

Privacy Statement

WELCOME TO CORE-ASSET CONSULTING

Privacy statement

At Core-Asset, we are committed to protecting and respecting your privacy.

This policy explains when and why we collect personal information about people who engage with our services, how we use it, the conditions under which we may disclose it to others, and how we keep it secure.

We may change this policy from time to time, so please check this policy occasionally to ensure that you are happy with any changes.

By engaging with us (either by applying for a job we are advertising, registering through our website, or getting in touch with our business) you are agreeing to be bound by this policy.

Any questions regarding this Policy and our privacy practices should be sent by email to our Data Protection Officer, Julie Fraser – Julie@core-asset.co.uk – or by writing to Julie Fraser, WeWork c/o Julie Fraser, 80 George Street, Edinburgh, EH2 3BU.

Who are we?

We are Core-Asset Consulting, a recruitment business dedicated to finding people jobs in the financial services, accounting & legal sectors within Scotland.

Core-Asset Consulting is a Limited Company (no. SC282072). The registered address is Core-Asset Consulting, 80 George Street, 3rd Floor, Edinburgh, EH2 3BU.

How do we collect information from you?

We obtain information about you when you engage with us. For example:

- When you apply for a job we are advertising either on our own website or on our partners' job-board websites
- When you register on our website or enquire about our services
- When you meet with us in person and complete our registration forms
- When you secure a role, and we may have to collect extra information from you in order to perform background checks using our electronic vetting forms
- When you kindly complete our surveys, as from time to time we may ask you how we can improve our services

What type of information do we collect from you?

The personal information we collect from you commonly includes the type of information that is likely to be listed on your CV, for example, your name, address, contact information, educational and work history.

We are likely to ask you for additional details to help you find a job and help us comply with our regulatory undertakings. For example, the type of job you are looking for, your previous salary, your nationality, and your ability to work in the UK (for which you will be asked to provide documentary evidence).

We may also ask you to provide us with additional sensitive data, such as your age, ethnicity, religious beliefs, gender, sexual orientation, and any disabilities.

The reason we ask for this sort of data is to assist us in monitoring our diversity and inclusion statistics. This information is not used in any other way. Also, it is entirely optional if you wish to share this information with us and by doing so help us promote diversity and inclusion across our services.

If we are engaging with you to perform pre-employment background checks, it is likely we will need to ask you for additional personal information to carry out this service.

This is likely to include your financial history, criminal history, referee details, etc. Your additional consent will be sought at this point.

If we are engaging with you because we are acting as your interim employer (for example, you may be temping or contracting via our business) it is likely we will ask for additional information to provide these services and ensure we are acting as a responsible employer.

This will be information such as your bank details (so we can pay you), your next of kin's contact details (in the event of an emergency) and any reasonable adjustments you may require from your workplace (for example, as a result of a disability).

If you have engaged with us via our website, it is likely we will have retained additional information that is not listed above (such as your IP address and browsing habits). Please see section 'use of cookies' for more information.

How is your information used?

We may use your information to:

- help you find a job by notifying you of new vacancies
- share with our clients to help you find a job (although your specific consent will be obtained on a case-by-case basis)
- send you communications in relation to your job search and our recruitment services
- send you communications in relation to hiring new talent (our clients only)
- carry out our obligations arising from any contracts entered into by you and us

- seek your views or comments on the services we provide
- notify you of changes to our services to you
- perform pre-employment background checks (additional consent will be sought)
- act as your interim employer if applicable (additional consent will be sought)

Due to the long-term nature of job searching and the relationship with our clients, **our retention period for personal information is five years**. This period begins from the last time we have had contact from you. In some cases, we are legally required to hold some types of information to fulfil our statutory obligations, although it is unlikely this will exceed five years.

Who has access to your information?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Our clients

To find you a job, it perhaps comes as no surprise that we need to share your details with our clients, who may ultimately go on to be your future employer. This may involve uploading your data onto our clients' websites, recruitment systems or sharing via email.

In all cases your consent is obtained and recorded on a specific case-by-case basis. Our clients may choose to contact you directly following this, to request additional information and share their own privacy policy with you.

