

FIRST RECRUITMENT SERVICES – WEBSITE PRIVACY POLICY

Policy Version: 29/04/2026

OVERVIEW

www.firstrecruitment.co.uk ('our website') is provided by First Recruitment Services ('we', 'our' or 'us'). We are the controller of personal data obtained via our website, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your 'personal data') in connection with your use of our website. It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so, we are subject to the UK General Data Protection Regulation ('UK GDPR').

Given the nature of our website, we do not expect to collect the personal data of anyone under 13 years old. If you are aware that any personal data of anyone under 13 years old has been shared with our website, please let us know, so that we can delete that data immediately.

This version of our privacy policy is written for adults.

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1. WHAT THIS POLICY APPLIES TO

This privacy policy relates to your use of our website only. More specifically, it relates to the information you provide us through our website, e.g. by filling in a client vacancy form, which is not already covered under by our standard data protection and privacy policy for employees, workers, subcontractors and candidates.

2. PERSONAL DATA WE COLLECT ABOUT YOU

The personal data we collect about you depends on the particular activities carried out through our website. We will collect and use the following personal data about you:

- Your name, address and contact information, including email address, telephone number, and company details
- Your activities on, and use of, our website
- Information about how you use our website and technology systems

Sometimes you can choose if you want to give us your personal data and let us use it. Where that is the case, we will tell you and give you the choice before you give the personal data to us. We will also tell you whether declining to share that personal data will have any effect on any services we may provide you now or in the future.

3. HOW YOUR PERSONAL DATA IS COLLECTED

We collect personal data from you:

- directly, when you enter or send us information, such as when you, e.g. contact us via (including email) or request us to contact you using information you've provided us through our website, and
- indirectly, such as your browsing activity while on our website; we will collect information indirectly using the technologies explained in the section on 'Cookies and other tracking technologies' below.

4. HOW AND WHY WE USE YOUR PERSONAL DATA

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a relevant third party identified within this privacy policy.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see 'How to contact us' below).

The table below explains what we use your personal data for and why:

What we use your personal data for:	Our reasons:
Creating and managing your account with us.	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price.
Providing services to you (including information of services we can provide you), e.g. returning calls to website visitors who have completed our online vacancy submission form: firstrecruitment.co.uk/contact-us	To take steps at your request to discuss specific services we may be able to provide you, e.g. in respect of any vacancies, prior to entering into a contract. Consent will be gathered at the point of you requesting a discussion (e.g. callback) of our services or when you submit information to us through our website for such purposes. See 'Marketing – Callbacks' below for further information.
Marketing our general services to existing and former customers.	For our legitimate interests, i.e. to promote our business to prospective, existing and former customers. See 'Marketing –General' below for further information.

<p>Retaining and evaluating information on your recent visits to our website and how you move around different sections of our website for analytics purposes to understand how people use our website so that we can make it more intuitive or to check our website is working as intended.</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> • your consent as gathered by the separate cookies tool on our website—see ‘Cookies and other tracking technologies’ below • where we are not required to obtain your consent and do not do so, for our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price <p>If you have provided such a consent, you may withdraw it at any time by clearing the cookies in your browser</p>
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	<p>(this will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn).</p>
<p>Communications with you unrelated to marketing, including about changes to our terms or policies or changes to the services or other important notices.</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> • to comply with our legal and regulatory obligations • in other cases, for our legitimate interests, i.e. to be as efficient as we can deliver the best service to you at the best price.
<p>Statistical analysis to help us understand our customer base.</p>	<p>For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you at the best price.</p>
<p>Updating and enhancing customer records.</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> • to perform our contract with you or to take steps at your request before entering into a contract • if not for the above, for our legitimate interests, e.g. making sure that we can keep in touch with our customers about existing services.
<p>To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency. In such cases, information will be anonymised where possible and only shared where necessary.</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> • to comply with our legal and regulatory obligations • in other cases, for our legitimate interests, i.e. to protect, realise or grow the value in our business and assets.

HOW AND WHY WE USE YOUR PERSONAL DATA – IN MORE DETAIL

More details about how we use your personal data and why are set out in the table below.

Purpose	Processing Operation	Lawful Basis relied on under UK GDPR	Relevant Categories of Personal Data
Communications with you unrelated to marketing, including about changes to our terms or policies or changes to the products or other important notices.	Addressing and sending communications to you as required by data protection laws, i.e. UK GDPR or Data Protection Act 2018	Processing is necessary for compliance with legal obligation to which we are subject under Article 6(1)(b)	<ul style="list-style-type: none"> Your name, contact information, including email address, telephone number and company details
	Addressing and sending communications to you about changes to our	Our legitimate interests (Article 6(1)(f)), which is to be as efficient as we can	<ul style="list-style-type: none"> Your name, address and contact

	terms or policies or changes to the products or other important notices (other than those addressed above)	so we can deliver the best service to you	information, including email address and telephone number and company details
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5. MARKETING

Callback Requests

Individual visitors to our website may request callbacks in respect of any available vacancies they are seeking to fill by completing the relevant submission form: www.firstrecruitment.co.uk/contact-us. We will use your personal data to contact you via telephone for specific marketing purposes, i.e. to provide you with the information about our services which can assist you with your commercial needs prior to entering into a contract.

