HFG Data Retention Policy version 1 1803



Scope

This policy applies to all personal data held by HFG and should be read in conjunction with the HFG Privacy Policy.

How long do we hold personal data for?

We will delete your personal data from our systems if we have not had any meaningful contact with you (or, where appropriate, the company you are working for or with) for three years (or for a longer period as we believe in good faith that the law or relevant regulators require us to preserve your data). After this period, it is likely your data will no longer be relevant for the purposes for which it was collected.

Third Party or other entities

For those candidates whose services are provided via a third party company or other entity, "meaningful contact" with you means meaningful contact with the company or entity, which supplies your services. Where we are notified by such company or entity that it no longer has that relationship with you, we will retain your data for no longer than three years from that point or, if later, for the period of two years from the point we subsequently have meaningful contact directly with you.

Meaningful Contact

When we refer to "meaningful contact", we mean, for example, communication between us (either verbal or written), or where you are actively engaging with our services. If you are a candidate, we will consider there to be meaningful contact with you if you submit your updated CV to our website, any consultants or an online advert. We will also consider it meaningful contact if you communicate with us about potential roles, either by verbal or written communication or click through from any of our marketing communications. Your receipt, opening or reading of an email or other digital message from us will not count as meaningful contact – this will only occur in cases where you click-through or reply directly.