Privacy notice

At ela8 Limited ('ela8') we respect everyone's privacy and are committed to protecting all personal data we collect, process and store. The purpose of this notice is to inform individuals and organisations how we look after personal data collected during the course of our business, covering information relating to our client's employees as well as personal information collected about individuals with whom we interact (such as prospective employees, prospective corporate customer contacts, our corporate customer contacts and in relation to our suppliers). It will also tell individuals on whom we hold personal data about their personal privacy rights and how the law protects them.

1 Important information

Purpose of this Privacy Notice

This privacy notice provides information on how ela8 collects and processes personal data through the course of our business activities. It is important that this notice is read together with any other privacy notice, contractual terms or fair processing notice we may provide on specific occasions when we are collecting or processing personal data.

Data Controller and Data Processor status

ela8 acts as the data controller in relation to individuals on whom we collect and store information and is responsible for the personal data we hold (collectively referred to as ela8, "we", "us" or "our" in this privacy notice).

In respect of data collected in order to meet our contractual obligations to our clients we will operate as a data controller, as stated in our terms of business and engagement letters.

If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact Mark Davis at mark.davis@ela8.co.uk. Our full details are:

- Legal entity: ela8 Limited (company number 06060813)
- Person responsible for data protection: Mark Davis
- Postal address: 3rd Floor, The Coade, 98 Vauxhall Walk, London United Kingdom, SE11 5EL
- Telephone number: 0203 740 7172

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with any concerns before you approach the ICO so please contact us in the first instance.

Changes to the Privacy Notice and your duty to inform us of changes

This notice was last updated on 22 January 2026. It is important that any personal data we hold about you is accurate and current so please endeavour to keep us informed if your personal data changes during your relationship with us.

2 The data we collect

Personal data means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data including:

- **Identity Data,** including first name, last name, title, date of birth and gender – match to data request
- **Employment Data,** including remuneration details, employment reference numbers, start / leave dates, references and role details, whether held as a permanent, temporary or contract employee
- **Contact Data,** including contact address, email address and telephone numbers
- **Technical Data,** including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website
- **Usage Data,** including information about how you use our website, products and services including the full Uniform Resource Locators (URL), clickstream to, through and from our sites (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our client office number
- **Marketing and Communications Data,** including your preferences in receiving marketing from us and our third parties and your communication preferences

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from personal data but is not considered personal data in law as this data does not directly or indirectly reveal an individual's identity. For example, we may aggregate Usage Data to calculate the percentage of users accessing a specific website feature. However, if it is possible to combine or connect Aggregated Data with personal data so that it can directly or indirectly identify an individual, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data (this includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health and genetic / biometric data), nor do we collect any information about criminal convictions and offences.

Failure to provide personal data
Where we need to collect personal data whether by law, under the terms of a contract or to consider an application for a role with us, if sufficient data is not provided when requested we may not be able to perform the contract we have or are trying to enter into. In this case, we may have to cancel a service or we may not be able to progress an application for a role with us. We will notify the relevant person if this is the case at the time.

3 How is personal data collected?

We use different methods to collect data including through:

- **Direct interactions.** An individual may give us Identity and Contact Data by filling in an online form or by corresponding with us by post, phone, email or otherwise. This includes personal data provided when an individual:
    - asks us to supply them with services
    - applies for a role with us
    - requests marketing to be sent
    - enters a competition, promotion or survey
    - gives us some feedback

- **Automated technologies or interactions.** As individuals interact with our website, we may wish to collect Technical Data about equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies and will ask for your consent when this is the case.

- **Third parties or publicly available sources.** We may receive or collect Identity and Contact Data about you from public sources such as Companies House and the Electoral Register, or from your Employer.

4 How we use personal data

We will only use personal data when the law allows us to. Most commonly, we will use personal data in the following circumstances:

- To consider an application for a role with us.

- Where we need to perform a contract we are about to enter into or have entered into with an individual or an organisation.

- Where it is necessary for our legitimate interests (or those of a third party) and the interests of an individual, and their fundamental rights, do not override those interests.

- Where we need to comply with a legal or regulatory obligation.

As required under GDPR our legal bases (and processing activities) are aligned with the purpose of processing; there are few purposes for which consent is the most appropriate legal basis.

Purposes for which we will use personal data
We have set out below, in a table format, a description of all the ways we may use personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process personal data on more than one legal basis depending on the specific purpose for which we are using the data. Please email us at mark.davis@ela8.co.uk if you need details

about the specific legal basis we are relying on to process personal data about you or as a result of our work with your organisation, where more than one basis has been set out in the table below.

Purpose	Type of Data	Legal Basis (see glossary)
To register an individual as a new or potential client	○ Identity ○ Contact	○ Necessary for our legitimate interests (keep records of our interactions with you, provide services, marketing) ○ Performance of a contract
To consider an application for a role with us	○ Identity ○ Employment ○ Contact	○ Legitimate Interests (to recruit staff for our business)
To manage our relationships with clients and individuals	○ Identity ○ Employment ○ Contact	○ Performance of a contract ○ Necessary to comply with a legal / contractual requirement ○ Necessary for our legitimate interests (keep our records up to date)
To administer and protect our business and infrastructure	○ Identity ○ Employment ○ Contact ○ Technical ○ Usage	○ Necessary for our legitimate interests (run our business securely and safely, provide IT and administration infrastructure and in the event of a business re-organisation) ○ Necessary to comply with a legal obligation
To provide our services	○ Identity ○ Employment	○ Legitimate Interests (to deliver services under a contract)
To deliver website content and advertising, and measure the effectiveness of these activities	○ Identity ○ Contact ○ Technical ○ Usage	○ Consent
To use data analytics to improve our website, products and services, marketing, relationships and experiences	○ Identity ○ Contact ○ Technical ○ Usage	○ Consent
For the purposes of Marketing and Communications	○ Identity ○ Contact ○ Technical ○ Usage	○ Consent
Please note that due to the nature of our business we may process personal data without knowledge or consent in compliance with the above rules, where this is required and permitted by law.		

