

Privacy Notice

How Orka Financial Limited uses personal information

Data controller	Orka Financial Limited
Company number	09196064
Registered office	450 Brook Drive, Green Park, Reading, Berkshire, RG2 6UU
Data protection contact	privacy@orkafinancial.com
Website	orkafinancial.com
Effective date	20 October 2026
Version	1.1

Summary. Orka Financial is a recruitment business. We use personal information to provide work-finding and recruitment services, operate our business, meet legal obligations and protect our systems. We may use carefully controlled AI-assisted tools for administrative support, but people remain responsible for recruitment decisions.

Contents

- | | |
|---|---------------------------------------|
| 1. Who we are and the scope of this notice | 8. Who we share information with |
| 2. Information we collect | 9. International transfers |
| 3. Where information comes from | 10. Retention |
| 4. How and why we use information | 11. Your rights |
| 5. Lawful bases | 12. Marketing and job communications |
| 6. Special category and criminal-offence data | 13. Website technologies and cookies |
| 7. AI-assisted processing and human oversight | 14. Security |
| | 15. Changes, questions and complaints |

1. Who we are and the scope of this notice

Orka Financial Limited (“Orka Financial”, “we”, “us” or “our”) provides permanent and temporary recruitment and work-finding services. For the personal information described in this notice, we generally act as the data controller and decide why and how it is used.

This notice applies to candidates and work-seekers, temporary workers, referees, client contacts, prospects, website users and other people whose information we process in connection with our recruitment and

business activities. It applies whether information is provided directly to us, collected from a third party or generated through our dealings with you.

We process personal information in accordance with the UK GDPR, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 and other applicable UK data-protection laws, as amended from time to time.

2. Information we collect

Candidates, work-seekers and temporary workers

Depending on the service and role, we may collect:

- name, title, contact details, address and communication preferences;
- CV, employment history, skills, qualifications, professional memberships, salary or rate information, benefits, notice period and work preferences;
- interview, assessment, call and correspondence notes;
- identity and right-to-work information, including copies of relevant documents and the outcome of checks;
- National Insurance, payroll, tax, pension, bank and payment information where needed for temporary work;
- referee details and references;
- information about availability, attendance, assignments, timesheets, holiday, sickness and working-time choices;
- information needed to comply with legal, regulatory, safeguarding or client requirements;
- records of how you use our website, forms and communications, including technical data such as IP address, browser, device, timestamps and security logs; and
- information generated through our recruitment relationship, including candidate-record identifiers, audit trails and status information.

Client, supplier, prospect and referee contacts

We may collect identity and business contact details, job title, organisation, correspondence, vacancy or service requirements, contractual and payment information, professional history and information relevant to a reference or business relationship.

3. Where information comes from

We may receive personal information:

- directly from you through our website, registration forms, email, telephone, video calls, interviews, CVs, applications and other correspondence;
- from job boards and CV databases, including services such as Reed, Indeed, Totaljobs and CV-Library;
- from professional networking platforms such as LinkedIn;
- from clients, former employers, referees, other agencies, master vendors, umbrella companies and payroll providers;
- from publicly available sources such as Companies House, professional registers and company websites;
- from identity, right-to-work, background or suitability-check providers where relevant and lawful;
- from our recruitment, email, website, applicant-tracking, CRM and business systems; and
- from information created during our relationship with you.

When we obtain your information from another source, we will provide the information required by law within the applicable period, unless an exemption applies.

4. How and why we use information

We may use personal information to:

- provide recruitment and work-finding services and manage our relationship with you;
- understand your experience, preferences, availability and suitability for roles;
- search for opportunities, contact you about roles and introduce or supply you to clients where appropriate;
- arrange interviews, registration calls, references, checks, offers, placements and assignments;
- administer temporary work, payroll, pensions, holiday, working time and payments;
- maintain accurate candidate, client and business records;
- respond to queries, exercise requests and complaints;
- manage clients, suppliers, contracts, invoices, insurance, audits and professional advice;
- meet employment-agency, immigration, tax, safeguarding, fraud-prevention and other legal or regulatory requirements;
- protect people, confidential information, systems and services from misuse, fraud and security threats;
- improve our recruitment, website, communications and operational processes;
- establish, exercise or defend legal claims; and
- send relevant service communications, job information and, where permitted, marketing.

