Brilliantin Recruitment Privacy Notice

Oct 8, 2026 · @Nicholas Eaton

Who we are

Brilliantin Recruitment is the controller of the personal data described in this notice. We are specialist headhunters placing senior and mid level professionals across the UK, Europe and the US, mainly in global payroll, EOR, HR Tech, SaaS, fintech, energy infrastructure, iGaming, e wallets and legal services.

Detail	
Legal entity	Brilliantin Recruitment Ltd
Company number	12710048 (registered in England and Wales)
Registered office	Kings Court Business Centre, London Road, Stevenage, Hertfordshire, SG1 2NG
ICO registration number	00013932303
Privacy contact	Nicholas Eaton, Founder and CEO
Email	nicholas@brilliantin.co.uk
Phone	07921 917 088

We are not required to appoint a Data Protection Officer. Send any privacy question or request to the contact above.

Who this notice covers

This notice explains how we handle personal data about:

- **Candidates**: people who apply to us, people we approach about roles, and people we may approach in future, including passive candidates we identify through headhunting.
- **Client contacts**: hiring managers, founders, investors and HR teams at companies we work with or would like to work with.
- **Referees**: people a candidate names to provide a reference.
- **Suppliers and partners**: contacts at businesses that provide services to us, such as our onboarding partner.
- **Website visitors**: people who use our website or contact us through it.

We process personal data under the UK GDPR and the Data Protection Act 2018. Where we deal with people in the EU, we also apply the EU GDPR.

Personal data we collect

Who	Data we may hold
Candidates	Name, contact details, location, CV, career history, qualifications, skills, current and expected salary and benefits, notice period, role preferences, interview notes and assessments, references, right to work documents, and records of our calls, emails and messages with you
Client contacts	Name, job title, employer, business contact details, details of the roles you are hiring for, and records of our communications
Referees	Name, job title, contact details, and the reference you give
Suppliers and partners	Name, job title, business contact details, and payment details for the business
Website visitors	Information you submit through forms, and technical data such as IP address and browser type

We may record video and phone calls, with your knowledge, so we can produce accurate notes. We will tell you at the start of a call if it is being recorded, and you can ask us not to record.

Where we get your data

Most data comes from you directly: when you send a CV, speak to us, apply for a role or contact us.

We also collect data from other sources:

- Professional networking sites, mainly LinkedIn, and other public professional profiles
- Company websites, press coverage and public business registers such as Companies House
- Job boards where you have posted your CV
- Recommendations and referrals from people in our network

- Clients, who share feedback on interviews and assessments
- Referees you nominate

If we collect your data from somewhere other than you, we will send you a link to this notice within one month, or at our first contact with you if sooner.

How we use your data and our lawful bases

We rely mainly on legitimate interests: running a recruitment business that connects talented people with the right employers. We have weighed these interests against your rights and believe you would reasonably expect a specialist headhunter to process your data this way.

Purpose	Lawful basis
Identifying and approaching candidates for roles	Legitimate interests
Assessing your suitability and introducing you to clients	Legitimate interests; contract steps where you have asked us to represent you
Arranging interviews, offers and onboarding	Legitimate interests; steps towards a contract
Carrying out reference and right to work checks	Legal obligation; legitimate interests
Managing client relationships and winning new business	Legitimate interests
Sending relevant job alerts and market updates	Legitimate interests for existing contacts; consent where the law requires it
Invoicing, accounting and record keeping	Contract; legal obligation
Handling complaints and legal claims	Legitimate interests; legal obligation

We do not make decisions about you based solely on automated processing, including profiling, that have legal or similarly significant effects. A person always reviews candidate decisions.

Special category and criminal records data

We do not ask for special category data unless a role needs it. Special category data covers health, ethnicity, religion, sexual orientation, political views, trade union membership, genetics and biometrics.

We may process it in limited cases:

- **Health or disability**: to arrange reasonable adjustments for interviews, under employment law obligations.
- **Equal opportunities monitoring**: only if you choose to provide it, under substantial public interest conditions in the Data Protection Act 2018. It is kept separate and used only in summary form.
- **Information you volunteer**: if you include it in your CV or tell us in conversation, we will only use it where needed for your application.

We only handle criminal records information where a client requires a check for a specific role, it is permitted by law, and we have told you in advance.

Who we share your data with

We never sell personal data. We will not send your CV to a client without first discussing the role with you.

We share data only where needed with:

- **Clients**: employers and their investors considering you for a role. Each client becomes a controller of the data it receives.
- **Our consultants**: self employed associate consultants who work on Brilliantin assignments under confidentiality terms.
- **Partners**: such as our onboarding and transitions partner, where you or your employer take up that service.
- **Service providers acting for us**: our recruitment CRM and outreach platform, Microsoft 365 email and file storage, LinkedIn Recruiter, call recording and note taking tools, IT support, and accountants. They act on our instructions under written contracts.
- **Referees and background check providers**: when a reference or check forms part of an offer.
- **Professional advisers, regulators and authorities**: where the law requires it or to protect our legal rights.
- **A buyer or successor**: if Brilliantin is sold or restructured.

International transfers

We recruit for clients across the UK, Europe, the US and further afield, so your data may be sent outside the UK. Some of our service providers also store data in the US.

When we transfer data outside the UK, we use one of these safeguards:

- The country has UK adequacy regulations, such as EU and EEA countries, Japan and Canada (commercial organisations).
- The US recipient is certified under the UK Extension to the EU US Data Privacy Framework.
- We sign the ICO International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses.
- You have asked us to introduce you to a client in that country, and the transfer is necessary for that purpose.

You can ask us for details of the safeguard used for any transfer.

How long we keep your data

We keep data only as long as we need it, then delete or anonymise it.

Data	Retention period
Candidate records with no placement	2 years from our last meaningful contact, then deleted unless you ask us to keep in touch
Placed candidate records	6 years from the placement date, for fee, guarantee and legal claim purposes
Right to work copies	Duration of the placement plus 2 years
Client contact records	While we have an active relationship, then 2 years from last contact
Invoices and financial records	6 years from the end of the financial year
Call recordings	[90 days], once notes are made
Website enquiries	12 months unless they lead to an ongoing relationship

We review our database regularly to remove records we no longer need.

Security

We protect personal data with access controls, multi factor authentication, encrypted devices and reputable cloud providers. Only people who need data for their work can access it, and all are bound by confidentiality.

If a breach is likely to put your rights at risk, we will report it to the ICO within 72 hours. If the risk is high, we will also tell you without undue delay.

Your rights and how to complain

You have the right to:

- Access a copy of the data we hold about you
- Have inaccurate data corrected
- Have your data erased
- Restrict how we use your data
- Object to processing based on legitimate interests, including headhunting approaches
- Object to direct marketing at any time
- Receive data you gave us in a portable format, where processing is based on consent or contract
- Withdraw consent at any time, where we rely on it

To use any right, contact nicholas@brilliantin.co.uk. We will respond within one month and there is normally no charge. We may need to confirm your identity first.

If you are unhappy with how we handle your data, please tell us first so we can put it right. You can also complain to the Information Commissioner's Office at ico.org.uk or on 0303 123 1113.

Marketing, cookies and changes to this notice

We send business contacts and candidates occasional updates about relevant roles, candidates and the market. Every email includes a way to unsubscribe, and you can opt out at any time by contacting us. We follow the Privacy and Electronic Communications Regulations.

Our website uses cookies. Details are in our [Cookie Policy link], and you can manage non essential cookies through the banner on the site.

We review this notice regularly. The date at the top shows when it was last updated, and we will tell you about any significant changes.