

Privacy Policy

This privacy policy sets out how we, ProEx Outsourcing Ltd collect, store, and use information about you when you use or interact with our website: www.proexoutsourcing.com, and where we otherwise obtain or collect information about you.

This privacy policy is effective from 28/12/2023.

This privacy policy applies to our use of any and all data collected by us or provided by you.

This privacy policy applies only to the actions of ProEx Outsourcing Ltd. It does not extend to any websites, internet providers or platforms, applications or other technologies that can be accessed from our website or through accessing our website, including but not limited to, any links we may provide to social media websites.

ProEx Outsourcing Ltd has thoroughly reviewed all service providers and their privacy policies can be found in this policy under: 'Who we share data with and why.' These policies and their established security protocols support the comprehensive security and protection measures ProEx Outsourcing also employ.

For purposes of the applicable Data Protection Laws, ProEx Outsourcing Ltd is the "data controller". This means that ProEx Outsourcing Ltd determines the purposes for which, and the manner in which, your Data is processed.

The DPO in respect of our website is Lee Walker of ProEx Outsourcing Ltd, 3 East Hill Court, East Hill, Oxted, Surrey, RH8 9AD. You can contact DPO by writing to ProEx Outsourcing Ltd, 3 East Hill Court, East Hill, Oxted, Surrey, RH8 9AD or sending an email to info@proexoutsourcing.com.

If you have any questions about this Privacy Policy, please contact the DPO on: info@proexoutsourcing.com.

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Summary

This section summarises how we obtain, store, and use information about you. It is intended to provide a general overview only. **It is not complete and must be read in conjunction with the corresponding entire sections of this Privacy Policy.**

How we collect information about you

- **When you provide it to us:** By contacting us via the contact us page on our website or via call, email, or post).
- **From your use of our website:** Via the use of cookies and analytic software.
- **Information we collect:** Name, contact details, IP address, information from cookies, information about your computer or device (e.g., device and browser type), information about how you use our website (e.g., which pages you have viewed, the time you viewed them and what you clicked on, the geographical location from which you accessed our website (based on your IP address), company name or business name (if applicable) and your VAT number (if applicable).
- **How we use your information:** For administrative and business purposes, particularly to contact you in relation to your enquiry, to improve our business and website, to fulfil our contractual obligations, to analyse your use of our website, and in connection with our legal rights and obligations.
- **Disclosure of your information to third parties:** Only that which is necessary to run our business, to our service providers, to fulfil any contracts we enter into with you, where required by law or to enforce our own legal rights.
- **Selling your information to third parties:** We do not permit this and it breaches our commitment on data privacy and security.
- **How we secure your information:** Using appropriate technical and organisational measures such as storing your information on secure servers, encrypting transfers of data to, on or from our servers using Secure Sockets Layer (SSL) and encryption technologies, and only granting access to your information where absolutely necessary.
- **Use of cookies:** We use cookies and similar information-gathering technologies on our website including essential, functional, analytical, and targeting cookies. For more information, please visit our 'cookies policy.'
- **Transfers of your information outside the European economic area:** We will only transfer your information outside the European Economic Area if we are required to do so by law or in the essential processing of our business. Where we do so, we will ensure appropriate safeguards are in place.

Your rights in relation to your information

- To access your information and to receive information about its use.
- To have your information corrected.
- To have your information deleted.
- To restrict the use of your information.
- To receive your information in a portable format.
- To object to the use of your information.
- To withdraw your consent to the use of your information.
- Not to have significant decisions made about you based solely on automated processing of your information, including profiling.
- To complain to a supervisory authority.

Sensitive personal information

We do not collect what is commonly referred to as 'sensitive personal information' on our website. Please do not submit sensitive or personal information about you to us via this method. Communication of this data, its processing, use and storage when approved is limited to providing mortgage and protection administration services. For more information, please see the main section below entitled 'Sensitive Personal Information.' Authorised provisions of Sensitive personal information will only be permitted post contractual agreement with all relevant parties, and for predefined and agreed purposes.

Information we collect when you visit our website

We collect and use information from website visitors in accordance with this section and the section entitled 'Disclosure and additional uses of your information.'

Web server log information

We use third-party servers via our website providers: Yell.com and WIX. The website server automatically logs the IP address you use to access our website as well as other information about your visit such as the pages accessed, information requested, the date and time of the request, the source of your access to our website (e.g., the website or URL (link) which referred you to our website), your browser version and your operating system.

The server is located in the United Kingdom and data provided to us, ProEx Outsourcing Ltd, is non personalised, analytic data that us used to improve and conduct our business.

Use of website server log information for I.T security purposes

Our third-party server providers collect and store server logs to ensure network and IT security and so that the server and the website remain uncompromised. This includes analysing log files to help identify and prevent unauthorised access to our network, the distribution of malicious code, denial of services attacks and other cyber-attacks, by detecting unusual or suspicious activity. Unless we are investigating suspicious or potential criminal activity, we do not make, nor do we allow our website or server providers to make, any attempt to identify you from the information collected via server logs.

- **Legal basis for processing:** Compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation).
- **Legal basis for processing:** Our and our third-party's legitimate interest (Article 6(1)(f) of the General Data Protection Regulation).
- **Legal obligation:** We have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure.
- **Legitimate interests:** We and our third-party hosting provider have a legitimate interest in using your information for the purposes of ensuring network and information security.

