

Privacy Policy

Information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are "special categories" of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Business contact details such as name, company, telephone numbers, and business email addresses.
- Personal contact details such as name, telephone numbers, and personal email addresses.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).

Personal information collection

We collect your personal information through the "Contact us", "Case studies" or "Job application" forms.

How information about you is used

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest.

We need all the categories of information in the list above (see The kind of information we hold about you) primarily to allow us to perform our contract with you, to enable us to comply with legal obligations and to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

Use of your personal information

The situations in which we will process your personal information are listed below.

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Responding to "Contact us" requests.
- Providing "Case Study" information.
- Processing Job Application requests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
 - Where it is needed in the public interest
-

Legal Processing

We rely on the following legal bases to use your personal data:

- **Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. Typically responding to requests for information.
- **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).
- **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- **Consent:** You will have freely given clear consent for us to process their personal data for a specific purpose.

Data sharing

Sharing with third parties

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Third-party service providers

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Sharing with other entities in the group

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, for system maintenance support and hosting of data Acosta Europe is owned by Acosta Inc and there will be occasions where for business operational purposes we will share your personal data with them. Please see 'Transferring information outside the EU' below for more information.

Other third parties

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business or when bidding for new work. When we have a contract with a third party to provide services we may share personal data with them to the extent required to fulfil that contract for service. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business

need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a worker or contractor of the company we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
 - **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
 - **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
 - **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
 - **Request the transfer** of your personal information to another party.
-

- **Withdraw consent** you can withdraw consent by updating your profile information through your account page. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data protection compliance

We have appointed a Privacy Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact them. You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the Privacy Officer by emailing "Privacy.officer@acosta-europe.com".
