

Data Privacy and Cookie Policy



Privacy Policy and GDPR Statement

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1. Introduction

- 1.1 Change Associates Ltd [henceforth 'We'] is committed to safeguarding the privacy of our website visitors, our clients, associates and suppliers; in this policy we explain how we will handle your personal data.
- 1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.
- 1.3 When you submit details via our website or do business with us you will be asked for information which affects how we will process your personal data. You can specify whether you would like to receive direct marketing communications. You can opt out of receiving marketing communications with us at any point by clicking the unsubscribe link in our marketing emails or by emailing us directly at info@changeassociates.com

2. Credit

- 2.1 This document was created using a template from Docular:
(<https://seqlegal.com/free-legal-documents/privacy-policy>).

3. The personal data that we collect

- 3.1 In this Section 3 we have set out the general categories of personal data that we may process.
- 3.2 We may process data enabling us to get in touch with you ("**contact data**"). The contact data may include your name and email address. The source of the contact data is you.
- 3.3 We may process your account data ("**account data**"). Account data may include your name and email address. The source of the account data is you or your employer.
- 3.4 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics, a widely used analytics platform.
- 3.5 In the case of Associates, we may process your information included in your personal profile ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, your professional biography and CV, your skills and experience, availability and associated information required to match you with opportunities. The source of the profile data is you and providing this information, we rely on **legitimate interest** as the legal basis for using your data to match skills to client opportunities, which is core to our business model. You may object to this processing at any time.
- 3.6 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include contact details, invoicing and account details, and specifications. The source of the service data is you or your employer.

- 3.7 We may process information contained in or relating to any communication that you send to us or that we send to you ("**communication data**"). The communication data may include the communication content and metadata associated with the communication.
- 3.8 We may process information contained in any enquiry you submit to us regarding research reports, products and/or services ("**enquiry data**").
- 3.9 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**").
- 3.10 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms.
- 3.11 Please do not supply any other person's personal data to us, unless we prompt you to do so.

4.0 Purposes of processing and legal bases

- 4.1 In this Section 4, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 4.2 **Operations** - We may process your personal data for the purposes of operating our website, providing our services, record-keeping, generating invoices, bills and other payment-related documentation, and credit control. The legal basis for this processing is our legitimate interests, namely the proper administration of our website, services and business, or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 4.3 **Relationships and communications** - We may process contact data, account data, and/or communication data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, social media, SMS and/or telephone, providing support services and complaint handling. The legal basis for this processing is our legitimate interests, namely communications with our website visitors, clients, associates and suppliers, the maintenance of relationships, and the proper administration of our website, services and business.
- 4.5 **Direct marketing** - We may process contact data, account data, enquiry data, notification data and/or usage data for the purposes of creating, targeting and sending direct marketing communications by email, social media, SMS and/or making contact by telephone for marketing-related purposes. The legal basis for this processing is consent.
- 4.6 **Research and analysis** - We may process usage data and/or enquiry data for the purposes of researching and analysing the use of our website and services, as well as researching and analysing other interactions with our business, including internal analysis across The Change Associates Group to improve operational efficiency, sales planning, and understanding of client engagement. The legal basis for this processing is our legitimate interests under Article 6(1)(f), namely monitoring, supporting, improving and securing our website, services and business generally.

- 4.7 **Record keeping** - We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.
- 4.8 **Security** - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our website, services and business, and the protection of others.
- 4.9 **Legal claims** - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 4.10 **Legal compliance and vital interests** - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

5. Providing your personal data to others

- 5.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.
- 5.2 In the case of **Associates** we may disclose profile data to clients without notice for the purposes of matching your skills to relevant opportunities and securing work for the business and for you. By providing this information, we rely on **legitimate interest** as the legal basis for using your data to match skills to client opportunities, which is core to our business model. You may object to this processing at any time.
- 5.3 Financial transactions are recorded on Xero. We will hold transaction data with our services provider only to the extent necessary for the purposes of processing invoices, payments and refunds, and dealing with queries and complaints relating to such payments and refunds. You can find information about the our financial systems provider's privacy policies and practices <https://www.xero.com/uk/gdpr>
- 5.4 In addition to the specific disclosures of personal data set out in this Section 5, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 5.5 Change Associates Ltd is part of The Change Associates Group, which includes Preos Ltd. As part of shared operations, both companies now use a single CRM system for client relationship management. This means authorised staff from each company may have visibility of client contact data and sales records held by the other. This access is restricted to business

contact details and sales engagement notes and is used solely for internal planning, reporting, and analysis. Each company retains responsibility for communicating only with its own clients and contacts. No cross-marketing activity takes place.