Use of website server log information to analyse website use and improve our website

We use the information provided to us which has been collected by the website server logs to analyse how our website users interact with our website and its features. We analyse the number of visits and unique visitors we receive, the time and date of their visit, the location of the visit and the operating system and browser used for the visit. We use the data gathered from the analysis to improve our website and service provision. For example, we use the information gathered to change the information, content and structure of our website and individual pages according to what users are engaging most with and the duration of time spent on particular pages on our website.

- **Legal basis for processing:** Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest:** Improving our website for our website users and getting to know our website users' preferences so our website can better meet their needs and desires.

Cookies and similar technologies

Cookies are data files which are sent from a website to a browser to record information about users. Our website uses cookies and similar technologies, including essential functional analytical and targeting cookies. For further information on how we use cookies, please see our 'cookies policy.'

You can reject some or all of the cookies we use on or via our website by changing your browser settings. For further information about cookies, including how to change your browser settings, please visit www.allaboutcookies.org or see our 'cookies policy.'

Information we collect when you contact us

We collect and use information from individuals who contact us in accordance with this section and the section entitled 'Disclosure and additional uses of your information.'

Email

- **Data collection and use:** When you send an email to the email address displayed on our website, we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

Documents and data provided in emails directly to us that are provided to enable us at ProEx Outsourcing Ltd, to complete a contractual agreement will be utilised, stored, and deleted in accordance with our contractual, legal and business obligations. Further details on these and other policies can be found by writing, emailing, or calling the DPO for ProEx Outsourcing Ltd. Details for DPO contact are listed on page 1 of this privacy policy.

- **Legal basis for processing:** Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation) and to a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
- **Legitimate interest(s):** Responding to enquiries and messages we receive and keeping records of all correspondence for auditing and compliance adherence, and meeting our contractual agreements in relation to case or project management service provisions.
- **The reason why necessary to perform a contract:** Where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).
- **Transfer and storage of your information:** For business continuity and service provision, we store emails you send to us. We keep a record of all emails in line with UK data regulations and for the purposes conducting our business, oversight, and auditory purposes. Email data is stored on secure systems and deleted in accordance with our Data Retention policy which can be found by contacting the DPO for ProEx Outsourcing Ltd.

Data is also stored and transferred to ProEx Outsourcing Ltd in relation to website server log information, analysing email tab usage and website engagement from our website and server providers. Please see above for the sections: 'Use of website server log information for I.T security purposes' and, 'Use of website server log information to analyse website use and improve our website.' Please also see our 'Cookie Policy' below.

Contact form

- **Data collection and use:** When you contact us using our contact form, we collect your name, email address and telephone number. If you do not provide the mandatory information required by our contact form, you will not be able to submit the contact form and we will not receive your enquiry. We will also collect any other information you provide in that form for the purpose of addressing your enquiry.
- **Legal basis for processing:** Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest(s):** Responding to enquiries and messages we receive and keeping records of correspondence.
- **Legal basis for processing:** Necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
- **The reason why necessary to perform a contract:** Where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).
- **Transfer and storage of your information:** Contact made via our contact form will be communicated to us, ProEx Outsourcing Ltd, via email at our usual email address. For business continuity and service provision, we store emails you send to us. We keep a record of all emails in line with UK data regulations and for the purposes conducting our business, oversight, and auditory purposes. Email data is stored on secure systems and deleted in accordance with our Data Retention policy.

Data is also stored and transferred to ProEx Outsourcing Ltd in relation to website server log information, analysing contact form usage and website engagement from our website and server providers. Please see above for the sections: 'Use of website server log information for I.T security purposes' and, 'Use of website server log information to analyse website use and improve our website.' Please also see our 'Cookie Policy' below.

Phone

- **Data collection and use:** When you contact us by phone, we collect your phone number and any information provided to us during your conversation with us. We do not record phone calls. Information and data provided via phone is done so to enable us at ProEx Outsourcing Ltd, to complete and conduct our legitimate and contractual agreements and business. Data and information will be utilised, stored, and deleted in accordance with our contractual and legal obligations.

Data will also be supplied to ProEx Outsourcing in relation to call durations, quantity, type and numbers for analytic purposes, business development and maintenance. Data will be supplied by British Telecom.

- **Legal basis for processing:** Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest(s):** Responding to enquiries and messages we receive and keeping records of correspondence, and meeting our contractual agreements in relation to case or project management service provisions.
- **Legal basis for processing:** Necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
- **The reason why necessary to perform a contract:** Where your message or call relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).
- **Transfer and storage of your information:** Information about your call, such as your phone number and the date and time of your call, is processed by our third-party telephone service provider British Telecom, who are located in the UK. Information about your phone call will be stored by our third-party telephone service provider and routinely provided to us for analytic purposes in relation to service delivery. All data stored by ProEx Outsourcing Ltd is encrypted and secured physically and cryptographically.

Post

- **Data collection and use:** If you contact us by post, we will collect any information you provide to us in any postal communications you send us. Documents and data provided by post are done so to enable us at ProEx Outsourcing Ltd, to complete and conduct our legitimate business and meet our contractual agreements. Data and documents will be utilised, stored, and deleted in accordance with our contractual and legal obligations.
- **Legal Basis For Processing:** Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate Interest(s):** Responding to enquiries and messages we receive and keeping records of correspondence, and meeting our contractual agreements in relation to case or project management service provisions
- **Legal basis for processing:** Necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
- **The reason why necessary to perform a contract:** Where your post relates to us providing you with goods or services or taking steps at your request prior to providing

you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

- **Transfer and storage of your information:** For business continuity and service provision, we store post you send to us. Where necessary and in the conduct of our legitimate business or contractual agreements, the data is transferred into digital format and secured by encryption and other security measures used to secure our I.T systems. If applicable, we will return all original documents to the sender in the manner received (e.g.: if recorded or special delivery this will be matched). The sender will be notified prior to ProEx Outsourcing Ltd returning any documents or data via post. ProEx Outsourcing Ltd accept no responsibility for data or documents loss in transportation of said data if ProEx Outsourcing Ltd have met these requirements in relation to physical postal mail.

