TRUE

POLICY 12 · WORKER PRIVACY

Worker Privacy Notice

What information TRUE keeps about you and your parent or guardian, why, who sees it, how long we keep it, and your rights.

True Intel Ltd, trading as TRUE · Company no. 17255261

Version 1.0 · Approved by Victoria Phillips, Director · 3 November 2026

This notice explains, in plain English, what information TRUE keeps about you and your parent or guardian, why we keep it, who we share it with, how long we keep it, and what your rights are.

1. Who we are

1.1 TRUE is the trading name of True Intel Ltd, company number 17255261. We decide how your information is used, which makes us the "controller" under data protection law. We are registered with the Information Commissioner's Office (ICO), registration number CSN5763647.

1.2 Victoria Phillips, Director, is responsible for data protection at TRUE. If you have any questions about your information, message us in the TRUE app or email hello@true-agency.co.uk.

1.3 For all research, TRUE follows the Market Research Society (MRS) Code of Conduct: www.mrs.org.uk/standards/code-of-conduct.

2. What we keep about you

Type of information	Examples
Who you are	Your name, date of birth, the result of your ID check, home address, phone number and email.
Your work with us	Assignments you accept, check-in and check-out times and the location at those moments, your reports, survey answers, review decisions and hours.
Pay and tax	Bank details, National Insurance number, tax code, payslips and holiday pay.
Safety	Your emergency contact, any incident or injury reports, and your college or school timetable so we never book work in those hours.
Photos, voice and video	Content you create for unboxing, or recordings of focus groups, only if you opt in under the Image, Voice and Video Consent Policy. You are never photographed in mystery shops, pulse surveys or focus groups.
Things you choose to tell us	Adjustments you ask for, dietary needs for a focus group, and equality monitoring answers. These are always optional.

3. What we keep about your parent or guardian

3.1 If you are under 18, we keep your parent or guardian's name, how they are related to you, their email and phone number, their consent records and when they gave them, and any messages they send us.

4. Why we use your information

Why we use it	Our lawful basis
To run your Worker Agreement: offering assignments, reviewing your work and paying you	Contract
To meet the law on tax, minimum wage, working time, right to work, and health and safety records	Legal obligation
To keep you safe: safeguarding, check-ins and your emergency contact	Legal obligation and legitimate interests. In an emergency, to protect your life.
To get your parent or guardian's agreement while you are under 18	Legitimate interests: keeping young workers safe
To use your photos, voice or video	Your consent and, if you are under 18, your parent or guardian's consent. You can withdraw it at any time.
Equality monitoring	Your consent. It is optional.
To improve our service and prevent fraud	Legitimate interests

4.1 Health information, such as an injury, an adjustment or a dietary need, is extra sensitive. We only use it to meet our safety and employment duties, or with your clear permission, and only the people who need it can see it.

4.2 Our platform automatically applies the age, hours and travel rules when it offers you work. You can always ask a person at TRUE to look at any decision the platform makes.

5. Who we share it with

Who	What they get
Clients	Your findings, scores and survey answers, usually without your name. You are always told which client the work is for. Never your contact details, address or school. Photos, voice or video only if you have opted in.

Who	What they get
Companies that run systems for us	Staffwise, our app hosting, payroll and pension providers. They can only use your information on our instructions, under a contract.
HMRC and our pension provider	Pay, tax and pension details, as the law requires.
Safeguarding services	Children's services, the LADO or the police, only when needed to keep someone safe.
Your parent or guardian, if you are under 18	That you have signed up, and any safety incident or injury. Not your survey answers or reports.

5.1 We never sell your information or use it for advertising.

5.2 If any of our providers stores information outside the UK, we make sure it is protected to the same standard as in the UK.

6. How long we keep it

Information	How long
Your application, if you don't join	6 months
Worker, hours, pay and tax records	6 years after your last assignment
Check-in and check-out locations	12 months
Incident and injury records	At least 3 years, and if you were under 18 at the time, until you turn 21
Safeguarding records	As long as safeguarding guidance requires
Parent or guardian details and consent records	6 years after your last assignment
Photos, voice and video	As the Image, Voice and Video Consent Policy sets out
Equality monitoring answers	Made anonymous after 12 months

7. Your rights

7.1 You have the right to:

- get a copy of the information we hold about you, for free, usually within one month;
- ask us to correct anything that is wrong;
- ask us to delete your information, although we must keep some records by law;

- ask us to stop or limit how we use it, or object to how we use it;
- get your information in a format you can take elsewhere; and
- withdraw your consent at any time, where we rely on it.

7.2 At 16 you can use these rights yourself. Your parent or guardian can help you, but we will usually ask you before sharing your information with them, unless it is about your safety.

7.3 To use any of your rights, message us in the app or email hello@true-agency.co.uk.

8. Keeping it safe

8.1 Your information is encrypted, and only the people who need it can see it. Location is only recorded when you check in or out. Everyone at TRUE is trained in data protection.

9. Complaints

9.1 If you are unhappy with how we use your information, please tell us first and we will try to put it right. You can also complain to the Information Commissioner's Office at ico.org.uk.

10. Changes to this notice

10.1 We will tell you in the app if we change this notice. You confirm digitally in the app that you have read it when you sign up. No paper signatures are used.

Version	Approved by	Approved on	Next review
1.0	**Victoria Phillips, Director**	**3 November 2026**	**November 2027**