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

6. International transfers of your personal data

- 6.1 In this Section 6, we provide information about the circumstances in which your personal data may be transferred to a third country under UK data and/or EU data protection law.
- 6.2 We may transfer your personal data from the European Economic Area (EEA) to the UK and process that personal data in the UK for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which the UK is not treated as a third country under EU data protection law or benefits from an adequacy decision under EU data protection law and we may transfer your personal data from the UK to the EEA and process that personal data in the EEA for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which EEA states are not treated as third countries under UK data protection law or benefit from adequacy regulations under UK data protection law. Transfers will be protected by appropriate safeguards, which will include password protected files and secure email transfer.

7. Retaining and deleting personal data

- 7.1 This Section 7 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 7.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.3 We will retain your personal data as follows:
- a. contact data will be retained for a maximum period of two years following the date of the most recent contact between you and us;
 - b. account data will be retained for a maximum period of two years following the date of closure of the relevant account;
 - c. usage data will be retained indefinitely for the purpose of monitoring the historical performance of our website, however personal data beyond the ISP will not be linked to this data;
 - d. profile data will be deleted on request or within two years of your last communication with us;
 - e. service data will be retained for a maximum period of two years after our last transaction with you;
 - f. communication data will be retained for a maximum period of 2 years following the date of the communication in question;

- g. enquiry data will be deleted on request or maintained for a maximum period of 2 years following the date of collection;
- h. notification data will be retained for a maximum period of two years following our last contact with you;

7.4 Notwithstanding the other provisions of this Section 7, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or to protect your vital interests or the vital interests of another natural person.

8. Your rights

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

8.2 Your principal rights under data protection law are:

- (a) **the right to access** - you can ask for copies of your personal data;
- (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- (c) **the right to erasure** - you can ask us to erase your personal data;
- (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
- (e) **the right to object to processing** - you can object to the processing of your personal data;
- (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
- (g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and
- (h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

8.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting [https://edpb.europa.eu/our-work-tools/general-guidance/gdpr-guidelines-recommendations-best-practices_en] and [<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>].

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

9. About cookies

9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

- 9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 9.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

10. Cookies that we use

10.1 We use cookies for the following purposes:

- (a) **authentication and status** - we use cookies to identify you when you visit our website, as you navigate our website, and to help us determine if you are logged into our website;
- (b) **analysis** - we use cookies to help us to analyse the use and performance of our website and services; and
- (c) **cookie consent** - we use cookies to store your preferences in relation to the use of cookies more generally

11. Cookies used by our service providers

- 11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 11.2 We use Google Analytics, which gathers information about the use of our website and uses cookies for this purpose. We use the information gathered by Google Analytics to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://policies.google.com/technologies/partner-sites> and you can review Google's privacy policy at <https://policies.google.com/privacy>.

12. Managing cookies

- 12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser and from version to version. You can obtain up-to-date information about managing cookies via these links:
- (a) <https://support.google.com/chrome/answer/95647> (Chrome);
 - (b) <https://support.mozilla.org/en-US/products/firefox/privacy-and-security> (Firefox);
 - (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
 - (d) <https://support.apple.com/en-gb/guide/safari/welcome/mac> (Safari); and
 - (e) <https://support.microsoft.com/en-gb/windows/microsoft-edge-browsing-data-and-privacy-bb8174ba-9d73-dcf2-9b4a-c582b4e640dd> (Edge).
- 12.2 Blocking all cookies will have a negative impact upon the usability of many websites.
- 12.3 If you block cookies, you will not be able to use all the features on our website.

13. Amendments

- 13.1 We may update this policy from time to time by publishing a new version on our website.
- 13.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

14. Our details

- 14.1 This website is owned and operated by Change Associates Limited.
- 14.2 We are registered in England and Wales under registration number 05372001, and our registered office is at 18B New Quebec Street, London W1H 7RX, UK.
- 14.3 Our principal place of business is at 18B New Quebec Street, London W1H 7RX, UK.
- 14.4 You can contact us:
 - (a) by post, to the postal address given above;
 - (b) using our website contact form;
 - (c) by telephone, on the contact number published on our website; or
 - (d) by email, using the email address published on our website.