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## PRIVACY POLICY

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Future Paths Consulting Ltd. (“**we/us/our**”), is committed to safeguarding the privacy of all private individuals (“**you/your**”) who are or are associated with entities who are our customers/clients or users who visit the website <https://www.futurepathsconsulting.co.uk> and/or use any of our applications (collectively the “**Website**”), procure our services, provide goods or services to us or apply to provide goods or services to us.

### **What does this policy cover?**

This privacy statement (“Privacy Policy”) sets out our personal information collection and sharing practices for such information and is intended to inform you of the ways in which we collect personal information, the uses of that personal information and the ways in which we will share any personal information you choose to provide to us.

Further notices highlighting certain uses we wish to make of your personal information together with the ability to opt in or out of selected uses may also be provided when we collect personal information from you.

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

### **Who are we?**

We are a private company limited by shares incorporated in England and Wales with company registration number 15282215 and with its registered address at 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ.

Our email address for any queries related to this Privacy Policy is [futurepathsconsulting@outlook.com](mailto:futurepathsconsulting@outlook.com).

We are data controllers for personal information. We are registered with the Data Commissioner’s Office under number ZB636212.

### **What about links to other websites?**

The Website 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.

### **What is Data Protection Regulation?**

Data Protection Regulation refers to all applicable legislation in force from time to time in the United Kingdom applicable to data protection and privacy including, but not limited to, the UK GDPR; the Data Protection Act 2018 (and regulations made thereunder); and the Privacy and Electronic Communications Regulations 2003 as amended. The UK GDPR refers to Regulation (EU) 2016/679 General Data Protection Regulation as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and amended by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019. The Data Protection Regulation allows companies to process personal information only when the processing is permitted by the specific “legal grounds” set out in law.

### **What is personal data?**

Personal data is defined by 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. Personal data 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.

## **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 clause 2.
- The right to access the personal data we hold about you. Clause 13 will tell you how to do this.
- The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in clause 2 to find out more.
- The right to be forgotten, i.e., the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in clause 2 to find out more.
- The right to restrict (i.e., 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. This means that, 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. This means that, 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 using 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.

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g., the prevention or detection of crime) and our interests (e.g., the maintenance of legal privilege, regulation relating to book keeping, etc.). Your exercise of these rights can also lead to us not being able to continue providing services to you. If you exercise any of these rights, we will check your entitlement and respond as soon as possible and in most cases within a month.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in clause 2.

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 as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office 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 Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so if possible, please contact us first, using the details in clause 2.

## **What Data Do You Collect and How?**

Depending upon whether you use the Website and/or our services or whether you provide goods or services to us or apply to provide goods or services to us we may collect and hold some or all of the personal data set out below, using the methods also set out below. We do not collect any 'special category' or 'sensitive' personal data.

We will collect and process all or some of the following personal information about you:

Information you provide to us	Personal information that you provide to us, including but not limited to your name, email address, and other contact details, your LinkedIn URL, education and employment details including your visa status. We collect such information when you are using our contact form or any subscription forms on the Website or when you are procuring services from us such as CV / Cover Letter Reviews, Practice Interviews, career research or digital products, or if you are providing goods or services to us. If you choose to apply for a job with us and submit a job application, we will collect information that you submit to us;
Our correspondence	If you contact us, we will typically keep a record of that correspondence;
Survey information	If we ask you to complete surveys that we use for research purposes, we shall collect the information provided in the completed survey;
Website and communication usage	Details of your visits to the Website and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access.

### How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. In the following, we will describe how we may use your personal data, and our lawful bases for doing so:

To communicate effectively with you and conduct our business	To conduct our business, including responding to your queries, to provide services to you or to otherwise communicate with you, or to carry out our obligations arising from any agreements entered into between you and us, which in some circumstances may include passing your data to third parties such as agents or contractors or to our advisors (e.g., legal, financial, business, or other advisors).
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**Use justification:** contract performance and legitimate interests (to enable us to perform our obligations and provide our services to you)

To provide you with marketing materials	To provide you with updates and offers, where you have chosen to receive these. We may also use your information where you have permitted us for marketing our own and our selected business partners' products and services to you by post, email, SMS, phone, and fax and, where required by law, we will ask for your consent at the time we collect your data to conduct any of these types of marketing. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt out by contacting us.
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**Use justification:** consent and legitimate interest (to keep you updated with news in relation to our products and services)

For research and development purposes	To analyse your personal information in order to better understand your and our other clients' and partners' services and marketing requirements and to better understand our business and develop our products and services.
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**Use justification:** legitimate interests (to allow us to improve our services)

To monitor certain activities	To monitor queries and transactions to ensure service quality, and compliance with procedures and to combat fraud.
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**Use justifications:** legal obligations, legal claims and legitimate interests (to ensure the quality and legality of our services)

To inform you of changes	To notify you about changes to our services and products.
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**Use justification:** legitimate interests (to notify you about changes to our service)

To ensure website content is relevant	To ensure that content from the Website is presented in the most effective manner for you and for your device, which may include passing your data to business partners, suppliers and/or service providers.
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**Use justification:** contract performance, legitimate interests (to allow us to provide you with the content and services on the websites)

