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**RAEORA**  
Recruitment  
and Employer of  
Record Alliance

# **RAEORA**, Recruitment and Employer of Record Alliance **Data Protection and Privacy Policy**

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**Recruitment and Employer of Record Alliance (RAEORA) Limited**  
Company Number 15776754 | Directors: AK Pike (CEO); JJ Durandt (Managing)

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**Recruitment and Employer of Record Alliance (RAEORA) (Pty) Ltd**  
Company Registration 2025/479857/07 | Directors: AK Pike (CEO); JJ Durandt (Managing)

# DATA PROTECTION & PRIVACY POLICY

Effective Date: Nov 2025 | Last updated: Nov 2025

The purpose of this Data Protection and Privacy Policy is to outline the principles, responsibilities, and procedures that guide the protection of personal and sensitive data processed by **Recruitment and Employer of Record Alliance (RAEORA) Limited (UK Company No. 15776754)** and **Recruitment and Employer of Record Alliance (RAEORA) (Pty) Ltd (South Africa Company Reg. 2025/479857/07)**, (together referred to as “the Company”).

The Company is committed to safeguarding the privacy, confidentiality, and integrity of personal data in compliance with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018 (UK)**, and the **Protection of Personal Information Act 4 of 2013 (POPIA)** of South Africa.

This Policy ensures that data subjects – including clients, candidates, employees, and business partners – understand how their information is collected, used, stored, and protected.

## 1. SCOPE

This Policy applies to:

- All employees, contractors, vendors, and authorised users of **Recruitment and Employer of Record Alliance (RAEORA) Limited (15776754)** and **Recruitment and Employer of Record Alliance (RAEORA) (Pty) Ltd (2025/479857/07)**; and
- All personal data collected from clients, candidates, website users, employees, suppliers, and other third parties.

The Policy covers all personal data processed in both jurisdictions, whether collected online via our websites (.com, .co.uk, .co.za) or offline through business activities.

## 2. POLICY STATEMENTS

### 2.1 Data Protection Principles

The Company adheres to the following principles of lawful data processing:

- **Lawfulness, Fairness and Transparency:** Data will be collected and processed lawfully, fairly, and transparently, with clear communication of the purpose for which it is used.
- **Purpose Limitation:** Data will only be used for specified, legitimate business purposes such as recruitment, client service, HR consulting, and legal compliance.
- **Data Minimisation:** Only the minimum necessary information will be collected and retained.
- **Accuracy:** Reasonable steps will be taken to ensure data is accurate, complete, and up to date.
- **Storage Limitation:** Data will be retained only for as long as necessary for the purposes collected.
- **Integrity and Confidentiality:** Appropriate technical and organisational measures will protect personal data against unauthorised access, loss, or damage.

### 2.2 Data Collection and Consent

- **Consent:** Where required by law, the Company will obtain clear and informed consent before collecting or processing personal data.

- **Legitimate Interests:** In some cases, processing may be based on legitimate business interests, such as fulfilling recruitment services or maintaining client relationships.
- **Children’s Data:** The Company does not knowingly collect data from minors. Where processing is necessary, parental or guardian consent will be obtained.

### 2.3 Data Subject Rights

In line with UK GDPR and POPIA, data subjects have the right to:

- Access their personal data and request a copy;
- Request correction or updating of inaccurate information;
- Request deletion or restriction of processing where applicable;
- Object to the processing of their personal data;
- Withdraw consent at any time, without affecting the lawfulness of prior processing;
- Request data portability (UK and EU jurisdictions).

Requests may be submitted to the Company’s Data Protection Officer or designated privacy contact.

### 2.4 Data Retention

The Company retains personal data only for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, contractual, or regulatory obligations.

Typical retention periods are as follows:

- **Candidate Data (CVs, profiles, and related records):** Up to 24 months after the last interaction, unless the individual consents to continued retention for future opportunities.
- **Client and Supplier Data:** Up to 6 years after the end of the business relationship (for audit and legal purposes).
- **Employee Records:** As required by employment and tax laws.
- **Marketing and Communication Data:** Until the individual withdraws consent or unsubscribes.
- **Website and Cookie Data:** As specified in the Company’s Cookie Policy.

Data no longer required is securely deleted or anonymised.

# DATA PROTECTION & PRIVACY POLICY

## 2.5 Data Breach Response

- **Notification:** The Company will promptly assess and report any data breach to the relevant supervisory authority (the UK Information Commissioner's Office or the Information Regulator of South Africa) and affected individuals, as legally required.
- **Mitigation:** Steps will be taken to contain, investigate, and mitigate the impact of any breach.

## 2.6 Third-Party Processors

Where the Company engages third-party service providers (such as IT support, cloud storage, or recruitment platforms), appropriate data processing agreements will be in place to ensure compliance with applicable data protection laws and to safeguard personal information.

## 2.7 Training and Awareness

All employees, contractors, and authorised users will receive regular training and updates on data protection, cybersecurity, and privacy compliance to ensure ongoing adherence to this Policy.

## 3. RESPONSIBILITIES

- **Data Protection Officer / Appointed Compliance Contact:** Oversees data protection compliance, manages subject access requests, maintains data records, and liaises with regulatory authorities.
- **Employees and Users:** Must handle personal data responsibly and report any suspected data breach or non-compliance immediately.

## 4. COMPLIANCE AND CONSEQUENCES

Failure to comply with this Policy may result in disciplinary action under Company procedures and may lead to civil, criminal, or regulatory penalties under applicable data protection laws.

## 5. POLICY REVIEW

This Policy will be reviewed at least annually or as required by changes in legislation, business practices, or regulatory guidance. Updates will be communicated to all relevant personnel and published on the Company's websites.

## 6. CONTACT US

If you have any questions, requests, or complaints regarding this Privacy Policy or our data protection practices, please contact us:

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### SOUTH AFRICA

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