META/ Facebook/ Instagram

- **Data collection and use:** If you contact us via Meta/ Facebook/ Instagram, they will collect certain information related to the contact and this will be relayed back to us in the form of analytics periodically. Please review META/ Facebook/ Instagram's privacy policy to understand how they use your data and actions you can take to limit this. Details of how to access Meta/ Facebook/ Instagram's privacy policy are in this privacy policy under the section 'Who we share data with and why'. We will also collect information you provide to us in any communications with us.
- **Legal basis for processing:** Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest(s):** Responding to enquiries and messages we receive and keeping records of correspondence.
- **Legal basis for processing:** Necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
- **The reason why necessary to perform a contract:** Where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).
- **Transfer and storage of your information:** If you contact us by via Meta/ Facebook, we will collect any information you provide to us in any communications you send us. Data and information provided by this medium is done to enable us at ProEx Outsourcing Ltd, to complete and conduct our legitimate business and meet our contractual agreements. Data and documents will be utilised, stored, and deleted in accordance with our contractual and legal obligations. We keep a record of all social media communication in line with UK data regulations and for the purposes

conducting our business, oversight, and auditory purposes. Any stored data is kept on secure systems and deleted in accordance with our Data Retention policy.

Corp X/ Twitter

- **Data collection and use:** If you contact us via Corp X/ Twitter, they will collect certain information related to the contact and this will be relayed back to us in the form of analytics periodically. Please review Corp X/ Twitter's privacy policy to understand how they use your data and actions you can take to limit this. Details of how to access Corp X/ Twitter's privacy policy are in this privacy policy under the section 'Who we share data with and why'. We will also collect information you provide to us in any communications with us.
- **Legal basis for processing:** Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest(s):** Responding to enquiries and messages we receive and keeping records of correspondence.
- **Legal basis for processing:** Necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
- **The reason why necessary to perform a contract:** Where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).
- **Transfer and storage of your information:** If you contact us by via Corp X/ Twitter, we will collect any information you provide to us in any communications you send us. Data and information will be utilised, stored, and deleted in accordance with our contractual and legal obligations. We keep a record of all social media communication in line with UK data regulations and for the purposes conducting our business, oversight, and auditory purposes. Any stored data is kept on secure systems and deleted in accordance with our Data Retention policy.

LinkedIn

- **Data collection and use:** If you contact us via LinkedIn, they will collect certain information related to the contact and this will be relayed back to us in the form of analytics periodically. Please review LinkedIn's privacy policy to understand how they use your data and actions you can take to limit this. Details of how to access LinkedIn's privacy policy are in this privacy policy under the section 'Who we share data with and why'. We will also collect information you provide to us in any communications with us.

- **Legal basis for processing:** Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest(s):** Responding to enquiries and messages we receive and keeping records of correspondence.
- **Legal basis for processing:** Necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
- **The reason why necessary to perform a contract:** Where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).
- **Transfer and storage of your information:** If you contact us by via LinkedIn, we will collect any information you provide to us in any communications you send us, Data and information will be utilised, stored, and deleted in accordance with our contractual and legal obligations. We keep a record of all social media communication in line with UK data regulations and for the purposes conducting our business, oversight, and auditory purposes. Any stored data is kept on secure systems and deleted in accordance with our Data Retention policy.

Use of profiling for web analytics

Our web analytics service providers, Google Analytics, use and collects information such as your location (based on your IP address) and your behaviour (based on cookies) when you access our website (such as the pages you visit and what you click on). We will only be provided data for analytic purposes, attained from our cookies, if you have consented to us setting cookies on your computer in accordance with our cookies policy. Information collected about you, once collected is anonymised and stored on an aggregate basis.

- **Logic Involved:** By automatically analysing and categorising information such as the location (based on IP address) as well as the behaviour and devices of visitors to our website (using cookies), we are able to gain a better understanding of what our website visitors want (in terms of the content of our website and our products), how to improve our website and how to advertise and market our services to them.
- **Significance And Envisaged Consequences:** Cookies will be used to track and store information about your behaviour and device on our website unless you have opted out from receiving such cookies by downloading and installing the add-on for your web browser. The Google Analytics opt-out add-on is designed to be compatible with Chrome, Internet Explorer 11, Safari, Firefox and Opera. Please visit: <https://tools.google.com/dlpage/gaoptout> for this facility.

Disclosure and additional uses of your information

This section sets out the circumstances in which information about you is available to third parties and the additional purposes for which they use your information.

Google Analytics

- **Disclosure of your information to service providers:** We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business and who process your information for us on our behalf and for their own business concerns.
- **Disclosure of your information to other third parties:** You disclose your information to other third parties in specific circumstances, as set out below. Providing information to third parties such as Google Inc. Google collects information and uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service. Information is shared by Google to us on an aggregated and anonymised basis so we can improve our business and service.
- **Legal basis for processing:** Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest(s):** Google Analytics are a tool that assists with the ongoing management and performance of our online presence and enables us at ProEx Outsourcing Ltd, to gain a better understanding of what our website visitors want (in terms of the content of our website and our products), how to improve our website, presence and how to advertise and market our services more efficiently and successfully.
- **Opt out:** You can opt-out of Google Analytics by installing a browser add on. Details are above.
- **Transfer and storage of your information:** Information collected by Google Analytics is stored outside the European Economic Area on Google's servers in the United States of America. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Meta/ Facebook Analytics

- **Disclosure of your information to service providers:** We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business and who process your information for us on our behalf and for their own business concerns.

