

Call Recording Policy

POLICY PURPOSE

The purpose of this policy is to govern the procedures for telephone call recording within Gi Recruitment Ltd and the management of access to, and use of, the recordings. The policy aims to minimise intrusion by restricting the recording of calls, the access to, and use of these recordings to limited and specific purposes.

PURPOSE OF CALL RECORDINGS

Calls may be recorded and retained for the following purposes:

- To monitor the quality of call handling and customer service and to ensure the information we provide is consistent and accurate;
- Staff training, coaching and support;
- To verify what was discussed within the call should a dispute or complaint arise;
- To protect staff from abusive behaviour;
- To verify the customer's agreement during certain service requests;
- Calls may also be used as evidence within an investigation should a misconduct, performance, or capability concern arise;
- To verify the details of the call for the purposes of, or in connection with, any legal proceedings.

RECORDING INFORMATION

Calls made to Gi Recruitment Ltd on the landline may be recorded. The telephone lines have the function to save a recording of both inbound and outbound calls. Gi Recruitment Ltd uses a company called 8x8, which provides the 8x8 storage and retrieval system.

RETENTION AND STORAGE OF CALL RECORDINGS

All recordings will be deleted after 30 days, unless retained for a specific business or legal purpose, whereby the recording will be kept in line with the applicable data retention policy, the policy can be requested via email: UK.privacy@gigroup.com.

8x8 uses AES-256 encryption for all saved call recordings. An advanced encryption standard (AES) 256 and symmetric encryption algorithm that uses

a 256-bit key that converts the voice data into a cipher. A cipher is code that is unreadable and effectively unidentifiable text that neither humans nor computers can understand.

ACCESS TO CALL RECORDINGS

Access to call recordings are controlled in line with principles under GDPR Data Protection legislation.

The caller and/or the recipient have access to download the call for the reason explained above in the purpose of call recordings section.

Should any other employees of Gi Recruitment Ltd require access to call recordings, permission to access must be granted by the appropriate Director.

Call recordings can be obtained by Line Managers for training, security and quality assurance purposes.

Specific call recordings may be accessed by Line Managers, the People Team or any Disciplinary Hearing Panel as evidence in relation to any disciplinary process. In these cases, requests for access must be made in writing to uk.privacy@gigroup.com.

User access to download calls is restricted to the IT department and the user as standard.

The UK Data Protection legislation, GDPR, allows a data subject access to information that we hold about them. This includes recorded telephone calls. Therefore, the recordings will be stored in such a way to enable the General Data Protection Regulations Representative to retrieve information relating to one or more individuals as easily as possible.

All categories of call covering inbound and outbound can apply via a Subject Access Request for a copy of the recording. Requests for access must be made in writing to uk.privacy@gigroup.com. The request must include date, time and contact names.

Any unauthorised access or browsing of recordings for no valid reason is not permitted and may lead to disciplinary action.

ADVISING OF THE CALL RECORDING FACILITY

Gi Recruitment Ltd will make every reasonable effort to communicate that calls will be recorded. This will be done by:

- Notification detailed in the Privacy statements on the Gi applicant portal, Spinner;
- Using a recorded message within the auto attendant facility to inform callers that their call is being recorded;
- Reminding the caller that the call is being recorded should they be displaying abusive behaviour and that the call's contents may be reviewed by management;
- The Call Recording policy is published on the Gi Recruitment Ltd UK website.

Disclaimer: This policy is meant to provide general guidelines and should be used as a reference. It may not take into account all laws and is therefore not a legal document. The Company will not assume any legal liability that may arise from the use of this policy.

Signed: Paulo Canoa – Chief Regional Officer UK & Ireland and Country Manager UK & Ireland
Date: January 2026