5. Lawful bases

We use one or more lawful bases depending on the activity:

- **Contract and steps before a contract:** where processing is needed to provide requested recruitment services, consider a placement, manage an assignment or perform an agreement.
- **Legal obligation:** where we must comply with recruitment, right-to-work, tax, payroll, pensions, working-time, equality, regulatory or other legal duties.
- **Legitimate interests:** where necessary to operate a responsible recruitment business, provide work-finding services, maintain accurate records, communicate about suitable opportunities, develop client relationships, prevent fraud, secure our systems and improve services, provided those interests are not overridden by your rights.
- **Consent:** where the law requires consent or where we choose consent as the appropriate basis. You may withdraw consent at any time, although this does not affect earlier processing or processing supported by another lawful basis.
- **Legal claims and vital interests:** in the limited circumstances where these bases apply.

If information is required by law or contract and you do not provide it, we may be unable to provide some recruitment services, put you forward for a role, engage you for temporary work or make a payment.

6. Special category and criminal-offence data

Some information requires additional protection. Where relevant and lawful, we may process special category information such as health or disability information needed for reasonable adjustments, occupational requirements or employment and social-protection obligations. We may also process equality-monitoring information where appropriate.

We only process special category information where both an ordinary lawful basis and an additional condition under Article 9 UK GDPR and the Data Protection Act 2018 apply. Depending on the circumstances, this may include employment and social-protection law, substantial public interest, legal claims or explicit consent.

Criminal-offence information is regulated separately from special category data. We only request or use it where relevant to a role, required or permitted by law, and supported by an applicable condition under Article 10 UK GDPR and the Data Protection Act 2018. We apply access restrictions and any additional safeguards or policy documentation required by law.

7. AI-assisted processing and human oversight

We may use approved artificial-intelligence and automation tools to support administrative and operational tasks. These may include extracting structured information from forms or correspondence, matching information against an existing record, categorising documents, identifying missing information, producing summaries, drafting internal or external communications, routing work and supporting searches.

We use these tools to assist our staff, not to replace their professional judgment. Orka Financial does not use solely automated processing to make final decisions about a person's suitability, rejection, shortlisting, placement or employment where the decision would produce legal or similarly significant effects. Consultants and authorised staff remain responsible for material recruitment decisions and can review or correct AI-assisted outputs.

We aim to minimise the personal information supplied to such tools, restrict access, keep audit records where appropriate and use approved providers under contractual and security controls. AI and automation providers may act as processors on our behalf. Information about relevant provider categories, international safeguards and your rights is set out elsewhere in this notice and can be requested from privacy@orkafinancial.com.

8. Who we share information with

Where necessary and lawful, recipients may include:

- clients and prospective clients to whom we may introduce or supply you;
- former employers and referees, subject to any stated contact restrictions;
- payroll, pension, payment and umbrella-company providers;
- master vendors, neutral vendors and other recruitment agencies in a supply chain;
- identity, right-to-work, background, qualification and suitability-check providers;
- our professional advisers, insurers, auditors and trade bodies, including the Recruitment and Employment Confederation;
- our website, forms, email, communications, CRM, applicant-tracking, cloud-storage, security, AI and automation service providers;
- HMRC, the Home Office, the Employment Agency Standards Inspectorate, courts, regulators, law-enforcement bodies and other public authorities where required or permitted by law; and
- prospective purchasers, investors and advisers in connection with a genuine business sale, restructuring or transfer.

We do not sell candidate personal information. We require service providers to use information only for authorised purposes and to protect it appropriately.

9. International transfers

Some providers or recipients may process information outside the United Kingdom. Where a transfer is not covered by UK adequacy regulations, we use an approved safeguard where required, such as the UK International Data Transfer Agreement, the UK Addendum to approved Standard Contractual Clauses, or another lawful transfer mechanism. We also consider supplementary technical and organisational measures where appropriate.

