

ProSyft Ltd.

Privacy Policy

Document owner	Privacy / Data Protection Lead (COO)	Version	2.0
Approved by	CEO / Founder	Date	1 July 2026
Applies to	ProSyft's own processing	Companion doc	Terms of Use

ProSyft Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, www.prosyft.com ("Our Site"), and only collect and use your personal data as described in this Privacy Policy. Any personal data we collect will only be used as permitted by law.

Please read this Privacy Policy carefully and ensure that you understand it.

1. Information About Us

Our Site is owned and operated by ProSyft Ltd, a limited company registered in England under company number 15714615.

Registered address: 7 Bell Yard, London, England, WC2A 2JR

We are not required to appoint a statutory Data Protection Officer. If you have any questions about this privacy notice, or issues arising from it, you should contact Spencer John, who is responsible for matters relating to data protection at our organisation, including any matters in this privacy notice. You can contact them using the details set out in Part 10.

We may issue you with other privacy notices from time to time, including when we collect personal information from you. This privacy notice is intended to supplement these and does not override them.

2. What Does This Policy Cover?

This Privacy Policy applies to your use of Our Site and to personal data we hold about our business contacts, enquirers, and suppliers. Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites, and we advise you to check the privacy policies of any such websites before providing any data to them.

This Privacy Policy governs ProSyft's own processing of personal data.

3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

Personal data is, in simpler terms, any information about you that enables you to be identified. It covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 10.
- The right to access the personal data we hold about you. Part 9 will tell you how to do this.
- The right to have your personal data rectified if any of the personal data we hold about you is inaccurate or incomplete.
- The right to be forgotten, that is, to ask us to delete or otherwise dispose of any of your personal data that we hold, in the circumstances allowed by law.
- The right to restrict (that is, prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.
- The right to withdraw consent. If we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- The right to data portability. If you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed by automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details in Part 10.

It is important that your personal data is kept accurate and up to date. If any of the personal data we hold about you changes, please keep us informed for as long as we hold that data.

Further information about your rights can also be obtained from the Information Commissioner's Office (ICO) or your local Citizens Advice Bureau. If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the ICO. We would welcome the opportunity to resolve your concerns ourselves first, however, so please contact us using the details in Part 10 before doing so.

5. What Personal Data Do You Collect and How?

We collect personal data from or about you in a variety of ways:

- Information you supply to us directly, such as your name, job title, contact details (email, address, telephone number), information about your business or employer, experience, and qualifications. This includes when you register to receive our email updates, make an online enquiry, apply for a job, or establish a business relationship.
- Information received from other sources, including information we receive about you from third parties such as employment references and website analytics, for the purposes of assessing a job application and improving your experience when visiting Our Site respectively.

If you are applying for a job with us, please see our separate Job Applicant Privacy Policy below, which explains how we use the personal data you provide during the recruitment process.

Our Site collects certain information automatically, including your IP address, the type of browser you are using, and certain other technical data about your computer or device such as your operating system type or version and display resolution.

Our lawful bases for using this information are as follows. Where we use technical data for the secure and reliable operation of Our Site, we rely on our legitimate interests under Article 6(1)(f) of the UK GDPR. Where we set non-essential cookies (for example analytics cookies) or process the data they collect, we do so on the basis of your *consent* under Article 6(1)(a), which you provide through our cookie banner and can withdraw at any time. Where

you contact us or ask to receive updates, we rely on your consent under Article 6(1)(a). Where we manage a business relationship or contract, we rely on Article 6(1)(b) (performance of a contract) or Article 6(1)(f) (our legitimate interest in running our business). Please see the Cookies section below for more detail on cookies.

6. How Do You Use My Personal Data?

We use this information in a variety of ways, including:

- To provide you with information, products, or services that you request from us, or which we think may interest you;
- For the purposes of seeking qualified candidates for our recruitment activities;
- To manage and further our business relationships and contracts with our clients and suppliers, and to receive services from our suppliers;
- To produce management information and create reports to assist with future marketing; and
- For statistical, research, business, and product development purposes.

We only keep your information for as long as is necessary to fulfil the purposes for which we originally collected it. We also retain personal data for as long as we consider it necessary for the purposes of complying with our legal or contractual obligations, including those relating to our statutory and regulatory obligations and our financial, business, or tax affairs. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process it, and the applicable legal requirements.

7. How and Where Do You Store My Data?

We may store or transfer some or all of your personal data in countries outside the UK. These are known as “third countries”. Where we do so, we ensure that at least one of the following safeguards is in place, so that your personal data is treated as safely and securely as it would be within the UK and under the Data Protection Legislation:

- the third country is covered by UK adequacy regulations, which means it is deemed to provide an adequate level of protection for personal data;
- the transfer is governed by an International Data Transfer Agreement (IDTA), or the UK Addendum to the EU Standard Contractual Clauses; or
- for transfers to the United States, we rely on the UK Extension to the EU-US Data Privacy Framework where the recipient organisation is certified under it.