- **Disclosure of your information to other third parties:** You disclose your information to other third parties in specific circumstances. Meta/ Facebook collects information and uses this information, including (but not limited to) profile details, addresses, age, location, gender and interests and information from your social media page(s). This is done, with the aim of improving its own platform performance, audience targeting and revenue. Information is shared by META/ Facebook to us on an aggregated and anonymised basis so we can improve our business and service. To access Meta/ Facebook you will have accessed their platform and registered for their services. Please visit their own pages to limit how they utilise your data and protect your identity.
- **Legal basis for processing:** Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest(s):** Facebook analytics are a tool that assists with the ongoing management and performance of our social media platform presence and enables us at ProEx Outsourcing Ltd, to gain a better understanding of what our social media users want (in terms of the content of our platform and our products), how to improve our platform, presence and how to advertise and market our services more efficiently and successfully.
- **Opt out:** You can opt-out of META/ Facebook Analytics by visiting the privacy pages in your online profile.
- **Transfer and storage of your information:** Information collected by Meta/ Facebook Analytics is stored outside the European Economic Area on Meta/ Facebook's servers in the United States of America. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

LinkedIn Analytics

- **Disclosure of your information to service providers:** We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business and who process your information for us on our behalf and for their own business concerns.
- **Disclosure of your information to other third parties:** You disclose your information to other third parties in specific circumstances. LinkedIn collects information and uses this information, including (but not limited to) your profile details, occupation, employer, location, interests and information from your profile. This is done, with the aim of improving its own platform performance, audience targeting and revenue. Information is shared by LinkedIn to us on an aggregated and anonymised basis so we can improve our business and service. To access LinkedIn, you will have accessed their platform and registered for their services. Please visit their own pages to limit how they utilise your data and protect your identity.

- **Legal basis for processing:** Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest(s):** LinkedIn analytics are a tool that assists with the ongoing management and performance of our professional social media platform presence and enables us at ProEx Outsourcing Ltd, to gain a better understanding of what our business partners, business colleagues, industry regulators and supporters want (in terms of the content in our posts and our pages), how to improve our presence and how to advertise and market our services more efficiently and successfully.
- **Opt out:** You can opt-out of LinkedIn Analytics by visiting the privacy pages in your online profile.
- **Transfer and storage of your information:** Information collected by LinkedIn Analytics is stored outside the European Economic Area on LinkedIn's servers in the United States of America. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Third Parties

We only Share your information with third parties, which are either related to or associated with the running of our business, and where it is necessary for us to do so. These third parties include but is not limited to, our accountants, HMRC, mortgage and protection advisors and business partners such as: lenders, insurance companies and website hosting companies. Further information on each of these third parties is set out below.

- **Legal Basis For Processing:** Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate Interest:** Running and managing our business legally and efficiently.
- **Accountants:** We share information with our accountants for tax purposes. For example, we share invoices we issue and receive with our accountants for the purpose of completing tax returns and our end of year accounts.
- **Business Partners:** Business partners are businesses we work with which provide goods and services which are complementary to our own or which allow us to provide goods or services which we could not provide on our own. We share information with our business partners where you have requested services which they provide whether independently from, or in connection with or own services.
- **Advisers:** Data is shared in both directions to enable ProEx Outsourcing Ltd to meet its contractual agreements with the adviser and adhere to legal requirements related to the business being conducted. Data is only shared where contractual agreements with the adviser exist in relation to business, they have contracted with ProEx Outsourcing Ltd. Data not related to this service provision will not be shared in any

direction by either party. For further details and arrangements, please review additional company policies.

- **HMRC (including accountants), ISO and FCA:** As regulators of conduct and legal compliance, these third parties are engaged with on a necessary and legal basis. Data communicated will related to our business, record keeping and good conduct. Only data necessary to meet our obligations with these regulators will be shared and disclosed. Any disclosures will be done following the required security and protection protocols for data and individual protection.
- **Lenders and insurance companies:** As with 'Advisers,' data shared with these parties will only be done where contractual agreements with an adviser and their client exist in relation to agreed business and that ProEx Outsourcing Ltd have been instructed and authorised to complete and manage that contract in relation to the submission of an application and related processes for the adviser and their client. Data not related to this service provision will not be shared in any direction by either party. For further details, please review the additional company policies detailed at the end of this policy.
- **Website hosting providers (Contracts):** We will only share data and documents provided to us with Website hosting companies if you have contracted ProEx Outsourcing Ltd to act on your behalf in relation to the design and formation of a hosted website for your personal or business use. This provision is separate from the server and website providers relationship and sharing of data with ProEx Outsourcing Ltd in any other regard. It relates solely to the provision of website design and creation services offered by ProEx Outsourcing Ltd. This provision does not reduce, increase, or alter any other statements within this privacy policy in relation to any other contact, sharing or relationship with our own website and server providers, provisions, controls or agreements.

Disclosure and use of your information for legal reasons

If we suspect that criminal or potential criminal conduct has occurred, we will in certain circumstances need to contact an appropriate authority, such as the police or HMRC. This could be the case, for instance, if we suspect that a fraud or a cybercrime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

- **Legal basis for processing:** Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interests:** Preventing crime or suspected criminal activity (such as fraud) and in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights

may be contractual (where we have entered into a contract with you) or non-contractual.

