

Privacy Policy

PROTECTING YOUR PRIVACY

At Transforming PLC ("we", "Transforming", "the Company"), we are committed to safeguarding your privacy and ensuring compliance with the **UK GDPR** and the **Data Protection Act 2018**. This privacy policy explains how we collect, use, process, and protect your personal data when you interact with us, including through our website, digital platforms, and advertisements on **Facebook**, **LinkedIn**, and other third-party platforms.

We are dedicated to ensuring that your privacy is respected and protected. Any personal data you provide to us will only be processed in accordance with this policy and applicable legal requirements.

Transforming PLC is the Data Controller responsible for your personal data under this Privacy Policy. Our registered office address is: Transforming PLC, New City Court, 20 St Thomas St, London SE1 9RS, United Kingdom.

WHAT INFORMATION WE COLLECT

We may collect and process the following types of personal data:

1. **Personal Identification Information:** Name, address, email address, telephone number, and other contact details.
2. **Professional Information:** Current job title, employer, salary, earnings, benefits, and qualifications.
3. **Demographic Information:** Postcode, preferences, and interests.
4. **Employment Application Information:** CVs, cover letters, references, compliance documentation, and any other information provided as part of the recruitment process.
5. **Interaction Data:** Information collected via interactions with our website, social media platforms, or third-party advertisements, including IP addresses, device data, and browser types.
6. **Cookies and Usage Data:** Data collected through cookies and similar technologies (see "How We Use Cookies" below).

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Our services are not intended for children under 18 years of age. We do not knowingly collect personal data relating to children. If we become aware that we have collected personal data from a child without obtaining appropriate consent, we will promptly delete such information.

HOW WE COLLECT YOUR DATA

We may collect personal data from you in the following ways:

- **Direct Submission:** When you submit an application, CV, or other forms via our website or email.
 - **Third-Party Platforms:** Data submitted through advertisements or forms on platforms such as Facebook, LinkedIn, and Google Ads.
 - **Website Usage:** Automated technologies, such as cookies, collect data when you interact with our website.
 - **Third-Party Services:** Data obtained from background checks, criminal record checks, or qualification verifications conducted by competent organisations.
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PURPOSES FOR PROCESSING YOUR DATA

We process personal data for the following purposes:

- To assist in recruitment and employment selection processes.
- To conduct equal opportunity monitoring in line with legal obligations.
- To communicate with you about updates, services, and opportunities.
- To analyse website and advertisement performance to improve user experience.
- To comply with legal and regulatory requirements, including employment laws.

We ensure that all uses of your data are lawful, fair, and transparent, in line with Article 5 of the UK GDPR.

We rely on the following lawful bases under Article 6 of the UK GDPR to process your personal data:

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Consent (Article 6(1)(a)) – where you have given explicit consent, e.g., receiving marketing communications.

Contractual Necessity (Article 6(1)(b)) – where processing is required to perform a contract with you or to take steps at your request prior to entering into a contract.

Legal Obligation (Article 6(1)(c)) – where we must process your data to comply with UK law, e.g., employment checks.

Legitimate Interests (Article 6(1)(f)) – where processing is necessary for our legitimate business interests, provided these are not overridden by your rights (e.g., recruitment activities, improving services, website analytics).

Where we rely on consent, you may withdraw it at any time.

THIRD-PARTY DATA MANAGEMENT AND SHARING

We may share your personal data with third parties for the following purposes:

1. Processing on Our Behalf:

- Certain third-party service providers (e.g., IT providers, cloud hosting services, or marketing agencies) may process your data on our behalf. These providers are bound by strict confidentiality agreements and data processing contracts to comply with UK GDPR.

2. Recruitment and Compliance:

- Disclosure to nominated referees, educational institutions for qualification verification, and background check providers.
- Disclosure to governmental bodies or regulatory authorities as required by law.

3. Advertising Platforms:

- Data submitted via our Facebook, LinkedIn, or Google Ads forms may be processed by these platforms in accordance with their privacy policies. We take steps to ensure that any data collected via these platforms is handled securely and used solely for the purposes outlined in this policy.

4. Financial Institutions:

- Sharing data with banks or financiers for legitimate business purposes.

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We do not sell, distribute, or lease your personal information to third parties unless we have your explicit consent or are required to do so by law.

We may use automated tools and profiling in limited circumstances, such as:

Screening CVs and applications to match candidates with vacancies.

Delivering tailored advertising on platforms such as Facebook and LinkedIn.