Where required, we also carry out a transfer risk assessment before transferring personal data outside the UK. For further information about adequacy regulations and international transfers, please refer to the Information Commissioner's Office.

Personal data security is essential to us. To protect your personal data we take the following measures, among others:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know, and ensuring that they are subject to duties of confidentiality;
- using appropriate technical and organisational measures, including encryption in transit and access controls; and
- maintaining procedures for dealing with any personal data breach (the accidental or unlawful destruction, loss, alteration, or unauthorised disclosure of, or access to, personal data), including notifying you and the Information Commissioner's Office where we are legally required to do so.

8. Do You Share My Personal Data?

We may contract with third parties for hosting, data storage, and related services. If any of your personal data is shared with a third party, we will take steps to ensure that it is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described in Part 7. Where a third party acts as our processor, we put a written contract in place that meets the requirements of Article 28 of the UK GDPR.

If any personal data is transferred outside the UK, we will take suitable steps to ensure it is protected, as explained in Part 7.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way or ways that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings, or are complying with legal obligations, a court order, or the instructions of a government authority.

9. How Can I Access My Personal Data?

If you want to know what personal data we hold about you, you can ask us for details of that personal data and for a copy of it. This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal address shown in Part 10. This is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is manifestly unfounded or excessive (for example, if you make repetitive requests), a fee may be charged to cover our administrative costs in responding, or we may refuse to act on the request.

We will respond to your subject access request within one month of receiving it. Normally we aim to provide a complete response, including a copy of your personal data, within that time. In some cases, particularly if your request is complex, more time may be required, up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

10. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Spencer John):

- **Email address:** privacy@prosyft.com
- **Telephone number:** +44 7908 265417
- **Postal address:** 7 Bell Yard, London, England, WC2A 2JR

11. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be posted on Our Site, and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date.

This Privacy Policy was last updated on 1 July 2026.

Cookies Policy

Our Site may place and access certain first-party cookies on your computer or device. First-party cookies are those placed directly by us and used only by us. We use cookies to facilitate and improve your experience of Our Site and to provide and improve our services. We have carefully chosen these cookies and have taken steps to ensure that your privacy and personal data are protected and respected at all times.

The following types of cookies may be used on Our Site:

- session cookies, which are temporary cookies that remain in the cookie file of your browser until you leave the Site; and
- persistent cookies, which remain in the cookie file of your browser for longer (how long depends on the lifetime of the specific cookie).

All cookies used by and on Our Site are used in accordance with the Privacy and Electronic Communications Regulations (PECR) and the Data Protection Legislation.

Certain cookies are essential for Our Site to function. These are classed as “strictly necessary”. We do not seek your consent to place strictly necessary cookies, but it is important that you are aware of them. All other cookies (for example analytics cookies) are non-essential, and we will only place them, or process the data they collect, with your consent. Before any non-essential cookies are placed, you will be shown a prompt requesting your consent. You may withdraw or change your consent at any time using the cookie controls on Our Site.

The cookies used on Our Site are set out in the table below:

Cookie name	Purpose	Type	Category / consent
session	Maintains your session while you use the Site.	Session	Strictly necessary. No consent required.
cookie_consent	Stores your cookie preferences so we do not ask again on every visit.	Persistent	Strictly necessary. No consent required.
analytics (if enabled)	Helps us understand how visitors use the Site so we can improve it.	Persistent	Non-essential. Set only with your consent.

Note: this table should be verified against a current cookie audit of Our Site and updated whenever cookies are added, changed, or removed.

In addition to the controls we provide, you can choose to enable or disable cookies in your internet browser. Most browsers also let you choose whether to disable all cookies or only third-party cookies. By default, most browsers accept cookies, but this can be changed. For further details, please consult the help menu in your browser or the documentation that came with your device.

You can delete cookies at any time. However, you may lose any information that enables you to access Our Site more quickly and efficiently, including login and personalisation settings. We recommend that you keep your browser and operating system up to date, and that you consult the guidance provided by your browser developer and device manufacturer if you are unsure about adjusting your privacy settings.

Job Applicant Privacy Policy

Data controller: ProSyft Ltd

1. Introduction

During the recruitment process, ProSyft Ltd (the Company) collects and processes personal data relating to job applicants. The Company is committed to being clear and transparent about how it collects and uses that data, and to meeting its data protection obligations.