Third-party product providers

We work closely with various third-party product providers to bring you a range of high-quality and reliable services designed to meet your needs.

Core-Asset's third-party providers are exclusively software providers that provide us with software solutions allowing us to perform our services.

They provide applications such as our email system, database, electronic forms, website, and finance systems. These third parties will not control your data, nor will they have unsolicited access to it.

They do, however, assist us in providing the online security protections that keep your data safe and secure. Core-Asset performs regular risk assessments and monitoring of the effectiveness of the online protections our third parties provide.

We may transfer your personal information to a third party:

- as part of a sale of some or all our business and assets to any third party
- as part of any business restructuring or reorganisation

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation
- to enforce or apply our terms of use
- to protect the rights, property or safety of our supporters and customers.

However, we will take steps to ensure your privacy rights continue to be protected.

In the event we are performing pre-employment background checks, it is likely we will be sharing your data with additional third-party providers such as credit agencies, criminal record agencies, your previous employers, and educational establishments.

In these cases, your additional consent will be obtained, and a specific privacy statement provided.

Your choices

You have a choice whether you wish to receive information from us and continue to use our services. If you do not want to receive communications from us about our recruitment services, you can request at any time to be removed from our systems and exercise 'the right to be forgotten'.

Similarly, you have the right to request details of data we currently hold by making what is known as a 'subject access request', to which we will respond to within 30 days.

Any request can be made by emailing our DPO, Julie Fraser at Julie@core-asset.co.uk or by writing to us at WeWork c/o Julie Fraser, Core-Asset Consulting, 80 George Street, Edinburgh, EH2 3BU. Please ensure you mark your correspondence 'Right to be Forgotten' or 'Subject Access Request'.

We do not intend to contact you for direct marketing purposes by email, phone, or text message. We will only contact you for the purposes identified in the 'How is your information used?' section above.

How you can update your information

The accuracy of your information is important to us. We are working on ways to make it easier for you to review and correct the information that we hold about you.

In the meantime, if any of your information changes, or any of the information we hold is inaccurate or out of date, please email us at recruitment@core-asset.co.uk or write to Core-Asset Consulting at WeWork c/o Core-Asset Consulting, 80 George Street, Edinburgh, EH2 3BU. Alternatively, please contact your consultant at Core-Asset.

Processing of your personal data under the UK General Data Protection Regulations (UK GDPR)

As a recruitment business offering a wide range of services, we process personal data in relation to our staff, candidates, and client contacts. It is crucial that we abide by the principles of UK GDPR as set out below.

Our purposes for processing personal data

We process your data for the following purposes:

- For **our candidates**, to provide job finding services;
- For **our contractors**, to comply with all industry and employment regulations and meet all our obligations as an employer;
- For **our clients**, to assist with finding suitable candidates and meet our contractual obligations;
- For **our suppliers and partners**, to meet our respective contractual obligations.

Principles relating to the processing of personal data under UK GDPR

Lawfulness, fairness and transparency	Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject
Purpose limitation	Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
Data minimisation	Personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed
Accuracy	Personal data shall be accurate and, where necessary, kept up to date
Storage limitation	Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
Integrity and confidentiality	Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures
Accountability	The controller shall be responsible for, and be able to demonstrate compliance with the UK GDPR

For more information about how we abide to each principle, please request our Data & Information Security policy document by contacting our DPO, Julie Fraser at Julie@core-asset.co.uk.

Legal basis to process your data

We will process your data under the “Express Consent” legal basis – which means you have directly consented to us processing your data for the purposes of finding you a job or conducting employment background checks – by way of our consent forms, emails or on the phone.

If you have not provided express consent or your consent has not been recorded in our database but are going through our recruitment process (i.e. your CV has been sent to a client or you are going through the interview process),

we will process your data under the “legitimate interest” legal basis.

We may also process your data under the “legal obligation” basis for any data that we are required to keep under current legislation (i.e. PAYE information for our employees and contractors).

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it is treated securely.