- **Legal basis for processing:** Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest:** Enforcing our legal rights and taking steps to enforce our legal rights. In connection with a legal or potential legal dispute or proceedings, we may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process. Legal basis for processing: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest(s):** Resolving disputes and potential disputes.
- **For ongoing compliance:** with laws, regulations, and other legal requirements. We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order if we receive one or to the United Kingdom's Action Fraud department, the FCA or the UK police force in connection with suspected or potential money laundering matters.
- **Legal basis for processing:** Compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).
- **Legal obligation(s):** Legal obligations to disclose information which are part of the laws of England and Wales or if they have been integrated into the United Kingdom's legal framework.
- **Legal basis for processing:** Our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).
- **Legitimate interest:** Where the legal obligations are part of the laws of another country and have not been integrated into the United Kingdom's legal framework, we have a legitimate interest in complying with these obligations.

How long we retain your information

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

- **Retention periods** Server log information: we retain information on our server logs for One Year. Correspondence and enquiries: When you make an enquiry or correspond with us for any reason, whether by email or via our contact form or by phone, we will retain your information for as long as it takes to respond to and resolve your enquiry

- **Criteria for determining retention periods:** In any other circumstances, we will retain your information for no longer than necessary, considering the following:
 - The purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future),
 - Whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation),
 - Whether we have any legal basis to continue to process your information (such as your consent),
 - Any relevant agreed industry practices on how long information should be retained,

How we secure your information

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- Only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible.
- Using secure servers to store your information.
- Using industry leading encryption facilities to secure and store data.
- Verifying the identity of any individual who requests access to information prior to granting them access to information.
- Using Secure Sockets Layer (SSL) software to encrypt any information you submit to us via any forms on our website.
- Only transferring your information via closed system or encrypted data transfers.

Transmission of information to us by email

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk. We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

Transmission of information to us by Post

Transmission of information using the postal services are never entirely secure, and if you submit any information to us via post, you do so entirely at your own risk. We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means. We would always recommend that you notify us of any plans to send any data or documents via the postal services. We would also recommend that the special delivery or recorded delivery facilities that will be available, are used for your own security and peace of mind. We would also recommend using alternative methods of communication for this purpose. Our recommendations do not limit, reduce, or increase our stating position in relation to postal communication but should be taken as common sense advice and no more.

Transfers of your information outside the European economic area

Your information will be transferred and stored outside the European Economic Area (EEA) in the circumstances set out below. We will also transfer your information outside the EEA or to an international organisation in order to comply with legal obligations to which we are subject (compliance with a court order, for example). Where we are required to do so, we will ensure appropriate safeguards and protections are in place.

- **Google**

Information collected by Google Analytics (your IP address and actions you take in relation to our website) is transferred outside the EEA and stored on Google's servers.

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

- **Safeguard(s) used:** Google has self-certified its compliance with the UK, EU & U.S.A The EU-U.S. Privacy Shield 2.0 is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation.

- **Meta/ Facebook**

Information collected by META (your profile address and actions you take in relation to our website or social media pages on Facebook or Instagram) is transferred outside the EEA and stored on META's servers.

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

- **Safeguard(s) used:** Meta are currently in negotiations with the EU in relation to cross Atlantic data transfers and related security protocols and whether these can be stopped, reduced or data streams be kept within their areas of control. META currently uses the Privacy Shield 2.0 is an approved certification mechanism under

Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation.

- **X Corp/ Twitter**

Information collected by Corp X/ Twitter (your profile address and actions you take in relation to our website or social media page on X/ Twitter) is transferred outside the EEA and stored on META's servers.

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

- Safeguard(s) used: X Corp/Twitter has certified its compliance with the UK, EU & U.S.A The EU-U.S. Privacy Shield 2.0 is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation.

- **LinkedIn**

Information collected by LinkedIn (your profile address and actions you take in relation to our website or social media page on LinkedIn) is transferred outside the EEA and stored on LinkedIn's servers.

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

- Safeguard(s) used: X Corp/Twitter has certified its compliance with the UK, EU & U.S.A The EU-U.S. Privacy Shield 2.0 is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation.

Who we share data with and why

- **Yell.com – Web Host**

Yell Limited is a private limited company incorporated in (and subject to the laws of) England and Wales with registration number 4205228. Registered address is at 3 Forbury Place, Forbury Road, Reading, Berkshire RG1 3YL.

Yell Ltd is a digital marketing and online directory business in the United Kingdom. Yell.Com host and manage our website including our website security in conjunction with WIX.COM LTD & WIX.COM (UK) LTD.

For further information on Yell.Com, please visit: <https://www.yell.com> . For details on Yell.Com's privacy policy and how they use your data, please visit: <https://www.yell.com/legal/data-protection-privacy-policy>

- **Roundcube and Nextcloud – Email Providers via Yell.Com**

For further information on Roundcube and Nextcloud, please visit: <https://www.hello@roundcube.com>. All other details and contact for these parties should be directed via Yell.com and use the Yell.com contact details provided. <https://www.yell.com>.

- **WIX - Platform Provider**

WIX.COM LTD's Headquarters are in Israel, WIX.COM also has offices in the UK, Brazil, Canada, Germany, India, Ireland, Japan, Lithuania, Poland, the Netherlands, the United States, Ukraine, and Singapore.

WIX.COM (UK) LIMITED is a private limited company under WIX.COM LTD. WIX.Com Ltd is an Israeli software company publicly listed USA. WIX.COM (UK) Ltd: Company number 12576807 is Registered At -Mazars, 30 Old Bailey, London, United Kingdom, EC4M 7AU.