2. What information does the Company collect and process?

The Company collects and processes a range of personal data about you. Personal data means any information about an individual from which the person can be identified. This includes:

- personal contact details, such as your name, title, address, and contact details, including email address and telephone number;
- details of your qualifications, skills, experience, and employment history, including start and end dates with previous employers;
- any role or roles for which you are applying or being considered, and your relevant personal interests, attributes, and career aspirations;
- information about your remuneration, including entitlement to benefits such as pensions;
- responses from any online assessments you complete during the application process;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

The Company collects this information in a variety of ways during the application and recruitment process. For example, data may be contained in application forms and CVs, obtained from identity documents such as your passport, and collected through interviews, online tests, and assessments.

In some cases, the Company collects personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, and information from criminal records checks permitted by law.

Data is stored in a range of different places, including on your application record, in the Company's HR management systems, and in other IT systems (including the Company's email system).

3. Why does the Company process personal data, and on what legal basis?

The Company processes your personal data for the following purposes and on the following legal bases under Article 6 of the UK GDPR:

- to take steps at your request prior to entering into a contract, and, if your application is successful, to enter into and perform an employment contract with you (Article 6(1)(b));
- to comply with our legal obligations, for example checking your entitlement to work in the UK before employment begins (Article 6(1)(c)); and
- for our legitimate interests in managing the recruitment process, assessing the suitability of candidates, keeping records of the process, and, where necessary, establishing, exercising, or defending legal claims (Article 6(1)(f)).

Where we process special category data (such as information about your health, ethnic origin, sexual orientation, or religion or belief) or criminal offence data, we rely on the following additional conditions:

- for equal opportunities monitoring, we rely on Article 9(2)(g) of the UK GDPR together with the condition for equality of opportunity or treatment in the Data Protection Act 2018 (Schedule 1, Part 1, paragraph 8);
- where we process health information to make reasonable adjustments to the recruitment process, we rely on Article 9(2)(b) together with the employment condition in the Data Protection Act 2018 (Schedule 1, Part 1, paragraph 1); and
- where we carry out criminal records checks that are permitted or required by law, we rely on the relevant condition in the Data Protection Act 2018 (Schedule 1) and process this data in accordance with our Appropriate Policy Document.

We maintain an Appropriate Policy Document, as required by the Data Protection Act 2018, covering our processing of special category and criminal offence data.

4. If you fail to provide personal information

You are under no obligation to provide the Company with data during the recruitment process. However, if you do not provide certain information when requested, the Company may not be able to process your application for employment properly, or at all. You are under no obligation to provide information for equal opportunities monitoring purposes, and there are no consequences for you if this information is not provided.

5. Automated decision-making

You will not be subject to decisions that have a significant effect on you based solely on automated processing, including profiling.

6. For how long do you keep data?

The Company will only hold your personal data for as long as is necessary to fulfil the purposes for which we collected it. If your application for employment is unsuccessful, the Company will hold your data on file for a period of one year after the end of the recruitment process. At the end of that period, your data is deleted or destroyed. If your application is successful, personal data gathered during the recruitment process will be transferred to your personnel file, and we will issue a new privacy notice setting out the periods for which your data will be held.

7. Who has access to data?

Your information will be shared internally for the purposes of the recruitment process, including with members of the senior leadership team and interviewers.

The Company will not share your data with third parties unless we make you an offer of employment. In those circumstances, the Company will share your data with third parties where required by law, and where it is necessary in order to administer the working relationship with you or where we have another legitimate interest in doing so. The Company will then share your data with former employers to obtain references about you.

We ordinarily collect, process, and store personal data in the UK. However, as we operate on a global basis, it may sometimes be necessary to transfer your information to recipients located outside the UK, including to our third-party service providers. Where we transfer your personal data outside the UK, we will ensure that an appropriate safeguard is in place, as described in Part 7 of our main Privacy Policy (for example UK adequacy regulations, the International Data Transfer Agreement or UK Addendum, or, for the United States, the UK Extension to the EU-US Data Privacy Framework).

8. How does the Company protect data?

The Company takes the security of your data seriously. We have internal policies and controls in place to prevent your data from being lost, accidentally destroyed, misused, or disclosed, and to ensure that it is not accessed except by our staff in the proper performance of their duties. However, since the internet is not a completely secure environment, we cannot guarantee the security of any information you transmit to us over it. We strongly advise you not to communicate confidential information through unencrypted email, instant messaging, or similar means.

9. Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request (a “data subject access request”);
- require the Company to correct incorrect or incomplete data;
- request erasure of your personal data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing;
- ask the Company to suspend the processing of your personal data for a period of time if the data is inaccurate or there is a dispute about its accuracy or the reason for processing it; and
- where processing is based on your consent, withdraw that consent at any time.

If you believe that the Company has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office.

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