

# Tornado Talent Privacy and GDPR Policy

**Effective Date: 05/01/2026**

**Last Updated: 05/01/2026**

## 1. Introduction

Tornado Talent is committed to protecting the privacy and security of personal data. This GDPR Statement explains how we collect, process, and safeguard personal data in accordance with the **General Data Protection Regulation (EU) 2016/679 (GDPR)** and relevant UK data protection laws.

As an executive search and recruitment firm, we handle personal data to provide recruitment services to both candidates and clients. We take our obligations seriously and ensure that all data is processed lawfully, fairly, and transparently.

## Data Protection Registration.

Tornado Talent Limited is registered with the Information Commissioner's Office (ICO) under registration number: ZC074854

For more information about your rights regarding personal data, please visit: <https://ico.org.uk>

## 2. Data Controller Information

- **Company Name:** Tornado Talent
- **Registered Address:** 20 Wenlock Road, London, N1 7GU
- **Contact Email:** [info@tornadotalent.com](mailto:info@tornadotalent.com)
- **Phone Number:** 0203 105 2773

## 3. What Personal Data We Collect

We may collect and process the following types of personal data:

- **Candidate Data:** Name, contact details, CV/resume, employment history, qualifications, references, salary expectations, and any other information relevant to a job search.

- **Client Data:** Contact names, company details, job descriptions, and other business-related information.
- **Supplier Data:** Contact details, payment information, and correspondence.
- **Website Usage Data:** IP address, cookies, and analytics to improve our services.

#### 4. How We Collect Data

We collect personal data through various means, including:

- Directly from candidates and clients via email, phone, or application forms.
- From third-party sources, including professional networking platforms (e.g., LinkedIn), job boards, and referrals.
- Automatically when you visit our website through cookies and similar technologies.

#### 5. Purpose of Data Processing

We process personal data for the following purposes:

- To provide recruitment and executive search services.
- To evaluate candidate suitability for roles.
- To communicate with clients and candidates during the recruitment process.
- To comply with legal and regulatory obligations.
- To improve our services and website experience.

#### 6. Legal Basis for Processing

We rely on the following legal bases for processing personal data:

- **Consent:** When individuals voluntarily submit their information for job applications.
- **Contractual Necessity:** When processing is required to fulfil a contract with candidates or clients.
- **Legitimate Interests:** To provide our services and manage relationships with candidates, clients, and suppliers.
- **Legal Obligations:** To comply with applicable laws and regulations.

#### 7. Data Sharing and Transfers

We may share personal data with:

- Clients who are considering candidates for positions.
- Third-party service providers who assist with our operations (e.g., IT services, database management).
- Regulatory authorities if required by law.

#### International Transfers:

If personal data is transferred outside the European Economic Area (EEA), we ensure

appropriate safeguards are in place to protect the data, such as standard contractual clauses or reliance on adequacy decisions.

## 8. Data Retention Policy

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including to satisfy legal, regulatory, and contractual obligations.

- **Candidate Data:** Retained for up to **2 years** after the last contact unless consent is renewed.
- **Client and Supplier Data:** Retained for **6 years** following the termination of services.

## 9. Your Rights Under GDPR

Under GDPR, individuals have the following rights:

**Right to Access:** Request a copy of the personal data we hold.

**Right to Rectification:** Correct any inaccuracies in your personal data.

**Right to Erasure:** Request the deletion of personal data where appropriate.

**Right to Restrict Processing:** Limit the processing of personal data.

**Right to Data Portability:** Request to transfer personal data to another organization.

**Right to Object:** Object to the processing of personal data for specific purposes.

To exercise your rights, please contact us at [info@tornadotalent.com](mailto:info@tornadotalent.com)