

 <i>Temporary Staffing Solutions</i>	FlexStaff Limited Flat 173, Uncle Wembley 3 Park Lane, Wembley, London HA9 7FN Registered No. 17125344 privacy@flexstaff.co.uk
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PRIVACY POLICY

Version 1.2 | Effective: April 2026

This Privacy Policy explains how FlexStaff Limited collects, uses, shares, and protects your personal data when you use the FlexStaff website (flexstaff.co.uk) and mobile application. It applies to all users: Agency Workers ("Workers"), Internal Workers, and designated contacts of client businesses. Please read it carefully. If you have any questions, contact us at privacy@flexstaff.co.uk.

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1. WHO WE ARE AND HOW TO CONTACT US

FlexStaff Limited ("FlexStaff," "we," "us," "our") is the data controller for the personal data we process about you. We are registered in England and Wales under company number 17125344. Our registered address is 6th Floor, Uncle Wembley, 3 Park Lane, Wembley, London, HA9 7FN.

General enquiries	hello@flexstaff.co.uk
Data protection/privacy	privacy@flexstaff.co.uk
Postal address	Data Protection, FlexStaff Limited, 6th Floor, Uncle Wembley, 3 Park Lane, Wembley, London, HA9 7FN

Supervisory authority	UK Information Commissioner's Office (ICO) ico.org.uk - 0303 123 1113
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You have the right to lodge a complaint with the ICO if you are unhappy with how we handle your personal data. We would, however, welcome the opportunity to address your concerns first. Please contact us at privacy@flexstaff.co.uk before approaching the ICO.

2. ABOUT THIS POLICY

This Privacy Policy describes how FlexStaff collects, uses, shares, and protects your personal data when you use the FlexStaff Platform (the website at flexstaff.co.uk and the FlexStaff mobile application). It applies to:

- Agency Workers ("Workers"): individuals who register on the Platform to find temporary work
- Internal Workers: individuals employed by a client business who use the Platform for workforce planning purposes
- Designated contacts of client businesses ("Business Users"): people who register on behalf of a company using FlexStaff to find or manage workers

We collect and process personal data only when we have a valid legal basis to do so under UK GDPR and the Data Protection Act 2018. The legal bases we rely on are:

Consent	You have given clear consent for a specific purpose. You may withdraw consent at any time without affecting prior processing. To withdraw consent, contact privacy@flexstaff.co.uk or use the settings in your account.
Contract performance	Processing is necessary to fulfil our contract with you (e.g., matching you with Assignments, processing your pay, and providing the Application).
Legal obligation	Processing is necessary to comply with our legal obligations (e.g., HMRC reporting, right-to-work verification, payroll records).
Legitimate interests	Processing is necessary for our legitimate business interests or those of a third party, where those interests are not overridden by your rights. We will always tell you when we rely on this basis.
Legal claims	Processing is necessary for us to establish, exercise, or defend a legal claim.

The Platform contains links to third-party websites. We are not responsible for the privacy practices of those sites and encourage you to review their privacy policies before submitting any personal data.

3. WHAT PERSONAL DATA WE COLLECT

3.1 Data we collect from everyone

Regardless of your role, we may collect:

- Information you provide directly when registering, using our services, uploading documents or contacting us
- Correspondence records if you contact us by email, phone or through the Application
- Survey responses if you choose to participate in research

- Platform usage data: IP address, device type and operating system, browser version, traffic and location data, click-stream activity, session data and the features you use: subject to your cookie preferences (see Section 10)
- Referral scheme data: if you participate in our referral scheme, we will link referrals to your user profile

3.2 If you are an Agency Worker

Standard personal data

As part of onboarding and registration:

- Biographical and contact details: name, date of birth, nationality, gender, postal address, email, phone number, and a photograph if you choose to upload one
- Employment and qualification details: CV, work history, education, certifications, driving license, other licenses (SIA, etc.) category, skills, ratings and references
- Right-to-work documentation: National Insurance number, passport and/or visa details, share code (where applicable), immigration status
- Financial information: bank account name, number and sort code for payroll purposes
- Tax information: starter declaration, tax code, PAYE reference
- Workplace information: shift history, attendance records, timesheets, hours worked, ratings given and received

Additional data we may process

Depending on the Assignment or client requirements:

- Mobility: driving licence details, vehicle information
- Personal attributes: visible tattoos or piercings where relevant to a role
- Emergency contacts and family status: next-of-kin details for emergency purposes and tax/benefit administration
- Benefits data: details relevant to statutory sick pay, family allowances or other benefits we administer on your behalf