WIX.COM provides cloud-based web development services. WIX is the platform provider for Yell.com. It also protects, monitors and provides our platform.

For further information on WIX.COM, please visit: <https://www.wix.com>. For details on WIX.COM's privacy policy and how they use your data please visit: <https://www.wix.com/about/privacy> and for information related to WIX.COM security provisions for hosted websites and data management measures, please use the following link: <https://www.wix.com/website-security>.

- **BT Group PLC– Telecommunications**

The BT Group PLC is a public Limited Company registered in the UK at: 1 Braham Street, London, United Kingdom, E1 8EE. Company Registration Number 041990816.

The BT Group PLC provide telecommunication and WIFI services, our IP and email addresses.

For further information on the BT Group, please visit: <https://www.bt.com> For details on the BT Group's privacy policy and how they use your data, please visit: <https://www.bt.com/privacy-policy>

- **EE Limited**

EE is a UK based company registered at: 1 Braham Street, London E1 8EE. The company is registered in England and Wales under company number 02382161.

EE is a partner to the BT Group and offers network support to the BT Group in the event network failure.

For further information on the EE Limited, please visit: <https://ee.co.uk>

For details on EE Limited's privacy policy and how they use your data, please visit: <https://ee.co.uk/eeprivacycentre>

- **Microsoft Corporation**

The Microsoft Corporation is a USA based company operating worldwide. Microsoft's head office is based in Redmond, Washington, USA, with offices in the UK. The UK registered office is: MICROSOFT CAMPUS, THAMES VALLEY PARK, BERKSHIRE, READING, RG6 1WG. Registration Number: 01624297.

Microsoft provide our software along with our advanced software and hardware security. Azure provides our AD and additional cryptographic security facilities. Microsoft also facilitate cloud storage facilities.

For further information on the Microsoft Corporation, please visit: <https://www.microsoft.com/en-gb>

For details on the Microsoft's privacy policy and how they use your data, please visit: <https://privacy.microsoft.com/en-gb>

- **McAfee/ Trellix/ TrueKey**

McAfee/ Trellix is a USA based company operating worldwide. McAfee's head office is based in California, USA, at: 6220 America Center Drive, San Jose, CA 95002 USA. with offices in the UK. The UK registered office is: MICROSOFT CAMPUS, THAMES VALLEY PARK, BERKSHIRE, READING, RG6 1WG. Registration Number: 01624297. Its UK Office is based at: 280 Bishopsgate, London, EC2M 4RB and registered in the UK with the registration number: 10472868.

McAfee/ Trellix provide our software and advanced system security system. TrueKey supply password encryption services and are a subsidiary of McAfee.

For further information on McAfee, please visit: <https://www.mcafee.com>. For details on McAfee's privacy policy and how they use your data please visit: <https://www.mcafee.com/en-us/consumer-support/policy/legal.html>

- **Google**

Google is a USA based company operating worldwide. Google's head office is based at: 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, with offices in the UK. The UK registered office is: Belgrave House 76 Buckingham Palace Road London SW1W 9TQ United Kingdom. Registration Number: 03977902.

Google provide us with our search engine and have built in analytics. Use of the services enable us to conduct our legitimate business, conduct research and submit applications to lenders or insurance companies.

For further information on Google, please visit: <https://about.google> . For details on Google's privacy policy and how they use your data please visit: <https://www.facebook.com/privacy/policy>. For further details on Google Analytics, their use, function and data usage, please visit: <https://support.google.com/analytics#topic=1008008>

- **Meta/ Facebook**

Meta is a USA based company operating worldwide. Meta's is the holding company for Facebook. Meta's U.S.A head office is based at: 1 Hacker Way, Menlo Park, California, USA, with offices in the UK at: 10 The Southend, Ledbury, Herefordshire, HR8 2EY. Registration Number: 03983151 . The Facebook UK registered office is: 10 Brock Street, Regent's Place, London, England, NW1 3FG. Company Registration number: 06331310.

META/ Facebook provide us with analytics related to the social media platform performance and messenger facilities for users.

For further information on Meta and Facebook, please visit: <https://www.facebook.com/> . For details on Meta and facebook's privacy policy and how they use your data please visit: <https://policies.google.com/privacy>.

- **X Corp/ Twitter**

X Corp is a USA based company operating worldwide. X Corp was formerly known as 'Twitter'. X Corp's U.S.A head office is based at: 1355 Market Street, Ste, 900, San Fransico, California 94103. The X UK registered office is: Twitter UK Ltd, 1st Floor, 20 Air Street, London, W1B 5AN. Company Registration number: 07653064.

X Corp provide us with analytics related to the social media platform performance and messenger facilities for users.

For further information on Meta and Facebook, please visit: <https://www.twitter.com>. For details on X Corp/ Twitter's privacy policy and how they use your data please visit: [https://www.X Privacy Policy \(twitter.com\)](https://www.X Privacy Policy (twitter.com))

- **LinkedIn**

LinkedIn is a USA based company operating worldwide. LinkedIn's U.S.A head office is based at: 1000 West Maude, Sunnyvale, California, 94085. LinkedIn's UK registered office is: 123 Farringdon Road London - EC1R 3DA. Company Registration number: 06441873

LinkedIn provide us with analytics related to the social media platform performance and engagement of our visitors.

