Completely Care
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Privacy Notice

Completely Care Recruitment Consultants Ltd
Updated: 2026

This Privacy Notice explains how Completely Care Recruitment Consultants Ltd (company number 05160876), trading as Completely Care ("we", "us", "our" and "ours"), collects, uses, stores and shares personal information when providing recruitment and employment business services. This information is also referred to as "personal data". We process it in accordance with the UK GDPR and the Data Protection Act 2018, as amended.

We take our obligations in respect of the privacy of personal data very seriously and we will only process personal information as detailed in this notice, unless we inform you otherwise. In order to ensure that the personal data we hold is accurate and up to date, we request that you inform us of any relevant changes to the personal information we hold about you.

We help individuals to find work and we are also an employer. Our core business activity is recruitment: we assist individuals in finding work with our hirer clients, whether this is directly or through supply by us, and we assist hirers in introducing or supplying the staff that they require. We also recruit staff to work for us to provide our recruitment services. For the purposes of this Privacy Notice, our commercial activities and services for individuals and businesses are referred to as "Recruitment Services", and our actual or potential hiring customers are referred to as "Clients".

The Directors are responsible for data protection matters within our organisation and can be contacted at:

The Directors
Completely Care Recruitment Consultants Ltd
53a West Way
Botley
Oxford
OX2 0JE

Section 1: Candidates, agency workers and applicants for internal roles

This section applies to individuals seeking or using our Recruitment Services ("Candidates"), individuals engaged for temporary assignments with Clients ("Agency Workers"), and applicants for internal roles. Employees are our internal company staff; references to Agency Workers do not mean internal employees. These descriptions do not alter anyone's legal employment status or statutory rights.

The personal data we collect or receive

We collect or receive the following information, as applicable:

- Name.
- Address.
- Email and other contact details.
- Date of birth.
- Job history, including information relating to placements through us.
- Educational history, qualifications and skills.
- Visa and other right-to-work or identity information.
- Passport.
- Bank details.
- National Insurance and tax/payroll information.
- Next of kin and family details.
- Contact details of referees.
- Personal information relating to hobbies, interests and pastimes.
- Information contained in references and pre-employment checks from third parties.
- Criminal record and DBS information, professional registration and safeguarding information where relevant and legally permitted.
- Other sensitive personal information such as health records—see “Special category and criminal offence data” below.
- Your marketing preferences.

Where we obtain your personal data

We may obtain your personal data from the following sources; this list is not exhaustive:

- You, for example a CV, application or registration form.
- A Client.
- Other Candidates.
- Online job sites.
- Marketing databases.

- The public domain.
- Social media.
- At interview.
- Conversations on the telephone or video conferencing, which may be recorded.
- Notes following a conversation or meeting.
- Our websites and software applications.

Where we obtain your personal data from a third party, we provide the relevant privacy information, including the source, within the applicable legal timeframe: normally within one month, at our first communication with you, or before first disclosure to another recipient, whichever is earlier, unless a lawful exception applies.

How we will use your personal data

The processing of your personal information may include:

- Collecting and storing your personal data, whether in manual or electronic files.
- Notifying you of potential roles or opportunities.
- Assessing and reviewing your suitability for job roles.
- Introducing and/or supplying you to actual or potential Clients.
- Engaging you for a role with us or with our Clients, including related administration such as timesheets and payroll.
- Collating market or sector-specific information and providing it to our Clients.
- Sending information to third parties with whom we have or intend to enter into arrangements related to our Recruitment Services.
- Providing information to regulatory authorities or statutory bodies, and our legal or other professional advisers, including insurers.
- Marketing our Recruitment Services.
- Retaining a record of our dealings.
- Establishing quality, training and compliance with our obligations and best practice.
- Backing up information on our computer systems.