Sensitive (special category) personal data

We only process sensitive personal data where legally required or justified. This may include:

- Health information: relevant medical conditions, fitness-for-work certificates, allergy information. Legal basis: explicit consent or employment law obligation
- Biometric data: photographs and, where used for identity verification, facial recognition data. Legal basis: explicit consent (obtained separately during onboarding)
- Criminal records: where justified by the nature of the role or client requirements. Legal basis: explicit consent
- Racial or ethnic origin, religion, trade union membership: only where strictly necessary and justified. Legal basis: explicit consent or substantial public interest

Important: We will always ask for your explicit consent before processing sensitive personal data. You may withdraw that consent at any time by contacting privacy@flexstaff.co.uk, though this may affect our ability to place you in certain Assignments.

3.3 If you are an Internal Worker

Where you use the Platform as an Internal Worker (employed by a client company and using FlexStaff's Workforce Planning feature):

- Biographical and contact details: name, date of birth, email address, telephone number, work address
- Workforce management data: shift planning records, scheduling data, time logs, attendance tracking, ratings

Where you voluntarily provide additional information, we may collect the same types of data as for Agency Workers (section 3.2).

3.4 If you are a Business User

If you are a designated contact using the Platform on behalf of a client company:

- Name, job title, email address, phone number
- Communication records relating to our business relationship

4. WHY WE PROCESS YOUR DATA AND THE LEGAL BASIS

4.1 Agency Workers: purposes and legal bases

Purpose	Legal Basis
Registering you on the Platform and verifying your identity and right to work	Contract performance; Legal obligation (Immigration Act 2014)
Matching you with suitable Assignments via our automated matching system	Contract performance
Providing Hirers with your profile details to consider for Assignments	Contract performance; Legal obligation
Processing your pay, including PAYE and NI deductions	Contract performance; Legal obligation
Processing Tips Allocations in accordance with the Employment (Allocation of Tips) Act 2023	Contract performance; Legal obligation
Administering holiday pay, statutory sick pay, pension auto-enrolment, and other statutory entitlements	Contract performance; Legal obligation
Verifying criminal history or financial probity for specific roles	Explicit consent
Processing biometric data for identity verification	Explicit consent
Processing ratings you give and receive	Legitimate interests (platform integrity and service quality)
Sending you payslips, payment confirmations and employment updates	Legal obligation; Contract performance
Managing the Strike system and disciplinary process	Legitimate interests (platform integrity); Contract performance
Communicating service changes and administrative matters	Legitimate interests (service management)
Sending you marketing communications about FlexStaff services and opportunities	Legitimate interests (for our own services); Consent (for third-party partner offers)
Operating the referral programme	Consent
Aggregating anonymised data for service improvement and labour market analysis	Legitimate interests (service improvement)
Analysing non-anonymised usage data in isolated cases to improve our systems	Legitimate interests (service refinement)

4.2 Internal Workers: purposes and legal bases

Purpose	Legal Basis
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Displaying shifts and assignments matching your profile	Contract performance
Facilitating shift assignments and attendance tracking	Contract performance
Processing ratings and workforce analytics	Legitimate interests
Sending employment updates, such as shift confirmations	Contract performance
Sending FlexStaff marketing communications (opt-in/opt-out available)	Legitimate interests (own services); Consent (third-party)

4.3 Business Users: purposes and legal bases

Purpose	Legal Basis
Providing the Platform's services to your company, including matching, shift management and invoicing	Contract performance
Managing our business relationship with your company	Contract performance; Legitimate interests
Conducting credit checks on your company, where appropriate	Legitimate interests (risk management)
Sharing your contact details with Workers for operational coordination	Contract performance

5. AUTOMATED DECISION-MAKING AND PROFILING

FlexStaff uses an automated matching system (the "Matching Application") to facilitate the connection between Workers and Hirers. The Matching Application analyzes and evaluates data you and Hirers have provided, including:

- Your job profile and stated skills
- Your ratings and attendance history
- Your engagement with the Platform (applications submitted, jobs worked)
- Hirer preferences and job requirements

The Matching Application uses this data to determine which Workers' profiles are shown to which Hirers in response to job postings. This process involves automated profiling that can affect whether you are presented to a Hirer.