Your details are most likely to be transmitted to us over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

Once we receive your information, we make our best effort to ensure its security on our systems – a more detailed description of our security controls can be found in our Data & Information Security policy document, which is available upon request by contacting our DPO, Julie Fraser at Julie@core-asset.co.uk.

Profiling and Automated Decisions

Profiling and automated decision-making tools do **not** form part of our services, except some elements of our pre-employment vetting services (such as a financial probity check). In the event we are required to use your data for such purposes, your specific consent will be obtained fully explaining the justification for doing so.

Note: Profiling is (a) the automated processing of personal data; and (b) using that personal data to evaluate certain personal aspects relating to a natural person. Specific examples include analysing or predicting “aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.”

Use of Artificial Intelligence (AI) tools

Nature and purpose of our AI tools

We do **not** use AI tools to source, screen or select candidates during our recruitment process. The data processed by our AI tools is **not** used to train other models.

We do use general purpose AI models (GPAI) and generative AI as part of some of our tools such as our VoiP call system (Devyce) and Copilot/Chat-GPT, however, their purpose is to improve our operational efficiency and approved uses are limited to generating meeting notes and call summaries, and assist with administrative tasks such as writing job adverts and formatting CVs.

UK White Paper: A pro-innovation approach to AI regulation

We abide by the 5 principles set out in the UK White Paper: A pro-innovation approach to AI regulation:

Safety, security and robustness	We follow cybersecurity and data privacy best practices, and we hold ISO 27001 and 22301 certifications.
Appropriate transparency and explainability	We provide information about the nature, purpose and outcome of our use of AI in our Privacy Statement (this document)
Fairness	We do not use AI in our recruitment process and therefore can guarantee equal treatment of all our candidates and commit to everyone being treated fairly and without bias or discrimination.
Accountability and governance	Our AI framework and policy are reviewed and assessed regularly, and any identified gap is discussed and actioned by Senior Management.
Contestability and redress	You can address any concern or issue to our DPO at julie@core-asset.co.uk .

Call Recordings

Please note that our calls are recorded for quality and training purposes and stored on our VoiP supplier's platform for 3 months.

You can ask for the recording to be stopped and/or deleted at any time.

Use of 'cookies'

Like many others, Core-Asset Consulting's website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit.

They collect statistical data about your browsing actions and patterns and do not identify you as an individual.

For example, we use cookies to store your browsing preferences. This helps us to improve our website and deliver a better and more personalised service.

It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit our full cookies policy. Turning cookies off may result in a loss of functionality when using our website.

Transferring your information outside of the UK

As part of our services, some of the information which you provide to us, on occasions, may be transferred to countries outside the United-Kingdom (UK).

For example, this may be when we need to perform a pre-employment background check if you have lived and worked overseas, and we need to verify this. If so, your specific consent will be obtained prior to us doing so.

When selecting software suppliers, we ensure we work with vendors who operate servers within the UK, as it gives us certain assurances your data will be protected by the same data protection laws.

However, there could be rare occasions when we need to engage with software providers who, from time to time, are in a country outside of the UK, including the European Union (EU). These countries may not have similar data protection laws to the UK. By submitting your personal data, you are agreeing to this transfer, storage, or processing.

If we transfer your information outside of the UK in this way, we will take steps to ensure that appropriate security measures are taken, with the aim of ensuring your privacy rights continue to be protected as outlined in this policy. These measures range from checking the adequacy decisions in place with third countries, to requiring International Data Transfer Agreements from our clients and suppliers.

If you use our services while you are outside the UK, your information may be transferred outside the UK to provide you with those services.

Making a complaint

In the event you wish to make a complaint about anything regarding the processing and retention of your data, please in the first instance contact our Data Protection Officer, Julie Fraser (Julie@core-asset.co.uk).

If you are unhappy with the response from Core-Asset's DPO, or if you need any advice, you should contact the Information Commissioner's Office (ICO) on the number below:

ICO helpline: 0303 123 1113

Review of this policy

We keep this policy under regular review. This Policy was last updated in **September 2025**.

People, the core asset of every business

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