



**SOTERIA  
PEOPLE**  
PROTECT - ENVELOP - NURTURE

# **SOTERIA PEOPLE**

**POLICY  
DOCUMENT**

**GDPR Policy**

# GDPR Data Protection Policy

## 1. Introduction

Soteria People Ltd is committed to protecting the privacy and security of personal data. This GDPR Data Protection Policy outlines how we collect, store, process, and protect personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

As a recruitment business, we handle personal data from candidates, clients, employees, and third parties to provide recruitment services. This policy applies to all individuals whose personal data we collect in connection with our recruitment activities.

## 2. Who We Are

Soteria People Ltd operate solely in the UK and our primary business activity involves sourcing, screening, and placing candidates into roles within the residential child care sector.

Registered Office: Suite 2 Station House,  
Central Way, Winwick Street, Warrington,  
WA2 7FW

Company Number: 16092612

Data Protection Officer (DPO): Mr Robert Taylor ([info@soteriapeople.co.uk](mailto:info@soteriapeople.co.uk))

Date Protection Registration: ZB860865

## 3. Data We Collect

We collect, store, and process personal data necessary for recruitment services, which includes but is not limited to:

### A. Candidate Data

- Name, address, contact details
- CVs, work history, qualifications, and skills
- Employment preferences
- Salary expectations and availability
- Right-to-work documentation
- References and background check data (if applicable)

### B. Client Data

- Company name and contact details
- Job role requirements
- Business communications

### C. Website and Communication Data

- Contact details provided via our website forms
- IP addresses and cookies for website analytics

## 4. How We Use Personal Data

We process personal data for the following purposes:

Recruitment Services: Assessing candidate suitability for roles, submitting CVs to employers, arranging interviews, negotiating salary packages.

Legal Compliance: Ensuring right-to-work verification, tax obligations, and employment laws

Marketing Communications: Sending job alerts and relevant recruitment-related news (with consent)

Business Administration: Internal record-keeping, service improvement, and legal compliance

## 5. Lawful Basis for Processing

Under UK GDPR, we rely on the following lawful bases for processing personal data:

Consent: Where explicit permission is obtained (e.g., marketing communications)

Legitimate Interest: When processing is necessary for business operations (e.g., matching candidates to roles)

Contractual Obligation: When processing is required to fulfil a service agreement

Legal Obligation: For compliance with statutory and regulatory requirements

## 6. Data Sharing & Third Parties

We may share personal data with the following, only where necessary:

Clients and Employers: To facilitate job

applications and placements

Service Providers: Including payroll providers, background screening firms, and IT support

Legal and Regulatory Bodies: Where required by law

We do not sell personal data to third parties.

## 7. Data Retention

We retain personal data only as long as necessary for recruitment purposes, legal obligations, or business requirements.

Candidate data: Up to 2 years from last engagement (unless extended by consent)

Client and employer data: Retained as per contractual agreements

Financial records: Retained for 6 years as required by HMRC

Upon expiry, data is securely deleted or anonymized.

## 8. Data Security Measures

We implement strict security measures to protect personal data, including:

Encryption & Secure Storage: Ensuring data is stored securely on protected systems

Access Control: Restricting access to authorized personnel only

Regular Audits: Reviewing security policies and compliance regularly

Incident Response: Procedures in place to address potential data breaches

## 9. Your Rights Under GDPR

As an individual, you have the following rights under UK GDPR:

- Right to Access: Request a copy of your personal data
- Right to Rectification: Correct inaccurate or incomplete data
- Right to Erasure: Request deletion of your data (where applicable)
- Right to Restrict Processing: Limit the use

of your personal data

- Right to Data Portability: Request transfer of your data to another organization
- Right to Object: Object to data processing for specific purposes
- Right to Withdraw Consent: Where consent is the lawful basis

To exercise your rights, contact our DPO at [robert@tutela-group.co.uk](mailto:robert@tutela-group.co.uk).

## 10. Data Breach Reporting

In the event of a data breach, we will:

1. Assess and mitigate the impact
2. Notify affected individuals (if necessary)
3. Report serious breaches to the <sup>\*\*</sup>Information Commissioner's Office (ICO) within 72 hours

## 11. Updates to This Policy

We may update this GDPR policy periodically. The latest version will always be available on our website. Continued use of our services indicates acceptance of any updates.

## 12. Contact Us

For any data protection queries, please contact:

Soteria People Ltd

Email: [info@soteriapeople.co.uk](mailto:info@soteriapeople.co.uk)

Phone: 01925 973319

Website: [www.soteriapeople.co.uk](http://www.soteriapeople.co.uk)



# ***Leading the way in residential childcare recruitment***

## **Contact Info:**



20 Wenlock Road,  
London, N1 7GU



[info@soteriapeople.co.uk](mailto:info@soteriapeople.co.uk)  
[www.soteriapeople.co.uk](http://www.soteriapeople.co.uk)



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