

PRIVACY AND COOKIES POLICY

INTRODUCTION

Welcome to People Activation Limited's privacy notice.

People Activation Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website www.peopleactivation.com (our 'website') (regardless of where you visit it from) and when you provide data to us by other means (including, but not limited to, when you request our services or make an enquiry with us (please see section 3 below). This policy will also inform you about your privacy rights and how the law protects you.

Please also use the Glossary at section 10 below to understand the meaning of some of the terms used in this privacy notice.

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy notice

This privacy notice aims to give you information on how People Activation Limited collects and processes your personal data. This will include any data you may provide to us when requesting or receiving our services, using our website submit an enquiry with us, apply for a job with us or when you share this information to us by email, telephone, mail, in person or otherwise. For clients, this will include employee contact details for the purpose of providing our services to you.

Our website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or

processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

People Activation Limited ('we', 'us' or 'our') is the controller and responsible for your personal data.

We have appointed a data privacy manager (DPM) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights (please see section 9 below), please contact the data privacy manager using the details set out below.

Contact details

Full name of legal entity: People Activation Limited (Company number: 599 1337)

Name or title of data privacy manager: Abigail Humayun, Founder / Director

Email address: abi@peopleactivation.com

Telephone number: 0161 236 0770

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 10th July 2018 and historic versions can be obtained by contacting us.

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

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, username or similar identifier, title, date of birth, gender

and national insurance number.

- Contact Data includes address, email address and telephone numbers.
- Financial Data includes bank account and payment details.
- Transaction Data includes details about payments to and from you and other details of services provided to you, namely recruitment services.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- Profile Data includes business development and networking information, your interests, preferences [feedback and survey responses], employment history, salary, references and referees, benefits package, professional

development, training, professional memberships, business plan, disciplinary details and proceedings, skills and attributes, education details, qualifications and other similar information. This will usually only be relevant for our employees who will also receive a separate privacy notice.

- Usage Data includes information about how you use our website and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Criminal Convictions and Offences Data includes details about your criminal convictions and offences.
- Special Categories of Personal Data includes details about your race or ethnicity, religious beliefs, sexual orientation, information about your health and genetic and biometric data.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Profiling

We do not undertake any automated profiling.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to

perform the contract we have or are trying to enter into with you for the purposes of providing our services. In this case, we may be unable to provide the information or services you have requested but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact, [Special Categories] of Personal Data and Financial Data by filling in forms, registering with us, joining our mailing list, enquiring about or purchasing a service, or by corresponding with us by post, phone, email or otherwise. This also includes personal data you may provide when you:
 - wish to become a client;
 - subscribe to our latest legal industry opinions, interview, insights and more;
 - sign up for our seminars and events;
 - request marketing or information on our services to be sent to you;
 - [enter a competition, promotion or survey]; or
 - give us some feedback.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy provided in section 4 below for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:
 - Technical Data from the following parties:

- (a) analytics providers such as Google based outside the EU; and
 - (b) search information providers based inside the EU.
- Identity, Contact and Profile Data from third parties and publicly available sources such as Google, LinkedIn, Twitter, Facebook and other social media sources
 - Contact Data from your current employer.

Special Category Data

We do not usually collect the following Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). In the event we need to process this data, we will keep you informed and will always obtain your explicit consent when required.

We kindly request that you do not provide us with any Special Category Data (including within the content of your CV) unless you are specifically requested to do so.

Employees and Personnel

Please note, we have a separate privacy notice available for our employees and other personnel, which provides the details on how we process your data.

4. How we use your personal data

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

- Where it is necessary for our legitimate interests (including providing some of our recruitment services) and your interests and fundamental rights do not override those interests.

- Where we need to perform the contract we are about to enter into or have entered into with you (or your employer).
- Where we need to comply with a legal or regulatory obligation.
- To a purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling.
- On the basis of consent when you join our email database.

Please note: You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the tables below.

