

## HEART TEACHING LTD DATA PROTECTION, PRIVACY NOTICE & RECORD RETENTION POLICY

Date of Policy: 12 January 2026

Policy Reviewed by: Faith Ashby

Next Review Date: 12 January 2026

Address: 26 Kings Hill Avenue, West Malling, ME19 4AE

DATA PROTECTION OFFICER: Justin Brown

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Web: [www.heartteaching.com](http://www.heartteaching.com)

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1. Introduction Heart Teaching LTD (“We”) is committed to protecting and respecting your privacy and personal data in accordance with the UK GDPR (UK General Data Protection Regulation) and the Data Protection Act 2018. This policy outlines how we collect, process, store, share, and retain personal data for all individuals associated with our services.
  2. Scope This policy applies to all staff, candidates, clients, suppliers, contractors, and any other individuals whose personal data we process. It covers both data protection and record retention practices, ensuring compliance with UK law.
  3. Data Controller and DPO Heart Teaching LTD is the data controller. The Data Protection Officer (DPO) is Justin Brown, responsible for overseeing data protection strategy and implementation.
  4. What data we collect We collect personal data to deliver recruitment services and associated business functions. Types of data include:
    - Candidate information (CVs, qualifications, references, right to work documents, contact details, photographs, online profiles)
    - Client contact details and company information
    - Supplier contact details
    - Employee, consultant, and temporary worker records

- Technical data from website interactions (IP address, browser, device information, clickstream, etc.)
- 5. Legal Basis for Processing We process personal data based on the following legal bases:
  - Contractual obligations
  - Compliance with legal obligations
  - Legitimate interests (e.g., recruitment and business operations)
  - Consent (explicit consent is obtained where required, e.g., marketing communications)
- 6. How we use your data
  - Recruitment services: introduce candidates to clients for permanent or temporary roles
  - Career and professional development support
  - Client and candidate communication and relationship management
  - Marketing and promotional purposes (with consent)
  - Internal administration, research, and analysis
  - Security, fraud prevention, and regulatory compliance
- 7. Sharing your data We may share personal data with:
  - Clients and candidates for recruitment purposes
  - Business partners, suppliers, and subcontractors to deliver services
  - Analytics providers and advertising networks
  - Legal, regulatory, and enforcement authorities when required by law
  - In the event of a business sale or acquisition

All third-party processing is conducted under appropriate safeguards in accordance with UK GDPR.

- 8. Data Retention Personal data is retained only as long as necessary for legitimate business purposes or as required by law. Retention criteria include:
  - Nature and sensitivity of the data
  - Accuracy and reliability
  - Legal and regulatory obligations
  - Placement or engagement status
  - Historical reference for recruitment and compliance purposes

Data may be pseudonymised, archived, or securely deleted once no longer required.

- 9. Data Security We implement technical and organizational measures to protect personal data against unauthorized access, loss, or misuse. This includes:

- Secure storage on encrypted servers
- Password protection for access to systems
- Restricted access on a need-to-know basis
- Secure transfer protocols for data shared externally

10. Your Rights Individuals have the right to:

- Access and receive a copy of their personal data
- Request correction of inaccurate or incomplete data
- Request erasure or restriction of processing
- Object to processing based on legitimate interests or for direct marketing
- Data portability to another organization where applicable
- Lodge a complaint with the Information Commissioner's Office (ICO)

Requests should be sent to [Justin@heartteaching.com](mailto:Justin@heartteaching.com).

11. Cookies and Online Tracking Our website uses cookies to improve user experience, analytics, and advertising. Information collected may include IP addresses, browsing behavior, and interaction with our site. Users can manage cookie preferences via our Cookie Notice.

12. Policy Updates Changes to this policy will be posted on our website and, where appropriate, notified via email. Users should regularly review this policy for updates.

13. Contact Questions, comments, and requests regarding this policy should be addressed to: Heart Teaching LTD 26 Kings Hill Avenue, West Malling, ME19 4AE  
Email: [Justin@heartteaching.com](mailto:Justin@heartteaching.com) Tel: 01732 494 808