Consent will be gathered at the point of submission of the relevant online form (see 'How and why we use your personal data'). This means we cannot process any personal data until consent has been gathered in accordance with the UK GDPR and Data Protection Act 2018.

General

We will use your personal data to send you updates (by email or by telephone) about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in using your personal data for marketing purposes (see above 'How and why we use your personal data'). This means we do not need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at marketing@berryrecruitment.co.uk
- using the 'unsubscribe' link in emails

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell it to other organisations outside our group for marketing purposes. See 'Who we share your personal data with' below for further information into our group companies.

For more information on your right to object at any time to your personal data being used for marketing purposes, see 'Your rights' below.

6. WHO WE SHARE YOUR PERSONAL DATA WITH

We routinely share personal data with:

- Our other companies within the same corporate group as our own to ensure we provide you with the best services available, such as:
 - Berry Recruitment Group
 - Wild Recruitment Limited
 - Other third-party service providers we use to help us run our business, e.g., payroll systems and accounts systems.

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on them to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above occasionally also share personal data with:

- our and their external auditors, e.g. in relation to the audit of our or their accounts, in which case the recipient of the information will be bound by confidentiality obligations.
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations.
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised, but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

7. HOW LONG YOUR PERSONAL DATA WILL BE KEPT

We will retain your personal data on our client database (Adapt).

We will not keep your personal data for longer than we need it for the purpose for which it is used. Different retention periods apply for different types of personal data. Following the end of the relevant retention period, we will delete or anonymise your personal data. We will delete your personal data obtained via our website if you do not log in to our website for a period of 12 months.

We will usually retain client data, in perpetuity, unless and until you advise us to remove that data.

8. TRANSFERRING YOUR PERSONAL DATA OUTSIDE THE UK

Countries outside the UK have differing data protection laws, some of which may provide lower levels of protection of privacy. Data collected via our website will be transferred and stored on Hubspot, which is based in the EU, specifically Germany. We currently do not anticipate needing to transfer your personal data to any other countries outside the UK. Any changes to this position will be notified to you in accordance with the section on ‘Changes to this privacy policy’ below.

9. COOKIES AND OTHER TRACKING TECHNOLOGIES

We use technologies like cookies, pixels, and local storage to make our websites easier to use and to tailor content to be more relevant for you. This guide is designed to explain, as clearly as possible, what cookies are; the purpose of those used on Berry Recruitment Group's websites; and what options you have to control or delete them – if you decide you want to.

For further information, please see: <https://www.firstrecruitment.co.uk/cookies>.

10. YOUR RIGHTS

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your personal data	The right to be provided with a copy of your personal data.
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data.
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations.
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, e.g. if you contest the accuracy of the data.
Data portability	The right to receive the personal data you provided to us, in a structured, commonly use and machine-readable format and/or transmit the data to a third party—in certain situations.
To object to use	The right to object:

	<ul style="list-style-type: none"> • At any time your personal data being used for direct marketing (including profiling). See 'Marketing' for further details. • In certain other situations to our continued use of your personal data, e.g. where we use your personal data for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims.
Not to be subject to decisions without human involvement	The right not to be subject to decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.
The right to withdraw consents	If you have provided us with a consent to use your personal data, you have a right to withdraw that consent easily at any time. You may withdraw consent by writing to us at marketing@berryrecruitment.co.uk , and notifying us that you are withdrawing your consent. Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn.

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see 'How to contact us' below). You may also find it helpful to refer to the [Information Commissioner's Office's \(ICO\) Guidance on individual rights](#).

If you would like to exercise any of those rights, please contact us—see below: 'How to contact us'. When contacting us please:

- provide enough information to identify yourself (e.g. your full name, email address and company name) and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates.

11. KEEPING YOUR PERSONAL DATA SECURE

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it. We continually test our systems and follow top industry standards for information security.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

12. HOW TO COMPLAIN

Please contact us if you have any queries or concerns about our use of your personal data (see below 'How to contact us'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner. They may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

13. CHANGES TO THIS PRIVACY POLICY

We may change this privacy policy from time to time—when we make significant changes we will take steps to inform you, for example via by including a prominent link to a description of those changes on our website for a reasonable period or by other means, such as email.

14. HOW TO CONTACT US

You can contact us or our Data Protection officer if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

- Our general contact details: info@berryrecruitment.co.uk
- Our Data Protection Officer (DPO): Chris Chown, chris@brg.ltd