You may contact us for further information about the safeguards relevant to your information.

10. Retention

We keep personal information only for as long as reasonably necessary for the purposes described in this notice, including to provide recruitment services, maintain accurate records, meet legal and regulatory duties, resolve disputes and establish or defend legal claims.

Retention periods vary according to the type of record and our relationship with you. When setting a period, we consider the purpose, amount, nature and sensitivity of the information, the risk of harm, whether the purpose can be achieved another way, limitation periods and applicable legal requirements.

Examples of statutory or operational considerations include:

- work-seeker records required under the Conduct of Employment Agencies and Employment Businesses Regulations 2003;
- right-to-work records, generally retained for the duration of the relevant engagement and for two years afterwards;
- working-time and opt-out records, retained for the legally required period;
- payroll, tax, pensions, holiday-pay and minimum-wage records, which may need to be retained for several years; and
- records needed for legal claims, compliance evidence, fraud prevention or security.

We periodically review records and delete, securely dispose of or anonymise information when it is no longer required. You may ask us about the period or criteria applying to a particular record.

11. Your rights

Depending on the circumstances, you may have the right to:

- be informed about how your information is used;
- access your personal information;
- correct inaccurate or incomplete information;
- request deletion in certain circumstances;
- restrict processing in certain circumstances;
- receive or transfer certain information in a portable format;
- object to processing based on legitimate interests and object at any time to direct marketing;
- withdraw consent where processing relies on consent; and
- request human intervention, express your view and challenge a decision where the legal rights relating to solely automated decision-making apply.

These rights are not absolute and exemptions may apply. To exercise a right, email privacy@orkafinancial.com. We may need information to confirm your identity and locate the relevant records.

12. Marketing and job communications

We may contact candidates about potentially suitable roles as part of our work-finding service where supported by contract steps, legitimate interests or consent, depending on the circumstances. We may send broader marketing or industry information where you have consented or where another lawful rule permits it.

You can unsubscribe from marketing at any time using the link in the message or by contacting us. Opting out of marketing does not prevent necessary service communications about an application, placement,

assignment, payment, compliance matter or an active recruitment relationship.

13. Website technologies and cookies

Our website and forms use technologies needed to operate, secure and improve the service. These may collect technical information such as IP address, device and browser details, page activity, form-security signals and timestamps. At the effective date of this notice, the registration experience includes Google reCAPTCHA for spam and abuse prevention and may load Google-hosted fonts. Google may receive technical information when those services load.

We may also use WordPress and associated functional or security tools, including local website analytics or popup functionality. Non-essential cookies or similar technologies should only be used with consent where required by law.

Because website technologies can change more frequently than this notice, the current cookie banner or Cookie Notice should provide the detailed cookie inventory, purposes, providers and durations. Browser settings can also control cookies, although blocking necessary technologies may prevent parts of the site from working.

14. Security

We use appropriate technical and organisational measures designed to protect personal information. Depending on the system and risk, these may include access controls, multi-factor authentication, secure transmission, encryption, logging, backups, staff controls, supplier due diligence, updates, monitoring and periodic reviews.

Access is limited to people and providers who need the information for authorised purposes. No internet or email transmission is completely secure, so we cannot guarantee absolute security. If a personal-data breach occurs, we will assess it and notify affected people and the Information Commissioner's Office where required by law.

15. Changes, questions and complaints

We may update this notice to reflect changes in law, technology, providers or our services. We will publish the current version with its effective date and, where appropriate, draw material changes to your attention.

Questions, requests or complaints should first be sent to our Data Protection Lead at privacy@orkafinancial.com or by post to Orka Financial Limited, 450 Brook Drive, Green Park, Reading, Berkshire, RG2 6UU.

You also have the right to complain to the Information Commissioner's Office. Visit ico.org.uk/make-a-complaint or telephone 0303 123 1113. If your information is processed in another country, you may also have the right to contact the relevant local supervisory authority.