Why we process your personal data

1. Entering into and performing a contract with you

We process personal data where necessary to perform a contract with you or take steps at your request before entering into one. For example, this may include administering your engagement and payment arrangements. A contract with a Client or another third party does not, by itself, provide this lawful basis for processing your information. Earlier recruitment activities may instead rely on legitimate interests or legal obligations as explained below.

2. Compliance with legal obligations

We must comply with a number of statutory provisions when providing our Recruitment Services which necessitate the processing of personal data. These include the Conduct of Employment Agencies and Employment Businesses Regulations 2003, which, amongst other things, require us to:

- Verify your identity.
- Assess your suitability for an external job role.
- Maintain records for specific periods.

Where we engage a person to work for us, whether directly or as supplied to a Client, there are other statutory obligations that must be complied with, including payroll, tax, social security and HMRC reporting requirements.

We are also required to comply with statutory and regulatory obligations relating to business generally, for example tax, bribery, fraud/crime prevention and data protection legislation, and cooperating with regulatory authorities such as HMRC or the Information Commissioner's Office.

3. Our legitimate interests in carrying on Recruitment Services

In providing our Recruitment Services, we carry out processing necessary for our legitimate interests, which include retaining records of our dealings and transactions and, where applicable, using those records for:

- Establishing compliance with contractual obligations with Clients or suppliers.
- Addressing queries or disputes, including establishing, exercising or defending legal claims.
- Protecting our reputation.
- Maintaining a backup of our system so that it can be restored following system failure or a security breach.
- Evaluating quality and compliance, including compliance with this Privacy Notice.
- Determining staff training and system requirements.

We also use personal data to:

- Assess suitability and contact you regarding potential opportunities and/or our services.
- Collate market information or trends, including providing analysis to potential or actual Clients.

- Source potential opportunities or roles as part of our Recruitment Services.
- Personalise your experience and our offering, whether through our website or otherwise.

We balance these legitimate interests against your rights and interests and retain information only for as long as necessary, as explained under “Retaining your data”.

4. Consent

Where we rely on consent for a specific activity, we explain the purpose and obtain valid consent. Applying for a role, providing contact details or supplying a reference does not, by itself, amount to consent.

You may withdraw consent at any time by contacting us. We will stop the processing that relies on that consent. Withdrawal does not affect the lawfulness of earlier processing. We may retain or use information separately for other purposes under an independently applicable lawful basis already explained to you, for example statutory record keeping or legal claims. We will not simply switch the same processing to another lawful basis because you withdraw consent.

What if we obtain your personal data from a third party?

Part of our business activity involves researching information relating to individuals for the purposes of filling job roles. This may include obtaining personal data from online sources, for example LinkedIn and job boards. Some information is publicly available; other information comes from sites or providers to which we subscribe. We may also receive personal information about you from hiring organisations, colleagues and former employers, or from persons for whom you have provided services or been otherwise engaged.

Where information from third-party sources is of no use to us, or where you have notified us that you do not want us to provide you with services, we shall discard it. However, we may maintain a limited record to avoid duplication of the process. Where we consider that information may be useful for providing our Recruitment Services, any processing will be in accordance with this Privacy Notice. You have the right to object to processing—please see Section 4, “Your rights”.

Special category and criminal offence data

We may process special category information, such as relevant health information for adjustments or fitness assessments and equality information where appropriate. We only do so where necessary, with an Article 6 lawful basis and an applicable Article 9 condition. Depending on the purpose, this may include employment law obligations, establishing or defending legal claims, or explicit consent where appropriate. Occupational health processing is subject to the additional legal and confidentiality requirements applicable to it.

For relevant roles, we also process criminal offence information, including DBS results and relevant safeguarding information. This is separate from special category data. We identify an Article 6 lawful basis and an applicable condition under Schedule 1 of the Data Protection Act 2018, such as necessary employment law obligations or safeguarding children and individuals at risk, where the requirements of that condition are met. We maintain an Appropriate Policy Document where required.

Checks and disclosures are appropriate to the specific role and subject to applicable eligibility and filtering rules. We explain relevant checks and the basis for using sensitive information during the recruitment or compliance process. Access and sharing are restricted to authorised recipients.

