



Preos Policy Data Privacy and Cookie

Last Reviewed: October 2024

preos.

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Contents

.....	1
1. Introduction.....	3
2. Information About Who We Are.....	3
3. The Personal Data That We Collect	3
4. Purposes of Processing and Legal Bases	4
5. Providing Your Data to Others	5
6. International Transfers of Your Personal Data.....	6
7. Retaining and deleting personal data.....	6
8. Your rights	7
9. About Cookies	8
10. Use of Cookies	8
11. Categories of Cookies	8
12. Preos Cookies	10
13. Managing Cookies.....	11
14. Credit.....	12
15. Amendments.....	12

1. Introduction

1.1 Preos (Preos Talent Ltd) [referred to as "we", "us", "our"] is committed to safeguarding the privacy of our website visitors, our employees, our clients, associates, suppliers and service users. In this policy we explain how we will handle your personal data.

1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

1.3 We use cookies to collect information on the website. The collection of such information helps us to facilitate your browsing of the website; it enables us to improve the website, to promote trust and safety and to monitor the web page flow of the website.

1.4 When you submit details via our website or do business with us, you will be asked for information which affects how we will process your personal data. You can specify whether you would like to receive direct marketing communications. You can opt out of receiving marketing communications with us at any point by clicking the unsubscribe link in our marketing emails or by emailing us directly at info@preos.co.uk.

2. Information About Who We Are

2.1 Who are we?

Preos is a consultancy firm specialised in Workday optimisation. As such, we help our clients get the most out of their Workday investment by providing tailored expert support for all Workday solutions.

We are a Limited company registered in England with registration number 12052810 – registered address 16b New Quebec Street, London, England, W1H 7RU.

For more information about our company, visit our website www.preos.co.uk.

2.2 Data Controller or Data Processor

For the purpose of this policy, we are the Data Controller (as defined by the Data Protection Act 1998 and all applicable laws which replace or amend it, including the General Data Protection Regulation). As the Data Controller we will collect and process your personal data.

3. The Personal Data That We Collect

3.1 In this Section 3, we have set out the general categories of personal data that we may process.

3.1.1 We may process data enabling us to get in touch with you ("**contact data**"). The contact data may include your name and email address. The source of the contact data is you.

3.1.2 We may process your account data ("**account data**"). Account data may include your name and email address. The source of the account data is you or your employer.

3.1.3 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as

information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics, a widely used analytics platform.

3.1.4 In the case of **Associates** and **Candidates**, we may process your information included in your personal profile ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, your professional biography and CV, your skills and experience, availability and associated information required to match you with opportunities. The source of the profile data is you and by providing this data you are providing consent for us to use this data as described below.

3.1.5 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include contact details, invoicing and account details, and specifications. The source of the service data is you or your employer.

3.1.6 We may process information contained in or relating to any communication that you send to us or that we send to you ("**communication data**"). The communication data may include the communication content and metadata associated with the communication.

3.1.7 We may process information contained in any enquiry you submit to us regarding research reports, products and/or services ("**enquiry data**").

3.1.8 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**").

3.1.9 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms.

3.2 Please do not supply any other person's personal data to us unless we prompt you to do so.

4. Purposes of Processing and Legal Bases

4.1 In this Section 4, we have set out the purposes for which we may process personal data and the legal bases of the processing.

- **Operations** - We may process your personal data for the purposes of operating our website, providing our services, record-keeping, generating invoices, bills and other payment-related documentation, and credit control. The legal basis for this processing is our legitimate interests, namely the proper administration of our website, services and business, or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- **Relationships and communications** - We may process contact data, account data, and/or communication data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, social media, SMS and/or telephone, providing support services and complaint handling. The legal basis for this processing is our legitimate interests, namely communications with our website visitors, clients, associates and suppliers, the maintenance of relationships, and the proper administration of our website, services and business.

- **Direct marketing** - We may process contact data, account data, enquiry data, notification data and/or usage data for the purposes of creating, targeting and sending direct marketing communications by email, social media, SMS and/or making contact by telephone for marketing-related purposes. The legal basis for this processing is consent.
- **Research and analysis** - We may process usage data and/or enquiry data for the purposes of researching and analysing the use of our website and services, as well as researching and analysing other interactions with our business. The legal basis for this processing is our legitimate interests, namely monitoring, supporting, improving and securing our website, services and business generally.
- **Record keeping** - We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to run our business properly and efficiently in accordance with this policy.
- **Security** - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our website, services and business, and the protection of others.
- **Legal claims** - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- **Legal compliance and vital interests** - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

5. Providing Your Data to Others

5.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.

5.2 In the case of Associates and Employees, we may disclose profile data to clients without notice for the purposes of matching your skills to relevant opportunities and securing work for the business and for you. By providing information for your profile you are assumed to have done so for this purpose.

