

Candidate Information Handling, Storage and Disposal Policy

Title of Policy Document	Candidate Information Handling, Storage and Disposal
Issue Date and Version	January 2026 (Version 1)
Author / Department	Compliance Manager
Signed off by	 Director
Next review date	January 2027
Distribution	All services
First issue date	January 2026

1. Purpose

Candidates trust us with their working lives on paper. This policy explains, in practical terms, how Cucumber Partners collects, holds and eventually destroys candidate information. It applies our Data Protection and Information Governance Policy to the specific realities of recruitment files.

2. How we collect your information

Directly from you, when you apply through our website, send us a CV, or speak to us; from referees you nominate; from vetting providers, DBS/AccessNI and right-to-work checks, where the role requires; and from publicly available professional sources such as your listed qualifications, where relevant to a placement.

3. What we hold

A typical candidate file contains: identity and contact details; CV, work history and qualifications; right-to-work evidence; a minimum of two references covering the last five years, verified with the referee; vetting outcomes appropriate to the role; interview and registration notes; and, for temporary workers, the details needed to pay you. We collect nothing we do not need for finding you work and meeting our legal duties.

4. How we use and share it

Your information is used to register you, match you to roles, present you to clients with your knowledge, and meet our obligations under the Conduct of Employment Agencies and Employment Businesses Regulations 2003. It is shared with prospective employers only as a

placement progresses, and with payroll and HMRC for paid work. Nothing is shared for marketing by third parties, and nothing is sold, ever.

5. How it is stored

Candidate records are held in access-controlled systems available only to staff who need them. Paper documents are scanned into the file and the originals returned or destroyed; anything retained on paper lives in locked storage. Devices are encrypted and protected by strong authentication. Vetting documents, including anything relating to criminal records, are held separately with tighter access, in line with our DBS handling policy.

6. How long we keep it

We keep candidate records for as long as we are actively working with you, and afterwards for the periods required by recruitment and tax law, employment business records must generally be kept for at least one year after their creation or after we last provided you services, and payroll records longer under tax legislation. Where you ask us to close your file and no legal duty requires retention, we delete it. Criminal records information is never retained beyond the timescales in the DBS Code of Practice.

7. Disposal

When retention ends, digital records are erased from live systems and backups on their normal cycle, and paper is cross-cut shredded. Disposal is routine and logged, deletion should never depend on someone remembering.

8. Your rights and our review

You can see your file, correct it, or ask us to delete it at any time, contact Mathew Vandermotten on 0161 524 1715 or info@cucumber-operations.co.uk. This policy is reviewed annually alongside our data protection policy.