Who we share personal data with

We shall not share your personal information unless we are entitled to do so. The categories of recipients include:

- Individuals, hirers and other third parties necessary for the provision of our Recruitment Services.
- Regulatory authorities or statutory bodies where disclosure is lawful.
- Parties processing data on our behalf, including outsourced payroll providers, IT support, storage and cloud service providers, and background screening providers.
- Legal and professional advisers.
- Insurers.

Client compliance sharing

Where necessary and lawful, we share relevant personal information and supporting documents with authorised Client contacts to meet recruitment, audit, safeguarding, regulatory and right-to-work responsibilities. This may include qualifications, registration and training records, references, identity and right-to-work evidence, and relevant health or criminal offence information where legally permitted.

We limit disclosure to what is necessary and use confirmation or redacted evidence where sufficient. DBS certificates and criminal record information are only disclosed to recipients legally entitled to receive them.

Automated compliance processes and AI

We are developing automated compliance processes, including AI tools, to assist with document checking, identifying missing or inconsistent information, and recruitment administration. When used, these tools support our Recruitment Services and compliance obligations under the relevant lawful bases described above.

Outputs that inform a Candidate's or Agency Worker's compliance status, suitability or ability to undertake work receive meaningful review by authorised human operators before a decision is finalised. Reviewers consider the evidence and can correct or override an output. We do not make these decisions solely through automated processing.

You may contact us to question an assessment, provide corrections or request human reconsideration. We will provide further privacy information before any materially different use of your information.

Section 2: Individuals working for third parties

This section applies where you are an individual working for a third party with whom we have dealings, for example a Client or a payroll company.

The personal data we collect or receive

We may collect:

- Your contact information, including your full name, job role, contact telephone number and email.
- Your statements and opinions about Candidates and/or other personnel, for example a reference.
- Information relating to our relationship with you or the party for whom you work, including records of meetings or discussions.
- Your marketing preferences.

Where we obtain your personal data

We may obtain your personal data from the following sources; this list is not exhaustive:

- You, including where you have provided contact details or other information for the purposes of using our Recruitment Services.
- Staff or other representatives of the organisation you represent.
- Candidates.
- Marketing databases.
- Social media.
- The public domain.
- Telephone or video conversations with you or others, which may be recorded, or meetings.
- Notes following conversations or meetings.

How we will use your personal data

We process your personal data in the context of our dealings with the third party for whom you work and as part of our Recruitment Services. Processing may include:

- Collecting and storing your personal data, whether in manual or electronic files.
- Using the data to communicate with you.
- Sending information to third parties with whom we have or intend to enter into arrangements related to our Recruitment Services.
- Actions necessary to fulfil obligations under a contract between us and the third party you work for.

- Collating market or sector-specific information and providing it to our Clients.
- Providing information to regulatory authorities or statutory bodies and our legal or other professional advisers, including insurers.
- Retaining records of our dealings with you and the organisation you represent.
- Establishing quality, training and compliance with our obligations and best practice.

Why we process your personal data

1. Compliance with legal obligations

We must comply with statutory provisions when providing our Recruitment Services which necessitate the processing of personal data. These include the Conduct of Employment Agencies and Employment Businesses Regulations 2003, which, amongst other things, require us to assess the suitability of Candidates and obtain information from Clients.

We are also required to comply with statutory and regulatory obligations relating to business generally, for example tax, bribery and fraud/crime prevention legislation, and cooperating with regulatory authorities such as HMRC.

2. Our legitimate interests in carrying on Recruitment Services

Our legitimate interests include using your personal data to:

- Contact you regarding our Recruitment Services.
- Assess the suitability of Candidates and roles, for example through references or other feedback.
- Collate market information or trends, including providing analysis to potential or actual Clients.
- Provide our Recruitment Services and meet our obligations towards the party you represent or other Clients or suppliers.
- Personalise your experience and our offering, whether through our website or otherwise.