For further information on Meta and Facebook, please visit: <https://gb.linkedin.com>.
For details on LinkedIn’s privacy policy and how they use your data please visit: <https://www.linkedin.com/legal/privacy-policy>

- **UK authorised Lenders offering and providing mortgage products or UK authorised insurance companies offering and providing protection policies and products.**

All lenders and Insurance providers used in the provision of our services are UK registered and UK regulated organisations approved by the FCA and or PRU. Details of a lenders privacy policy and services can be found on the relevant lenders or insurers websites. Please use a search engine and type in the name of the companies whose data is required and most usually, scroll to the bottom of the header or contact us page for the link to ‘Privacy.’

Name of recipient	Why your personal data is shared	Location of processing	Safeguards used to protect personal data processed outside the EEA
Our suppliers and service providers (“Processors and Controllers”)			
Yell.com (“Yell”)	Yell facilitates, hosts, and manages our website and emails with security features and analytics. They use third parties in Roundcube and Nextcloud to provide the email services.	UK	N/A – processing is taking place within the EEA.
WIX.com	WIX is the platform provider for Yell.com and provides security to the platform and network.	HQ - USA (With UK registration and offices).	The European Commission has formally endorsed the EU-US Data Privacy Framework (DPF) (2023) in a move designed to support trans-Atlantic data flows. Data Shield 2.0. The Commission has said the DPF “introduces new binding safeguards to address all the concerns raised” by the CJEU. Additionally, a new “data bridge” would be an extension of the EU-US Data Privacy

Name of recipient	Why your personal data is shared	Location of processing	Safeguards used to protect personal data processed outside the EEA
			<p>Framework, dubbed 'Privacy Shield 2.0' promoting confidence and ease in data transference and security.</p> <p>Privacy Shield 2.0 is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation..</p>
BT Group PLC ("BT")	BT provides our digital telecommunications systems including WIFI, Emails and IP address.	UK	N/A – processing is taking place within the EEA.
EE Limited ("EE")	EE is a BT partner providing mobile data network support to BT ONLY in the event BT Systems fail temporarily.	UK	N/A – processing is taking place within the EEA.
Microsoft Corporation ("Microsoft")	Microsoft supply our IT systems, hardware and software security, Email, filing and data storage via cloud-based solutions, also supplies analytics related to service.	HQ - USA (With UK registration and offices).	<p>The European Commission has formally endorsed the EU-US Data Privacy Framework (DPF) (2023) in a move designed to support trans-Atlantic data flows. Data Shield 2.0.</p> <p>The Commission has said the DPF "introduces new binding safeguards to address all the concerns raised" by the CJEU. Additionally, a new "data bridge" would be an extension of the EU-US Data Privacy Framework, dubbed 'Privacy Shield 2.0' promoting</p>

Name of recipient	Why your personal data is shared	Location of processing	Safeguards used to protect personal data processed outside the EEA
			<p>confidence and ease in data transference and security. Privacy Shield 2.0 is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation..</p>
<p>McAfee/ Trellix/ TrueKey "McAfee"</p>	<p>Providing hardware and software security for our systems and data.</p>	<p>USA</p>	<p>The European Commission has formally endorsed the EU-US Data Privacy Framework (DPF) (2023) in a move designed to support trans-Atlantic data flows. Data Shield 2.0. The Commission has said the DPF "introduces new binding safeguards to address all the concerns raised" by the CJEU. Additionally, a new "data bridge" would be an extension of the EU-US Data Privacy Framework, dubbed 'Privacy Shield 2.0 promoting confidence and ease in data transference and security. Privacy Shield 2.0 is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation.</p>
<p>Google Inc / Azure "Google"</p>	<p>Supply our search engine and is used for research and to the internet. Also supplies advance encryption</p>	<p>USA</p>	<p>The European Commission has formally endorsed the EU-US Data Privacy Framework (DPF) (2023) in a move designed to</p>

Name of recipient	Why your personal data is shared	Location of processing	Safeguards used to protect personal data processed outside the EEA
	<p>and cryptographic security, also supplies analytics related to service.</p>		<p>support trans-Atlantic data flows. Data Shield 2.0. The Commission has said the DPF “introduces new binding safeguards to address all the concerns raised” by the CJEU. Additionally, a new “data bridge” would be an extension of the EU-US Data Privacy Framework, dubbed ‘Privacy Shield 2.0 promoting confidence and ease in data transference and security. Privacy Shield 2.0 is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation.</p>
<p>Meta / Facebook / Instagram “Meta”</p>	<p>Supply a communication and engagement platform with messaging facilities enabling visitors to access our website from an additional source, also supplies analytics related to service.</p>	<p>USA</p>	<p>The European Commission has formally endorsed the EU-US Data Privacy Framework (DPF) (2023) in a move designed to support trans-Atlantic data flows. Data Shield 2.0. The Commission has said the DPF “introduces new binding safeguards to address all the concerns raised” by the CJEU. Additionally, a new “data bridge” would be an extension of the EU-US Data Privacy Framework, dubbed ‘Privacy Shield 2.0 promoting confidence and ease in data transference and security. Privacy Shield 2.0 is an approved certification mechanism under Article 42 of</p>

Name of recipient	Why your personal data is shared	Location of processing	Safeguards used to protect personal data processed outside the EEA
			the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation.
Corp X/ Twitter "X"	Supply a communication and engagement platform with messaging facilities enabling visitors to access our website from an additional source, also supplies analytics related to service.	USA	The European Commission has formally endorsed the EU-US Data Privacy Framework (DPF) (2023) in a move designed to support trans-Atlantic data flows. Data Shield 2.0. The Commission has said the DPF "introduces new binding safeguards to address all the concerns raised" by the CJEU. Additionally, a new "data bridge" would be an extension of the EU-US Data Privacy Framework, dubbed 'Privacy Shield 2.0 promoting confidence and ease in data transference and security. Privacy Shield 2.0 is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation.
LinkedIn "LinkedIn"	Supply a professional communication and engagement platform with messaging facilities enabling visitors to access our website from an additional source, also supplies analytics related to service.	USA	The European Commission has formally endorsed the EU-US Data Privacy Framework (DPF) (2023) in a move designed to support trans-Atlantic data flows. Data Shield 2.0. The Commission has said the DPF "introduces new binding safeguards to address all the concerns raised" by the CJEU.