We ensure that meaningful human review is available where significant decisions are made, and you have the right to request human intervention, express your point of view, and contest automated decisions.

WHERE WE STORE AND PROCESS YOUR DATA

1. Storage:

- Personal data is securely stored on our servers, which are protected by strict access controls. We use encryption and other technical safeguards to prevent unauthorised access.

2. Processing:

- Data submitted via third-party advertising platforms, such as **Facebook Lead Ads** or **LinkedIn Sponsored Content**, may be processed outside the UK. In such cases, we ensure compliance with the UK GDPR by implementing data transfer safeguards, such as standard contractual clauses (SCCs) or adequacy decisions.

3. Retention:

- We retain personal data only for as long as necessary to fulfil the purposes for which it was collected or as required by law.

In particular:

Recruitment Data (e.g., CVs, application forms): normally retained for up to 12 months after the recruitment process ends, unless you consent to longer retention.

Employee Records: retained in accordance with employment law requirements (generally up to 6 years after employment ends).

Marketing Data: retained until you withdraw consent or opt out.

We securely delete or anonymise data once the retention period has expired.

HOW WE USE COOKIES

Cookies are small files stored on your computer to improve your experience on our website. We use cookies for:

- **Analysing Website Traffic:** Traffic log cookies help us understand which pages are most visited, allowing us to improve our content and user experience.
- **Tailored Advertising:** Cookies enable us to show you relevant advertisements on third-party platforms based on your browsing history.

You can control your cookie preferences through your browser settings. Some features of our website may not function properly if cookies are disabled.

During your first visit, a cookie banner will request your consent for non-essential cookies (e.g., for analytics or advertising purposes). You can manage or withdraw your cookie preferences at any time through our cookie settings panel or your browser. Essential cookies (necessary for website functionality) will always be active.

YOUR RIGHTS UNDER THE UK GDPR

You have the following rights regarding your personal data:

1. **Right to Access:**
 - Request details of personal data we hold about you.
2. **Right to Rectification:**
 - Request corrections to inaccurate or incomplete personal data.
3. **Right to Erasure:**
 - Request deletion of your data where it is no longer necessary for the purposes for which it was collected (subject to legal obligations).
4. **Right to Restrict Processing:**
 - Request restricted processing of your data under certain conditions.
5. **Right to Data Portability:**

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- Receive a copy of your data in a structured, commonly used format.

6. Right to Object:

- Object to the processing of your data for marketing purposes or other legitimate interests.

7. Right to Withdraw Consent:

- Withdraw consent at any time where processing is based on your consent.

To exercise your rights, please contact us at [**feedback@transforming.plc.uk**](mailto:feedback@transforming.plc.uk).

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Website: www.ico.org.uk

Helpline: 0303 123 1113. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us first:

[**feedback@transforming.plc.uk**](mailto:feedback@transforming.plc.uk) or [**Beata.Kozlowska@transformingsupport.uk**](mailto:Beata.Kozlowska@transformingsupport.uk).

HOW WE PROTECT YOUR DATA

We have implemented robust technical, physical, and managerial safeguards to protect your data:

- **Encryption:** Data is encrypted during transmission and at rest.
- **Access Controls:** Access to personal data is restricted to authorised personnel only.
- **Training:** Employees are trained on data protection policies and procedures.
- **Data Minimisation:** We limit the collection and retention of personal data to what is necessary.

LINKS TO THIRD-PARTY WEBSITES

Our website may include links to external websites. Please note that we do not control these websites and are not responsible for their privacy practices. We encourage you to review the privacy policies of any external sites you visit.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to update this privacy policy to reflect changes in legal requirements, business practices, or technological advancements. Any updates will be posted on this page, and where required, we will notify you via email or other means.

This policy is effective as of September 2025.

ADDITIONAL CLAUSES FOR ADVERTISING DATA

1. Data collected via third-party advertising platforms is processed in compliance with UK GDPR.
2. Any consent obtained through forms on Facebook, LinkedIn, or other platforms will be securely recorded and used solely for the stated purposes.

If you have any questions or concerns about this policy or how your data is handled, please contact us at:

Email: feedback@transforming.plc.uk

Address: Transforming PLC, New City Court, 20 St Thomas St, London SE1 9RS UK.

We have appointed a Head of Quality, Governance and Data Protection to oversee compliance with this Privacy Policy: Beata.Kozłowska@transforming.uk

Address: Transforming PLC, New City Court, 20 St Thomas St, London SE1 9RS, United Kingdom.