We also retain records of our dealings and transactions and, where applicable, use those records for:

- Establishing compliance with contractual obligations with Clients or suppliers.
- Addressing queries or disputes, including establishing, exercising or defending legal claims.
- Protecting our reputation.
- Maintaining a backup of our system so that it can be restored following system failure or a security breach.
- Evaluating quality and compliance, including compliance with this Privacy Notice.

- Determining staff training and system requirements.

We balance these legitimate interests against your rights and interests and retain information only for as long as necessary, as explained under “Retaining your data”.

3. Consent

Where we rely on consent for a specific activity, we explain the purpose and obtain valid consent. Providing contact details or supplying a reference does not, by itself, amount to consent.

You may withdraw consent at any time by contacting us. We will stop the processing that relies on that consent. Withdrawal does not affect the lawfulness of earlier processing. We may retain or use information separately for other purposes under an independently applicable lawful basis already explained to you, for example statutory record keeping or legal claims. We will not simply switch the same processing to another lawful basis because you withdraw consent.

What if we obtain your personal data from a third party?

Part of our business activity involves researching information for the purposes of finding and filling job roles. This may include obtaining personal data from job boards, advertisements, LinkedIn or other social media. Some information is publicly available; other information comes from sites or providers to which we subscribe. We may also receive personal data about you from hiring organisations, colleagues and former employers, or from persons for whom you have provided services or been otherwise engaged.

Where information from third-party sources is of no use to us, we shall discard it. However, we may maintain a limited record to avoid duplication of the process. Where we consider that information may be useful for providing our Recruitment Services, any processing will be in accordance with this Privacy Notice. You have the right to object to processing—please see Section 4, “Your rights”.

Special category data

We do not normally need special category information about Client contacts, referees or other business contacts. Where it is necessary, for example to arrange an adjustment or handle a legal claim, we use an Article 6 lawful basis and an applicable Article 9 condition, such as employment law obligations, legal claims or explicit consent where appropriate, and any required additional safeguards. Please do not provide unnecessary sensitive information.

Who we share personal data with

We shall not share your personal data unless we are entitled to do so. The categories of recipients include:

- Candidates and other third parties necessary for the provision of our Recruitment Services.
- Regulatory authorities or statutory bodies where disclosure is lawful.
- Parties processing data on our behalf, including outsourced payroll providers, IT support, storage and cloud service providers, and background screening providers.

- Legal and professional advisers.
- Insurers.

Section 3: All personal data

Transfer of data to other jurisdictions

We do not currently arrange international sharing as part of our recruitment and supply activities. We also consider international processing and access when assessing technology and support providers.

If a restricted transfer outside the UK is required, we ensure that a valid UK transfer route is in place before the transfer occurs. This may include UK adequacy regulations or appropriate safeguards, such as the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses, together with any required transfer assessment and additional protections.

Where applicable, details of the relevant safeguards and how to obtain a copy are available from our data protection contact. We will update the relevant privacy information where necessary.

If you do not wish to provide us with necessary data

There may be circumstances where we require you to provide information necessary to meet statutory or contractual obligations or perform our Recruitment Services. If you do not wish to provide information we request, please notify us.

As a result, we may be unable to provide you or the party you represent with a Recruitment Service. Where providing the information is a contractual requirement, failure to provide it may also affect compliance with that contract.

DBS, identity and compliance checks and group sharing

We use our wholly owned subsidiary, Completely DBS Limited, which also operates under the trading names Completely DBS, Completely Checked and Completely CRB, to support DBS checking and recruitment compliance processes.

We also use external screening providers, including DBS umbrella bodies and government-approved digital identity verification providers, where appropriate.

We may share the personal information and supporting documents necessary for these providers to carry out the relevant checks. This may include identity documents, address history, right-to-work information and criminal record information where legally permitted.

