writing, explaining what we found and what we'll do to address your complaint

Your right to complain to the regulator

You can also make a complaint directly to the Information Commissioner's Office (ICO), the UK's data protection regulator, at any time.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

You don't have to contact us first before going to the ICO, but we'd appreciate the opportunity to try to resolve your concerns directly with you.

Protecting your information

We use multiple layers of security to protect your information.

Technical safeguards

- Enterprise-grade encryption for data storage and transmission
- Regular security testing and monitoring
- Automated threat detection systems

Operational security

- Staff training on security and privacy
- Strict access controls based on job requirements
- Regular security audits and incident response procedures testing

Physical security

- Secure premises with controlled access
- Secure disposal of physical documents

- Equipment security protocols

Public information

Please note that any information you choose to share publicly on online platforms (such as comments or reviews) can be accessed and used by others. We cannot control or protect information that you make publicly available.

Cookies and analytics

Cookies and pixels

We use cookies and similar tracking technologies on our website to enhance your browsing experience and improve our services.

What are cookies?

Cookies are small text files that are stored on your device when you visit our website. They help us remember your preferences and understand how you use our site.

Types of cookies we use

- Essential cookies: Necessary for the website to function properly
- Performance cookies: Help us understand how visitors interact with our website
- Functionality cookies: Remember your preferences and settings
- Marketing cookies: Used to deliver relevant advertisements and track campaign effectiveness
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Cookie consent

When you first visit our website, you will see a cookie notice explaining our use of cookies. You can choose which types of cookies to accept through our cookie preference centre. You'll find more information about the cookies we use in our cookie pop-up.

Managing your preferences

You can change your cookie preferences at any time by:

- Using our cookie preference centre on the website
- Adjusting your browser settings to refuse or delete cookies
- Visiting our cookie policy for detailed information about specific cookies

Please note that disabling certain cookies may affect the functionality of our website and your user experience.

Google Analytics

We use Google Analytics to understand how people use our website. This involves cookies that collect information about your browsing activity. You can opt out of Google's advertising features through your Google account settings, browser add-ons, or your device's privacy settings. Google provides various tools and options to control how your data is used for advertising purposes. You can learn more about how Google uses your data and your available options on Google's privacy pages.

Meta advertising tools

We use Meta's advertising tools (such as Meta Pixel) to understand how our ads perform and to show you more relevant advertisements on Meta platforms like Facebook and Instagram when you visit our website or app. You can manage whether we connect information from our website with your Meta account for advertising purposes by adjusting your settings within your Meta account preferences.

Artificial Intelligence (AI) Technologies

Overview

We use artificial intelligence and machine learning technologies in our business operations and services, including AI tools provided by third parties. We only use these technologies when legally permitted and necessary for our business.

How we use AI

We may use AI technologies to:

- Conduct analysis and data processing
- Support CV processing and candidate matching through AI-assisted tools
- Improve and optimise our services and operations
- Automate routine tasks and communications
- Personalise your experience with our services
- Support quality assurance processes
- Assist with customer support and queries

Data protection and security

- When we work with third-party AI providers, we ensure they handle your personal data in accordance with privacy laws through contractual requirements and appropriate safeguards.

Your rights and our commitments

- Any information generated or inferred about you by AI technologies is treated as personal data, and you maintain all the rights outlined in this privacy policy. When using AI with your personal data, we commit to:

Transparency and control

- We'll inform you when AI is used to make decisions that may significantly affect you
- We maintain human oversight and review of significant AI-generated decisions
- Our staff are trained to understand AI limitations and verify outputs before relying on them
- We implement processes to verify the accuracy of AI-generated outputs

Security

- We use appropriate technical and organisational measures to maintain the security and integrity of your personal data
- We regularly test and monitor AI outputs for accuracy and reliability

Risk mitigation

- We regularly assess and document risks associated with using AI to process personal data
- We implement appropriate measures to address these risks
- We continuously monitor AI performance and regularly review their impact

Amendments

We may update this policy at any time by posting the revised version on our website. We recommend that you review our website regularly to stay current with any policy changes.

Key Contacts

Data Protection Officer - **Joseph Raffell** - GDPR@engagepartners.co.uk

Technology Success Manager - **Amy Jones** - amy.jones@engagepartners.co.uk

Transformation Director - **Nina Boniface** - nina.boniface@engagepartners.co.uk

Customer Care/Complaints Department - customercare@engage-education.com