Clients:

For employer client's/prospective employer clients, we may collect and process certain personal data about your organisation and individuals within your organisation as follows:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
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To register you with us as a client and/or to register an account for you	(a) Identity Data (b) Contact Data (c) Profile Data (d) Transaction Data	(a) Necessary for our legitimate interest to provide our services to you (b) On the basis of your explicit consent
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity Data (b) Contact Data (c) Usage Data (d) Marketing and Communications Data (e) Technical Data	Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)
To provide services to you and assist you with a particular project	(a) Identity Data (b) Contact Data (c) Usage Data (d) Marketing and Communications Data (e) Technical Data (f) Transaction Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to deliver our services and help our business grow)
To provide you with relevant information that we think will be of interest to you, such as information relating to services, industry insights, opinion pieces, surveys and event invitations.	(a) Contact Data (b) Identity Data	Necessary for our legitimate interests (to develop our services and grow our business)

To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity Data (b) Contact Data (c) Technical Data (d) Usage Data	Necessary for our legitimate interests (to develop our services and grow our business)
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Website users:

For website users, we may collect and process your personal data as follows:

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Technical Data	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Usage Data, (b) Marketing and Communications Data (c) Technical Data	Necessary for our legitimate interests (to study how individuals use our website, to develop it, to grow our business and to inform our marketing strategy)

To use data analytics to improve our website, services, marketing, customer relationships and experiences	(a) Technical Data (b) Usage Data	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity Data (b) Contact Data (c) Technical Data (d) Usage Data (e) Profile Data	Necessary for our legitimate interests (to develop our services and grow our business)

Job Applicants

For individuals who apply for jobs with us, we may collect and process your personal data as follows:-

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To process your job application	(a) Contact (b) Identity (c) Profile (d) Special category	(a) Necessary for our legitimate interests to assess your suitability (b) For special category, on the basis of your explicit consent

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, joined our email database or we have provided our services to you, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We do not share your personal data with third parties for marketing purposes.

New Clients

As part of running our business and within our legitimate interests, we may try and engage with you as a new client, to see if we would benefit from working together in future. If we do this, we will always ensure you are happy to continue as well as providing details of our intention, ensuring this Policy is available and giving you the opportunity to unsubscribe.

Opting out

You can ask us to stop sending you marketing messages at any time by contacting us or clicking the unsubscribe link in the email. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase or placing an order.

COOKIES

What's a cookie?

A "cookie" is a piece of information that is stored on your computer's hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.

Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

How do we use cookies?

We use cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. By continuing to browse this site, you are agreeing to our use of cookies.

Cookies are either:

- Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer; or
- Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the websites that created it when you visit that website again. We may use persistent cookies for Google Analytics and for personalisation (see below).

Cookies can also be categorised as follows:

- **Strictly necessary cookies:** These cookies are essential to enable you to use our website effectively, such as when registering on our website, and therefore cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
- **Performance cookies:** These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.
- **Functionality cookies:** These cookies allow our website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.
- **Personalisation cookies:** These cookies help us to provide our services specific to you. These cookies are persistent (for as long as you are registered with us) and mean that when you log in or return to our website, you may see information similar to that you have previously browsed.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the tables in paragraph 4 above.

- Internal third parties such as, our employees or officers who are based in the United Kingdom and provide IT and/or system administration services.
- External third parties such as:
 - specialist IT support, suppliers and sub-contractors for the performance of our website and for our software, mobile phones, computers, laptops and other IT systems; including [];
 - other outsourced service providers of accounting and payroll services, HR and marketing services including [];
 - professional advisers including lawyers, bankers, accountants and insurers who provide consultancy, banking, legal, insurance and accounting services;

- HM Revenue & Customs, regulators and other authorities who require reporting or processing activities in certain circumstances;
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA). However, our employees and officers will also be able to access emails and our IT systems whilst outside the EEA, in the course of their employment. This does mean that your personal data is accessible whilst outside the EU, however, we have assessed the risk and ensured adequate safeguards are in place. Please contact us for further details.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, contractual and/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.

We will usually keep data for the following durations:-

- Client data – throughout the service provision and for up to 3 years after
- Website user 6 years
- Employees/Personnel of Clients up to 3 years after service provision
- Marketing database members – 6 years

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data as follows:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want

us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

Right to complain

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract to which you are a party.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.