We explain the checks required during the recruitment or compliance process. Where a provider processes information as a separate data controller, its own privacy notice also explains how it handles that information.

Any sharing within our group is limited to what is necessary and lawful for the purposes described in this notice, including relevant shared administration and systems.

In the event of a sale, merger, liquidation, receivership or the transfer of all or part of our assets to a third party, we may need to transfer your information to a third party. Any transfer will be subject to the third party's agreement to this Privacy Notice and processing only in accordance with this Privacy Notice.

Data security and confidentiality

We use appropriate technical and organisational measures to protect personal data against unauthorised access, disclosure, loss, alteration or destruction.

Cookies

A cookie is a small file of letters and numbers downloaded onto your device when you visit a website, which can enable the website to tailor its offerings to your preferences.

Our website may use analytics technologies, including Google Analytics, to help us understand how the website is used and improve it. Depending on their configuration, these technologies may process information such as online identifiers, device information and browsing activity; this is not necessarily anonymous.

Where consent is required, optional technologies will only be used with your consent. Where we rely on a lawful statistical purposes exception, we provide clear information and a simple, free way to object. You can contact us about your cookie choices. Any website cookie controls and further cookie information should be read alongside this notice.

Retaining your data

We retain personal data in accordance with our Data Retention Schedule. In most circumstances, recruitment and engagement records are retained for no more than six years after we last provide services or otherwise engage with you. This is not a blanket retention period for all documents.

We set periods by reference to the type of information, purpose, statutory record-keeping requirements, safeguarding requirements and the time needed to establish or defend legal claims. DBS certificates and sensitive supporting documents are subject to their specific handling and retention requirements and are not routinely retained for six years simply because other records are.

Longer retention applies only where necessary and justified, for example a continuing legal obligation or legal hold. Retaining a profile for future opportunities is subject to periodic review and a continuing lawful basis; having specialist skills does not justify indefinite retention.

You may ask us for details of the retention period applicable to your information or request earlier deletion. These requests may be made verbally or in writing.

Changes to this Privacy Notice

This Privacy Notice is regularly reviewed and may be updated from time to time to reflect changes in our business or legal or commercial practice. Where an update is relevant to our processing of your data, we shall notify you.

Section 4: Your rights

We take the protection of your personal data very seriously. Subject to applicable conditions and exemptions, your rights include:

- Requesting a copy of the personal data we hold.
- Objecting to processing based on legitimate interests, subject to any overriding compelling grounds for continued processing.
- Requesting restriction of processing in certain circumstances.
- Requesting erasure where continued use of your data cannot be justified.
- Exercising applicable rights concerning decisions that significantly affect you and are made solely by automated processing.
- Withdrawing consent at any time where we rely on it. We stop the processing based on consent; separate processing for other purposes may continue as explained above.
- Requesting correction of inaccurate or incomplete data.
- Requesting that data provided by you and processed by automated means is transferred to you or another controller, where processing is based on consent or performance of a contract and the applicable conditions are met.
- Making a complaint to the Information Commissioner's Office.
- Objecting at any time to the use of your personal data for direct marketing, including related profiling.

Requests may be made verbally or in writing and do not need to use particular legal wording. We respond without undue delay, normally within one month, subject to applicable legal timing rules and permitted extensions, which we will explain where relevant. Requests are normally free of charge; a fee or refusal is only used where legally permitted.

If you request erasure or ask us to cease processing, we may retain a record of your request and the action taken to evidence compliance and minimise the prospect of processing your information again if it is received from a third-party source.

If you have questions about your rights or wish to exercise them, please contact:

The Directors
Completely Care Recruitment Consultants Ltd
53a West Way
Botley
Oxford
OX2 0JE

Complaints

If you are dissatisfied with how your personal data is handled, please contact The Directors using the details above.

We acknowledge data protection complaints within 30 days, investigate appropriately without undue delay, keep you informed and communicate the outcome without undue delay.

You may also complain to the Information Commissioner's Office at ico.org.uk.