Marketing

We aim to provide individuals with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

- Promotional offers from us - we may use your Identity, Contact, Technical and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

  You will receive marketing communications from us if you have been referred to us by a third party (with your prior consent), you have requested information from us or purchased services from us or if you have provided us with your details, including when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

- Third-party marketing - we do not share your personal data with third parties for marketing purposes.

- Opting out - you can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing admin@ela8.co.uk.

  Where you opt out of receiving marketing messages, this will not apply to personal data provided to us for the purposes of providing a service to a customer of ours, or to any application for a role with us or other legitimate transactions.

- Cookies - a cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We may use the following cookies, in which case we will seek your consent for the following purposes:

- Analytical/performance - they allow us to recognise and count the number of visitors to our website and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. We may also use a suite of applications provided by Google (who are based outside the UK) including Google Analytics, Google Optimise, Google AdWords and Google TagManager and Bing which use cookies to collect Technical and Usage Data about your visit to our website.

- Functionality - these are used to recognise you when you return to our website so for example, you are not asked to consent to us using cookies each time you visit us.

- Targeting and remarketing - these cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may use a Facebook cookie which will allow adverts relating to our services to be displayed on any accounts you have with Facebook up to 30 days after you have visited our site.

  Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control as they are not part of our website. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. Further, Google has developed a browser add-on to allow users to opt-out of Google Analytics across all websites and Facebook allows you to change you behavioural ads preference. However, please note that if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

- **Change of purpose** - we will only use personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use personal data for an unrelated purpose, we will notify anyone affected and we will explain the legal basis which allows us to do so.

5. Disclosures of personal data

We may have to share personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Service providers acting as processors based in the UK, Europe or US who provide IT and system administration services to us.
- Professional advisers acting as data processors including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors based in the UK.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use personal data for their own purposes and only permit them to process personal data for specified purposes and in accordance with our instructions.

6 International transfers

Some of our external third-party service providers are based outside the UK so their processing of personal data will involve a transfer of data outside the UK.

Whenever we transfer personal data out of the UK to countries that have not been recognised for providing adequate protection (i.e. granted an adequacy decision), we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use certain service providers, we will use standard data protection clauses approved by the UK Government or ICO which give personal data similar protection it has in the UK.

- Supplementary measures will be used in conjunction with standard data protection clauses for service providers who process personal data in the United States or where we deem it necessary.

Please contact us if you want further information on the specific mechanism used by us when transferring personal data out of the UK.

7 Data security

We have put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify both affected parties and any applicable regulator of a breach where we are legally required to do so.

8 Data retention

How long will you use personal data for?
We will only retain personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us. In some circumstances you can ask us to delete data: please contact us for details.

In some circumstances we may anonymise personal data (so that it can no longer be associated to a specific individual) for research or statistical purposes in which case we may use this information indefinitely without further notice.

9 Legal rights

Under certain circumstances, individuals have rights under data protection laws in relation to their own personal data. These include the right to:

- Request access to personal data (commonly known as a "data subject access request"). This enables an individual to receive a copy of the personal data we hold and to check that we are lawfully processing it.

- Request correction of any personal data held. This enables an individual to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of any new data provided.

- Request erasure of personal data. This enables an individual to ask us to delete or remove personal data where there is no good reason for us continuing to process it. The individual also has the right to ask us to delete or remove your personal data where they have successfully exercised their right to object to processing (see below), where we may have processed information unlawfully or where we are required to erase personal data to comply with local law. Note, however, that we may not always be able to comply with requests of erasure for specific legal reasons which will be notified to the individual, if applicable, at the time of their request.

- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about a particular situation which makes an individual want to object to processing on this ground as they feel it impacts on their fundamental rights and freedoms. The individual also has the right to object where we are processing their personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process information which overrides individual rights and freedoms.

- Request restriction of processing of personal data. This enables an individual to ask us to suspend the processing of their personal data in the following scenarios: (a) if they want us to establish the data's accuracy; (b) where our use of the data is unlawful but they do not want us to erase it; (c) where they need us to hold the data even if we no longer require it as they need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of personal data to themselves or to a third party. We will provide to the individual, or a third party they have chosen, their personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which was initially provided consent for us to use or where we used the information to perform a contract with the individual.

- Withdraw consent at any time where we are relying on consent to process personal data. However, this will not affect the lawfulness of any processing carried out before consent was withdrawn. If and individual withdraws consent, we may not be able to provide certain products or services. We will advise the individual if this is the case at the time consent is withdrawn.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required
An individual will not have to pay a fee to access their own personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if the request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with request in these circumstances.

What we may need
We may need to request specific information to help us confirm identity and ensure the right to access personal data (or to exercise any other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also ask for further information in relation to a request to speed up our response.

Time limit to respond
We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if the request is particularly complex or a number of requests have been made and we will notify the relevant party if this is the case.

10 Changes to our Privacy Notice

Any changes we make to our Privacy Notice in the future will be posted on this page. Please check back frequently to see any updates or changes to our Privacy Notice.

11 Glossary

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on the individual (both positive and negative) and their rights before we process personal data for our legitimate interests. We do not use personal data for activities where our interests are overridden by the impact on the individual (unless we have consent or are otherwise required or permitted to by law). Further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities can be obtained by contacting us.

Performance of Contract means processing data where it is necessary for the performance of a contract or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.