We have implemented appropriate safeguards to protect your rights, freedoms, and legitimate interests in connection with this automated processing. In particular:

- The Matching Application assists, not replaces, Hirer selection. The final hiring decision is always made by the Hirer.
- You have the right to request human review of any significant automated decision that affects you. To exercise this right, contact privacy@flexstaff.co.uk.
- You have the right to contest any such decision and to express your point of view.

For more information about how the Matching Application works, or to request a human review of a decision, please contact privacy@flexstaff.co.uk.

6. WHO WE SHARE YOUR DATA WITH

6.1 Client businesses (Hirers)

Once you have been matched with a client business, we will share relevant personal data with that business to enable the Assignment, including:

- Identity information: name, photograph (if provided), contact details
- Suitability information: skills, ratings, prior Assignment history, qualifications and right-to-work status

Client businesses that receive your data act as independent data controllers for that data and are responsible for their own compliance with UK GDPR. We encourage you to review the privacy policies of any businesses you are matched with.

6.2 HMRC and government authorities

We are required by law to disclose certain personal data to HMRC and other tax and social security authorities, including your name, NI number, earnings, tax deductions, and employment records. We will always ensure such disclosures are lawful and proportionate.

6.3 Our service providers and technology partners

We use a limited number of carefully selected technology providers to operate the Platform, including cloud hosting, payroll software, identity verification, push notification, and email delivery services. All providers are bound by data processing agreements and may only use your data to provide services to us.

- Cloud infrastructure: data is stored on encrypted, access-controlled servers in the UK or EEA
- Payroll bureau: where FlexStaff uses a third-party payroll bureau to process PAYE, necessary payroll data (name, NI number, bank details, earnings) will be shared for that purpose only
- Identity verification: where we use a third-party provider for right-to-work or identity checks, relevant documents and biometric data will be shared with that provider

6.4 Law enforcement and regulators

We may disclose your personal data to the courts, regulators, or law enforcement agencies where we are legally required to do so or where disclosure is necessary to prevent or detect crime. Where permitted, we will notify you before responding to such a request.

6.5 Business sale or restructuring

If FlexStaff is subject to a merger, acquisition, or restructuring, your personal data may be transferred to the relevant entity. We will ensure that any such transfer is subject to appropriate safeguards and that your data is used only for the same purposes set out in this Policy.

6.6 Fraud prevention

We may share personal data with fraud prevention agencies where we have reason to suspect fraud or misrepresentation. Information held by fraud prevention agencies may be used by other organisations to prevent fraud and money laundering.

6.7 What we do NOT do

FlexStaff does not sell your personal data to third parties. We do not share your data with advertisers or marketing agencies for their own purposes. We do not use your data to build profiles for purposes unrelated to your use of the FlexStaff Platform.

7. INTERNATIONAL DATA TRANSFERS

FlexStaff is a UK-based company and primarily processes data within the United Kingdom. However, some of our technology service providers may store or process data outside the UK or EEA (for example, where cloud services use data centres in the United States or other countries).

Where such transfers occur, we ensure they are protected by one or more of the following safeguards:

- An adequacy decision by the UK Government recognising that the destination country provides equivalent data protection
- Standard Contractual Clauses (SCCs) approved by the UK ICO
- The UK International Data Transfer Agreement (IDTA)
- Binding Corporate Rules (where applicable for group companies)

You may request further information about the safeguards we use for international transfers or request a copy of the relevant agreements by contacting privacy@flexstaff.co.uk.

8. HOW LONG WE KEEP YOUR DATA

We retain personal data for only as long as necessary to fulfil the purpose for which it was collected or as required by law. The table below sets out our specific retention periods:

Data Category	Retention Period	Reason
Payroll and PAYE records	6 years after the tax year they relate to	HMRC statutory requirement (Taxes Management Act 1970)
Right-to-work documents	Duration of engagement + 2 years	Immigration, Asylum and Nationality Act 2006
Assignment and timesheet records	6 years after the Assignment ends	Limitation period for civil claims (Limitation Act 1980)
Worker ratings and performance data	Duration of active account + 3 years	Legitimate interest in maintaining platform integrity
Bank account details	Until updated or account deleted, then 6 years	Payroll audit trail
Contact and profile information	Duration of active account + 2 years after last activity	Ability to respond to queries and comply with legal obligations
Biometric data (identity verification)	Until verification complete, then deleted within 30 days	Data minimization principle: no ongoing need
Application logs and usage data	12 months	Security monitoring and service improvement
Correspondence records	3 years from last communication	Dispute resolution and legal claims
Sensitive personal data (health, criminal)	Only for duration of the relevant Assessment/Assignment	Data minimization: consent-based: deleted on consent withdrawal

When data is no longer needed, it is either securely and irreversibly deleted or anonymized so that it can no longer be linked to you. We restrict access to personal data to those employees and service providers who need it to perform their functions.