5.3 Financial transactions are recorded on Xero. We will hold transaction data with our services provider only to the extent necessary for the purposes of processing invoices, payments and refunds, and dealing with queries and complaints relating to such payments and refunds. You can find information about our financial systems provider's privacy policies and practices <https://www.xero.com/uk/gdpr>

5.4 In addition to the specific disclosures of personal data set out in this Section 5, we may disclose your personal data where such disclosure is necessary for compliance with a legal

obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5.5 We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5.6 We will not sell, loan or share your personal data to other organisations for the purposes of marketing their services unless you ask us to do so.

6. International Transfers of Your Personal Data

6.1 In this Section 6, we provide information about the circumstances in which your personal data may be transferred to a third country under UK data and/or EU data protection law.

6.2 We may transfer your personal data from the European Economic Area (EEA) to the UK and process that personal data in the UK for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which the UK is not treated as a third country under EU data protection law or benefits from an adequacy decision under EU data protection law and we may transfer your personal data from the UK to the EEA and process that personal data in the EEA for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which EEA states are not treated as third countries under UK data protection law or benefit from adequacy regulations under UK data protection law. Transfers will be protected by appropriate safeguards, which will include password protected files and secure email transfer.

7. Retaining and deleting personal data

7.1 This Section 7 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

7.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

7.3 We will retain your personal data as follows:

(a) **contact data** will be retained for a maximum period of two years following the date of the most recent contact between you and us;

(b) **account data** will be retained for a maximum period of two years following the date of closure of the relevant account;

(c) **usage data** will be retained indefinitely for the purpose of monitoring the historical performance of our website, however personal data beyond the ISP will not be linked to this data;

(d) **profile data** will be deleted on request or within two years of your last communication with us;

(e) **service data** will be retained for a maximum period of two years after our last transaction with you;

(f) **communication data** will be retained for a maximum period of 2 years following the date of the communication in question;

(g) **enquiry data** will be deleted on request or maintained for a maximum period of 2 years following the date of collection;

(h) **notification data** will be retained for a maximum period of two years following our last contact with you;

7.4 Notwithstanding the other provisions of this Section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person.

8. Your rights

8.1 In this Section 8, we have listed the principal rights that you have under data protection law:

(a) **the right to access** - you can ask for copies of your personal data;

(b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;

(c) **the right to erasure** - you can ask us to erase your personal data;

(d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;

(e) **the right to object to processing** - you can object to the processing of your personal data;

(f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;

(g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and

(h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

8.2 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting [\[Guidelines, Recommendations, Best Practices | European Data Protection Board \(europa.eu\)\]](#) and [\[Subject access requests \(also known as SARs or right of access\) | ICO\]](#).

8.3 You may exercise any of your rights in relation to your personal data [by written notice to us, using the **contact details** set out below].

8.4 Contact Us

If you have any concerns about how your personal data is being collected and processed, 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). However, we would appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

By post: Data Protection Officer
Preos Talent Ltd
16b New Quebec Street
London, W1H 7RU

By email: info@preos.co.uk
dpo@preos.co.uk

9. About Cookies

9.1 A cookie is a small text file that a website stores on your computer or mobile device when you visit the site. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes those cookies. Cookies are useful because they allow a website to recognise a user's device.

9.2 The purpose is to enable the site to remember your preferences (such as username, language, etc.) for a certain period of time. That way, you don't have to re-enter them when browsing around the site during the same visit.

9.3 Cookies can also be used to establish anonymized statistics about the browsing experience on our sites.

9.4 We have summarised the categories of our cookies in the Section 11 below 'Categories of Cookies'.

10. Use of Cookies

10.1 Every time you visit Preos's website, you will be prompted to accept or refuse cookies.

10.2 If you decline or reject all cookies, you may not be able to access some parts of the website, and some features may not function properly or be available to you.

10.3 If you choose to accept our cookies, you can also delete such cookies later from your computer (see the 'Managing Cookies' Section 13 below). If you delete the cookies, any settings and preferences controlled by those cookies will be deleted and will need to be recreated when you visit the website subsequently.

11. Categories of Cookies

11.1 We mainly use 4 categories of cookies:

- **Necessary cookies** - These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your

privacy preferences, or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the website will not then work. These cookies do not store any personally identifiable information.

- **Performance cookies** - These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our website. They help us to know which pages are the most and least popular and see how visitors move around the website.

All information collected by these cookies is aggregated and therefore anonymous. It is only used to improve the performance of a website.

- **Functional cookies** - These cookies allow websites to remember choices you make (such as your username, language or the region you are in) and to provide enhanced and more personal features. For example, a website may be able to provide you with local weather reports or traffic news by storing the region in which you are currently located in a cookie. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on websites other than the website you are visiting. Without those cookies, the site might not fully function properly.
- **Targeted cookies** - These cookies are used to deliver adverts that are more relevant to you and your interests when you browse the internet. They are placed by a third party when you interact with embedded content, such as YouTube and LinkedIn videos and links. You have the option of whether to enable these cookies.

