




 [recruitment@grayagency.com](mailto:recruitment@grayagency.com)

 020 8059 1997

## **Privacy Policy**

Last updated: 27<sup>th</sup> June 2025

Gray Agency Ltd (“we”, “us”, or “our”) is committed to protecting and respecting your privacy.

Any mention of “our Group” refers to our subsidiaries, our ultimate holding company and its subsidiaries, and our associated companies as defined in section 1159 of the UK Companies Act 2006.

This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of data protection legislation, the data controller is:

Gray Agency Ltd

Christina Gray

Email: [christina@grayagency.com](mailto:christina@grayagency.com)

ICO Registration Number: Z9607006

## **Who we are and what we do**

We are a recruitment agency and recruitment business as defined in the

Employment Agencies and Employment Businesses Regulations 2003. We collect the personal data of the following types of people to allow us to undertake our business:

- Prospective and placed candidates for permanent or temporary roles
- Prospective and live client contacts
- Supplier contacts to support our services
- Employees, consultants, and temporary workers

We collect information about you to carry out our core business and ancillary activities.

Information you give to us or we collect about you

This is information you provide by filling in forms on our website [www.grayagency.com](http://www.grayagency.com) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, enter our database, subscribe to our services, attend events, participate in discussion boards, enter a competition or survey, or report a problem.

This may include: name, address, email address, phone number, financial information, compliance documentation, references, right to work evidence, CV, photograph, and links to professional profiles such as LinkedIn.

Information collected from our website

We collect the following:

- Technical information, including IP address, browser type and version
- Usage data including pages visited, clickstream patterns, and session times
- Interaction data such as scrolling, clicks, and navigation

Information from other sources

We may receive data from LinkedIn, job boards, CV libraries, your business card, or referrals. We will inform you within 30 days that we have your data, where it came from, and why we hold it.

We may also receive data from third parties including group companies, service providers, analytics platforms, compliance partners, credit reference agencies, and professional advisors.

### **Purposes and legal basis for processing**

We use your data:

- To fulfil contracts with you

- To provide you with services, updates or job opportunities
- To inform you about relevant services or events
- To comply with legal obligations
- For internal operations and website improvement

Legal basis includes: legitimate interest, contract, legal obligation, and consent.

#### Legitimate interests

Our legitimate interest is recruitment – introducing candidates to clients.

Maintaining a database helps us support individuals' careers and client hiring needs.

#### Consent

Where we rely on consent (e.g. marketing), we will ask for it and record your response. You can withdraw consent at any time.

#### Other uses

We may use your data to:

- Improve our site and services
- Notify you of service changes
- Ensure website security
- Make personalised recommendations

#### Automated decision-making

We do not undertake automated decision-making. Personal review is always involved in recruitment decisions.

#### Providing your data

You are not obligated to provide personal data. However, withholding it may prevent us from delivering our services.

#### Cookies

We use cookies on our website. Please see our Cookie Policy.

#### Disclosures of your data

We may share your personal data with:

- Clients (to place candidates)
- Candidates (to arrange interviews)
- Suppliers, subcontractors, and partners
- Marketing and analytics platforms (on a non-identifiable basis)

- Professional advisors, compliance platforms, and reference agencies

Data may also be disclosed:

- During a business sale
- To comply with legal obligations
- To protect rights, safety, or prevent fraud

Where we store your data

Your data may be transferred outside the UK or EEA. In such cases, we ensure appropriate safeguards are in place.

All data is stored securely. Internet transmission is never 100% secure, but we apply strict safeguards to prevent unauthorised access.

Retention

We keep your data only as long as necessary for legitimate business purposes. We consider accuracy, legal obligations, and relevance.

We may:

- Archive or delete outdated data
- Pseudonymise records on request

Our current retention policy is available on request.

Your rights

You have the right to:

- Request correction or deletion
- Object to or restrict processing
- Withdraw consent
- Access your data
- Request data portability
- Lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/concerns>)

Access

To access your data, submit a Subject Access Request to [christina@grayagency.com](mailto:christina@grayagency.com). No fee will apply unless the request is manifestly unfounded or excessive.

Changes to this notice

Any future updates will be posted on this page and, where appropriate, notified via email.

#### Contact

Questions or requests can be directed to:

Christina Gray – [christina@grayagency.com](mailto:christina@grayagency.com)