9. HOW WE KEEP YOUR DATA SECURE

FlexStaff takes data security seriously. We implement commercially reasonable technical and organizational measures to protect your personal data against unauthorized access, loss, alteration, or disclosure. These include:

- Encryption of data in transit (TLS/HTTPS) and at rest
- Access controls and role-based permissions so only authorised personnel can access personal data
- Regular security testing and vulnerability assessments
- Staff training on data protection and security
- Incident response procedures

No data transmission over the Internet can be guaranteed to be 100% secure. If you suspect your account has been compromised, please contact us immediately at privacy@flexstaff.co.uk.

You are responsible for keeping your login credentials (username and password) confidential. Do not share them with anyone. Any loss or damage caused by disclosure of your credentials to a third party is your responsibility.

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the ICO within 72 hours and, where required, we will notify you without undue delay.

10. COOKIES AND TRACKING TECHNOLOGIES

The FlexStaff website and app use cookies and similar tracking technologies. Cookies are small data files placed on your device that help us operate the Platform and understand how it is used.

Cookie Type	Purpose	Consent Required?
Strictly necessary	Essential for the Platform to function: authentication, session management, security	No, these cannot be disabled
Performance/analytics	Help us understand how the Platform is used, measure performance and identify areas for improvement	Yes, you can opt out via our Cookie Preferences tool
Functional	Remember your preferences (e.g. language, location) to personalise your experience	Yes, you can opt out via our Cookie Preferences tool

You can manage your cookie preferences at any time via the Cookie Preferences tool on the FlexStaff website, or by adjusting your browser settings. Note that disabling certain cookies may affect Platform functionality.

11. YOUR RIGHTS

Under UK GDPR and the Data Protection Act 2018, you have the following rights regarding your personal data. All rights can be exercised by contacting privacy@flexstaff.co.uk. We will respond within one month of receiving your request (the timeframe may be extended by a further two months for complex requests, in which case we will notify you).

Right	What it means
Right of access	You can request a copy of the personal data we hold about you, free of charge for the first request. Repeat, excessive or unfounded requests may be subject to a reasonable fee.
Right to rectification	You can ask us to correct any inaccurate or incomplete personal data we hold about you. You can also update many details directly in your account settings.
Right to erasure	You can ask us to delete your personal data where: (a) it is no longer needed for the purpose it was collected; (b) you have withdrawn consent, and there is no other legal basis; (c) you have objected, and we have no overriding legitimate interest. Note: We are required by law to retain certain data (e.g., HMRC records) even after your account is closed.
Right to restrict processing	You can ask us to pause processing your data in certain circumstances, for example, while a rectification request is resolved or while we assess an objection.
Right to data portability	Where processing is based on consent or contract and carried out automatically, you can request your data in a structured, commonly used, machine-readable format (e.g., CSV).
Right to object	You can object to processing based on legitimate interests, including profiling for direct marketing. We will stop processing unless we have compelling legitimate grounds that override your interests.
Rights regarding automated decisions	You have the right not to be subject to a decision based solely on automated processing that has a significant effect on you. See Section 5 for how to request human review.
Right to withdraw consent	Where processing is based on your consent, you may withdraw it at any time without affecting the lawfulness of processing before withdrawal. Withdrawal may affect some services.
Right to complain	You have the right to lodge a complaint with the ICO (ico.org.uk / 0303 123 1113). We would welcome the opportunity to address your concerns. Please contact privacy@flexstaff.co.uk .

When you exercise your rights, we may need to verify your identity before acting. This is to protect you and ensure we do not disclose data to unauthorized parties.

Please note that exercising some rights (such as erasure or restriction) may affect our ability to provide services to you, including placing you in Assignments or processing your pay. We will always explain the implications before taking any action.

12. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time to reflect changes in our services, legal requirements, or best practices. When we make material changes, we will:

- Update the version number and effective date at the top of this Policy
- Notify registered users via the Application or email
- Where changes affect the legal basis for processing or introduce new types of processing, seek your consent where required

We encourage you to review this Policy periodically. The current version is always available at flexstaff.co.uk/privacy.

This Privacy Policy was last reviewed and updated in April 2026. If you have any questions about this Policy or how we handle your data, please contact privacy@flexstaff.co.uk.