To reorganise or make changes to our business	If we: (i) are subject to negotiations for the sale of our business or part thereof to a third party; (ii) are sold to a third party; or (iii) undergo a re-organisation, we may need to transfer some or all of your personal information to the relevant third party (or its advisors) as part of any due diligence process for the purpose of analysing any proposed sale or re-organisation. We may also need to transfer your personal information to that re-organised entity or third party after the sale or reorganisation for them to use for the same purposes as set out in this policy.
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**Use justification:** legitimate interests (in order to allow us to change our business)

In connection with legal or regulatory obligations	We process your personal information to comply with our regulatory requirements or as part of dialogue with our regulators as applicable which may include disclosing your personal information to third parties, the court service, regulators and/or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.
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**Use justification:** legal obligations, legal claims, legitimate interests (to cooperate with law enforcement and regulatory authorities)

*These are the principal legal grounds that justify our use of your information:*

<i>Consent</i>	<i>Where you have consented to our use of your information (you will have been presented with an electronic consent form in relation to any such use and may withdraw your consent by the same means through which we are interacting with you or by email to us.</i>
<i>Contract performance</i>	<i>Where your information is necessary to enter into or perform our contract with you.</i>
<i>Legal obligation</i>	<i>Where we need to use your information to comply with our legal obligations.</i>
<i>Legitimate interests</i>	<i>Where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.</i>
<i>Legal claims</i>	<i>Where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party.</i>

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in clause 2.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

### **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary considering the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- **Identity information** *such as name, title, date of birth*
  - 3 months for marketing-related information, e.g., where you have requested an offer from us; 3 years after our last contact or termination of a business relationship for customer information.
- **Contact information** *such as email address, address, and telephone number.*
  - 3 months for marketing-related information, e.g., where you have requested an offer from us; 3 years after our last contact or termination of a business relationship for customer information.
- **Business information** *such as business name, job title, profession.*
  - 3 months for marketing-related information, e.g., where you have requested an offer from us; 3 years after our last contact or termination of a business relationship for customer information.
- **CV information** *such as education, employment details, nationality, visa status.*
  - 3 years after our last contact or termination of a business relationship for customer information.
- **Profile information** *such as username, password, preferences, and interests.*
  - 3 months for marketing-related information, e.g., where you have requested an offer from us; 3 years after our last contact or termination of a business relationship for customer information.
- **Payment information** *such as card details.*
  - 5 years after the last payment transaction.
- **Technical information** *such as IP address, browser type and version, and operating system.*
  - 3 months.

### **How and Where Do You Store or Transfer My Personal Data?**

We may store some or all of your personal data in countries outside of the UK. These are known as “third countries”. We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We ensure that your personal data is protected under binding corporate rules. Binding corporate rules are a set of common rules which all our group companies are required to follow when processing personal data.

We may store or transfer personal data in or to countries that are deemed to provide an adequate level of protection for personal data under UK adequacy decisions and adequacy regulations.

We may use specific approved contracts which ensure the same levels of personal data protection that apply under the Data Protection Legislation.

For further information, please refer to the [Information Commissioner's Office](#).

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- 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;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

### **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

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(s) 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 complying with legal obligations, a court order, or the instructions of a government authority.

We may sometimes contract with third parties to supply certain products or services for us.

If any of your personal data is shared with a third party, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in clause 9.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in clause 9.

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(s) 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 complying with legal obligations, a court order, or the instructions of a government authority.

### **How Can I Control My Personal Data?**

In addition to your rights under the Data Protection Legislation, set out in clause 6, when you submit personal data via the Website or otherwise, you may be given options to restrict our use of your personal data. In particular, we aim to give you

strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails.

### **Can I Withhold Information?**

You may be able to access certain areas of the Website and/or receive certain services from us without providing any personal data at all. However, to use all features and functions available on the Website and/or interact with us or receive services from us you may be required to submit or allow for the collection of certain data.

### **How Can I Access My Personal Data?**

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

All subject access requests should be made in writing and sent to the postal address shown in clause 2. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible. Please note that for security reasons only the relevant data subject, i.e., normally yourself can submit such subject access requests regarding your own personal data. The one requesting data access must be able to identify him-/herself within the reasonable standard set by us.

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.

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, however, particularly if your request is more 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.

### **How Do You Use Cookies?**

“Cookies” refers to small text files placed on your computer or device by a website when you visit certain parts of such a website and/or when you use certain features of a website.

The Website may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of the Website and to provide and improve our services.

By using the Website, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. For more details, please refer to the table below. These Cookies are not integral to the functioning of the Website and your use and experience of the Website will not be impaired by refusing consent to them.

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible user experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

Certain features of the Website depend on Cookies to function. Such Cookies are “strictly necessary”. These Cookies are shown in the table below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be

aware that the Website may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

The following first-party Cookies may be placed on your computer or device:

Name of Cookie	Purpose	Strictly Necessary
ssr-caching	The ssr-caching cookie is set by WIX and indicates how a site was rendered.	yes
hs	Wix platform sets this cookie for security purposes.	yes
svSession	Wix platform sets this cookie to identify unique visitors and track a visitor's session on a site.	yes
XSRF-TOKEN	Wix set this cookie for security purposes.	yes
bSession	Wix set this cookie in context with load balancing to improve user experience.	yes

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

You can choose to delete Cookies on your computer or device at any time, however, you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

### 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 immediately posted on the Website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of the Website following the alterations. We recommend that you check this page regularly to keep up-to-date.

This Privacy Policy was last updated on 1<sup>st</sup> March 2024.