Name of recipient	Why your personal data is shared	Location of processing	Safeguards used to protect personal data processed outside the EEA
			<p>Additionally, a new “data bridge” would be an extension of the EU-US Data Privacy Framework, dubbed ‘Privacy Shield 2.0’ promoting confidence and ease in data transference and security. Privacy Shield 2.0 is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation.</p>
All of Market, UK Mortgage Providers	Using the online portals to enable Mortgage application submission.	UK	N/A – processing is taking place within the EEA. Privacy Shield.
All of Market, UK Insurance Providers	Using the online portals to enable Protection application submission.	UK	N/A – processing is taking place within the EEA. Privacy Shield.

Your Rights In Relation To Your Information

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to our DPO: Lee Walker of ProEx Outsourcing Ltd, at, 3 East Hill Court, East Hill, Oxted, Surrey, RH8 9AD or sending an email to info@proexoutsourcing.com

- **To Request Access To Your Information** and information related to our use and processing of your information.
- **To Request The Correction Or Deletion** of your information.
- **To Request That We Restrict Our Use** of your information.
- **To Receive Information Which You Have Provided To Us In A Structured, Commonly Used And Machine-Readable Format** (e.g., a PDF) and the right to have

that information transferred to another data controller (including a third-party data controller).

- **To Object To The Processing Of Your Information For Certain Purposes** for further information, see the section below entitled Your right to object to the processing of your information for certain purposes.
- **To Withdraw Your Consent To Our Use Of Your Information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.

Right To Complain

In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority of an alleged infringement of the General Data Protection Regulation. For the purposes of the UK, the supervisory authority is the Information Commissioner's Office (ICO). The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the ICO's website. You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation.

Verifying Your Identity Where You Request Access To Your Information.

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so. These measures are designed to protect your information and reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

- **How We Verify Your Identity.** Where we possess appropriate information about you on file, we will attempt to verify your identity using that information. If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information. We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

Your Right To Object To The Processing Of Your Information For Certain Purposes

You have the following rights in relation to your information, which you may exercise by writing to Lee Walker of ProEx Outsourcing Ltd, 3 East Hill Court, East Hill, Oxted, Surrey, RH8 9AD or sending an email to info@proexoutsourcing.com

- **To Object:** to us using or processing your information where we use or process it in order to carry out a task in the public interest or for **our legitimate interests**, including 'profiling' (i.e., analysing or predicting your behaviour based on your information and engagement with us).
- **To Object:** to us using or processing your information for **direct marketing purposes** (including any profiling we engage in that is related to such direct marketing).

Marketing Opt Out

You may exercise your right to object to us using or processing your information for direct marketing purposes by:

- Sending an email to info@proexoutsourcing.com, asking that we stop sending you marketing communications or by including the words "OPT-OUT."

For more information on how to object to our use of information collected from cookies and similar technologies, please see the section titled 'How to accept or reject cookies' in our 'cookies policy.'

Sensitive Personal Information

'Sensitive personal information' is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person's sex life or sexual orientation. We do not routinely collect sensitive personal information from individuals, and you must not submit sensitive personal information to us unless specifically requested and in accordance with a contract provision (Such as a protection application). Data and information requested will be limited to that which is required to perform the agreed contract and destroyed once used. The Data Controller will have attained and provided evidence of authority for usage prior to disclosure and usage.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information as instructed and for the purpose of deleting it.

Changes To Our Privacy Policy

We update and amend our Privacy Policy on occasions.

- **Minor Changes To Our Privacy Policy:** Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

- **Major Changes To Our Privacy Policy:** or the purposes for which we process your information, where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website. We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose. On ALL occasions, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it. New contracts to reflect the new condition or process, and consent will also be required before and changes are implemented.

Children's Privacy

Because we care about the safety and privacy of children online, we comply with the Children's Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18. It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this and as soon as we verify the information, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to info@proexoutsourcing.com

Do Not Track Disclosures

"Do Not Track" is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to websites requesting that they do not track the user.

Copyright, Credit And Logo

This Privacy Policy is based on a General Data Protection Regulation (Regulation (EU) 2016/769) (GDPR).

Social Media And Messaging

We send messages from social media if you have enquired and/or have an active agreement with us. The same storage and disposal time frames and procedures are applicable.

Company Conduct Policies

Additional ProEx Outsourcing Ltd Company Policies can be requested by contacting: The DPO in respect of our company. You can contact our DPO, Lee Walker by writing to ProEx Outsourcing Ltd, 3 East Hill Court, East Hill, Oxted, Surrey, RH8 9AD or sending an email to info@proexoutsourcing.com making your request.

Justification and identification are required prior to consent and access being granted to wider policies. This is to protect our own rights, security and data.

Policies available upon request Include:

- Privacy Policy
- Cookie Policy
- Data Security Policy
- Cyber Security Policy
- Encryption & Cryptographic Policy
- Data Retention Policy
- Breach Response and Notification Policy
- Business Continuity & Disaster Recovery Policy
- User Access Policy
- Payment Methods & Structure Policy