



DATA PROTECTION & GDPR COMPLIANCE POLICY

1. Policy Statement.

Hadsul Limited is committed to full compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. We recognise the importance of safeguarding personal data and maintaining trust with all stakeholders — including candidates, clients, staff, suppliers, and regulators. This policy outlines how we collect, process, store, share, and dispose of personal data in a lawful, secure, and accountable manner.

2. Scope

This policy applies to:

All employees, contractors, and agency workers.

All personal data handled during recruitment, onboarding, placement, and business operations.

All data processing systems, whether electronic or manual.

All third-party processors, including umbrella companies, payroll services, and cloud-based software.

3. Data Protection Principles.

We adhere to the following UK GDPR principles:

1. Lawfulness, fairness and transparency.

2. Purpose limitation.

3. Data minimisation.

4. Accuracy.

5. Storage limitation.



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6. Integrity and confidentiality.

7. Accountability.

4. Lawful Basis for Processing.

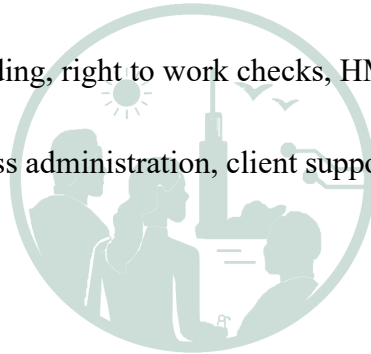
We rely on the following legal bases:

Consent (e.g. for marketing or CV retention beyond legal limits).

Contractual necessity (e.g. placement agreements, payroll processing).

Legal obligation (e.g. safeguarding, right to work checks, HMRC).

Legitimate interest (e.g. business administration, client support).



5. Data We Collect.

We may collect and process the following:

Identity data: Name, DOB, NI number, photo ID, DBS certificate.

Contact data: Email, address, phone number, emergency contact.

Employment data: CV, references, training, right to work status.

Financial data: Bank details, tax code, payroll information.

Sensitive data: Health declarations, disabilities, safeguarding concerns (processed only under strict conditions).

6. Data Subjects' Rights.

Under the UK GDPR, individuals have the right to:

Be informed about how their data is used.

Access their personal data.

Rectify incorrect or outdated data.

Request data deletion (where applicable).

Restrict processing or object to its use.

Data portability (where relevant).

Not to be subject to automated decisions without safeguards.

Requests must be directed to:

manager@extramilehomecareagency.com

We aim to respond within one month.



7. Data Security.

We implement and review appropriate technical and organisational measures, including:

Encrypted cloud systems and password-protected files.

Access restrictions based on role.

Secure shredding of physical records.

Regular staff training on confidentiality.

Immediate breach reporting protocol.

8. Data Retention.

Data will be retained as follows:

Candidate files: 6 years post last engagement.

Payroll/financial data: 6 years (HMRC requirement).

Complaint/incident records: 6 years or as legally required.

CVs not leading to engagement: 1 year with consent.

Data no longer required will be securely destroyed.

9. Data Sharing

We only share personal data:

With client organisations for placement purposes.

With umbrella/payroll companies under contract.

With regulatory authorities (e.g. CQC, HMRC, Home Office) when legally required.

All third parties are vetted, contractually bound, and audited for compliance.

10. Data Breaches.

All staff must report actual or suspected breaches immediately to the Data Protection Lead.

Breaches will be:

Logged and investigated within 24 hours.

Reported to the ICO within 72 hours if risk to individuals exists.

Accompanied by remedial action and risk assessment.

11. Roles & Responsibilities.

Data Protection Officer (DPO): Muhsin Senyonga.

Compliance Officer: Oversees audits, updates policies, and ensures training.

All Staff: Must comply with this policy, complete data protection training, and report concerns.

12. Auditing and Monitoring.

Regular internal audits and spot checks will be carried out to ensure:

Accuracy of records.

Lawful basis for all processing.

Up-to-date privacy notices.

Contractual compliance with third parties.

Audit findings will be documented and actions tracked through to resolution.

13. Policy Review

This policy will be:

Reviewed annually or upon changes in law/regulations.

Updated as necessary with version control.

Communicated to all staff via training and company handbooks.

14. Contact and Further Information

For questions, subject access requests, or concerns, contact:

admin@extramilehomecareagency.com

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Approved by:

MUHSIN SENYONGA

Muhsin Senyonga.

Director & Compliance Officer.

Hadsul Limited.



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