11.2 As well as the above categories, cookies can be further classified by type. These help to determine which domain is setting the cookie and how long it will remain on your device:

- **Session cookies:** These cookies are temporary and are only active whilst your browser session is open. These cookies will be removed when you close your browser.
- **Persistent cookies:** These cookies have expiration dates and will stay on your device for a set period of time. Once this period has elapsed, they will be removed from your device.
- **First-party:** These are cookies set by us directly. Only we can retrieve their data and we don't share this information with other sites. Although we work with other third parties to provide these cookies, only we can view the contents.
- **Third-party:** These are cookies that are set by a different domain. We can't view or collect any information from these types of cookies.

12. Preos Cookies

12.1 Strictly Necessary Cookies

Provider	Cookie Name	Purpose	Cookie Type
CookieYes	cookieyes-consent	to remember users' consent preferences so that their preferences are respected on subsequent visits to this site. It does not collect or store any personal information about the site visitors	First party / persistent
Leadfeeder	_lfa	to identify the IP address of devices visiting the website, in order to retarget multiple users routing from the same IP address	First party / persistent
Google Recaptcha	_GRECAPTCHA	to identify bots to protect the website against malicious spam attacks	Third party / persistent

12.2 Performance Cookies

Provider	Cookie Name	Purpose	Cookie Type
Google Analytics	_ga_*	to store and count page views	First party / persistent
Google Analytics	_ga	to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors	First party / persistent
LinkedIn	AnalyticsSyncHistory	to store information about the time a sync took place with the lms_analytics cookie	Third party / persistent
Google Analytics	_gid	to store information on how visitors use a website while also creating an analytics report of the website's performance. Some of the collected data includes the number of visitors, their source, and the pages they visit anonymously	First party / persistent
Google Analytics	_gat_gtag_UA_*	to store a unique user ID	First party / persistent
YouTube	CONSENT	YouTube sets this cookie via embedded YouTube videos and registers anonymous statistical data	Third party / persistent


12.3 Functional Cookies

Provider	Cookie Name	Purpose	Cookie Type
LinkedIn	Lidc	to facilitate data centre selection	Third-party / persistent
LinkedIn	UserMatchHistory	for LinkedIn Ads ID syncing	Third-party / persistent
LinkedIn	li_gc	for storing visitor's consent regarding using cookies for non-essential purposes	Third-party / persistent

12.4 Targeting Cookies

Provider	Cookie Name	Purpose	Cookie Type
YouTube	YSC	to track the views of embedded videos on YouTube pages	Third-party / session
YouTube	VISITOR_INFO1_LIVE	to measure bandwidth, determining whether the user gets the new or old player interface	Third-party / persistent
LinkedIn	li_sugr	to collect user behaviour data to optimise the website and make advertisements on the website more relevant	Third-party / persistent
LinkedIn	Bcookie	LinkedIn sets this cookie from LinkedIn share buttons and ad tags to recognize browser IDs	Third-party / persistent
LinkedIn	Bscookie	to store performed actions on the website	Third-party / persistent
YouTube	yt-remote-device-id	to store the user's video preferences using embedded YouTube videos	Third-party / persistent
YouTube	yt-remote-connected-devices	to store the user's video preferences using embedded YouTube videos	Third-party / persistent

13. Managing Cookies

13.1 If you are visiting from the UK or EEA, you can manage your cookie preferences using the embedded cookie preference tool, which can be found by clicking  in the bottom left-hand corner of the screen.

13.2 Removing cookies from your device

13.1.1 You can delete all cookies that are already on your device by clearing the browsing history of your browser. This will remove all cookies from all websites you have visited.

13.1.2 Be aware though that you may also lose some saved information (e.g. saved login details, site preferences...).

13.1.3 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

13.1.4 You can adjust your device's web browser settings by using the 'Help' function within the web browser. You can also visit aboutcookies.org to obtain instructions on how to adjust the web browser setting of your device. That site contains comprehensive information on how to adjust your web browser settings for a wide variety of web browsers.

13.1.5 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser and from version to version.

13.1.6 You can obtain up-to-date information about managing cookies via these links:

<https://support.google.com/chrome/answer/95647> (Chrome);

<https://support.mozilla.org/en-US/products/firefox/privacy-and-security> (Firefox);

<https://help.opera.com/en/latest/security-and-privacy/> (Opera);

<https://support.apple.com/en-gb/guide/safari/welcome/mac> (Safari); and

<https://support.microsoft.com/en-gb/windows/microsoft-edge-browsing-data-andprivacy-bb8174ba-9d73-dcf2-9b4a-c582b4e640dd> (Edge).

13.1.7 Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

14. Credit

14.1 This document was created using a template from SEQ Legal (<http://www.seqlegal.com>).

15. Amendments

15.1 We may update this policy from time to time by publishing a new version on our website.

15.2 You should check this page occasionally to ensure you are happy with any changes to this policy.