

# PRIVACY POLICY

(HPS GROUP)

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08/01/2019

## BACKGROUND AND CONTEXT

This policy sets out how **HPS Group** manages personal data in relation to third parties who access our website. All questions about this policy should be directed to [compliance@hpsgroup.co.uk](mailto:compliance@hpsgroup.co.uk)

## DOCUMENT HISTORY

Version	Date	Author	Changes
1.0	16/07/2018	Guy Vincent	Creation of group policy
2.0	08/01/2019	Guy Vincent	Updates to group policy

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## INTRODUCTION

**HPS Group** is made up of a number of companies including HPS Marketing Communications, Breakfast of Champions, HPS Jardine, HPS Retail 7, HPS MM Eye, Hanson Zandi and Insitas. This Privacy Policy is used by and applies to all the brands in the HPS Group. In this Privacy Policy any reference to HPS Group includes all the HPS Group companies.

This Privacy Policy is divided in four parts, Part A is applicable to third party users of HPS Group websites, Part B to **HPS Group** staff, Part C to prospective staff and Part D to **HPS Group** casual workers.

## INFORMATION ABOUT US

<https://hpsgroup.co.uk/> is a site operated by HPS Group. We are a private limited company registered in England and Wales under company number 04114693. Our trading name is HPS Group. Our main trading address is Atlas House, Third Avenue, Globe Park, Marlow, Bucks SL7 1EY. Our VAT number is GB 604 0292 83.

We are committed to protecting and respecting your privacy. We are responsible for protecting your personal information as a “Data Controller” under applicable data protection legislation. If you have any queries about this policy or how we use your personal information, please contact us using the details at Contact Us.

This policy (together with our Terms of Use and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <https://hpsgroup.co.uk/> you are accepting and consenting to the practices described in this policy.

Our nominated person for data protection is Richard Triggs, CFO and his contact details are [r.triggs@hpsgroup.co.uk](mailto:r.triggs@hpsgroup.co.uk).

**This privacy policy does NOT apply to data submitted by respondents who have completed or are about to complete a market research survey. For the privacy policy relevant to such surveys you should contact the company that has asked you to complete the survey.**

## PART A PRIVACY POLICY – THIRD PARTY WEBSITE USERS

### 1. PURPOSE

The purpose of Part A of this policy is to outline how HPS Group handles and manages the personal data in relation to third parties accessing our website.

### 2. SCOPE

This policy applies to the HPS Group website: [www.hpsgroup.co.uk](http://www.hpsgroup.co.uk) and all other websites of the HPS Group.

### **3. POLICY**

#### **3.1. WHAT INFORMATION DO WE COLLECT**

We collect personal data as defined by applicable data protection legislation. The personal information we collect might include name, date of birth, email address, postal address, telephone number, job title and company name, and, where applicable, your Twitter handle.

If you provide services to HPS Group, we will collect information in line with your contract for services.

If you have purchased goods or services from us, we will collect information about your purchase history.

We may collect information that is available in the public domain, for example: newspaper or online media items, publicly available posts on LinkedIn or social media or Companies House listings.

We record your requests for information and any feedback we receive from you and record emails for quality assurance purposes.

We may also collect technical information relating to your use of our website, including your browser type or the Internet Protocol (IP) address used to connect your computer to the Internet.

We also gather general information about the use of our website, such as which pages users visit most often and which services, events or facilities are of most interest. We may also track which pages users visit when they click on links in emails. We may use this information to personalise our emails to you and the way our website is presented when users visit, to make improvements to our website and to ensure we provide the best service for users.

Wherever possible we use aggregated or anonymous information which does not identify individual visitors to our website.

#### **3.2. HOW DO WE COLLECT INFORMATION?**

We obtain personal information from you when you use our website, enquire about our activities, register with us, send or receive an email, ask a question or otherwise provide us with personal information.

We may also receive information about you from third parties, for example from data providers or from individuals or third-party organisations who share our interests and may introduce you to us.

As you interact with our website, we may automatically collect information about you, such as the details of the company you work for, we collect this personal data through a third-party enquiry management system that uses algorithms and other similar technologies to create a profile about you.

We may also match the information you give us against information from third party sources such as your company website to build a more complete profile of you.

#### **3.3. WHY DO WE COLLECT THIS INFORMATION**

We collect this information for the purpose of contacting you with relevant updates about our business including marketing messages. The lawful basis for which we process your information is:

- your consent, for example, in the case of the profiling activities described in paragraph 3.2;
- processing is necessary for the performance of a contract to which you are a party. If you fail to provide this information we may be unable to perform the contract. We rely on this basis, for example, for sharing your details with a venue provider for a masterclass you have signed up for with us; HPS Group partners who may

be delivering content at a masterclass you are attending. We also rely on this basis where we process your data to deliver information to you if you have enquired about our business, products or services; and

- processing is necessary for our legitimate interest in promoting our business and services, except where your rights as a data subject override our legitimate interest. We rely on our legitimate interests, for example, where we process your personal data to gather information about the use of our website.

### **3.4. HOW DO WE USE THIS INFORMATION?**

We will use your personal information:

- to provide you with services, products or information you have requested;
- to provide you with information about future events and products and services we think may be of interest to you, including third-party events, products and services;
- for administration purposes including to create an account for you if you register with us; to notify you about changes to our services; as part of our efforts to keep our site safe and secure; and to ensure that content from our site is presented in the most effective manner for you and for your computer; and
- to make suggestions and recommendations to you about goods or services that may interest you.

We will only use your personal information for electronic marketing purposes if we are allowed to do this by law or if we have your consent. If you agree to us providing you with marketing information, you can always opt out at a later date. If you would rather not receive marketing material from us, please let us know at any time using the contact details at Contact Us.

### **3.5. DO WE SHARE YOUR INFORMATION WITH ANYONE ELSE?**

We share your personal information with:

- third-party system operators for the purpose of marketing communication deployment only; and
- our trusted affiliates as detailed below

We may share your personal information with third parties for marketing purposes. If you do not want us to share your personal data with any third party for marketing purposes, please let us know using the contact details Contact Us.

We may need to provide your information to our contractors and suppliers who provide services on our behalf, to the extent necessary to enable you to receive those services.

We may share your information with the service providers or other associated organisations as identified in this policy to use the information for their own purposes as described above.

If you make a payment to us we will need to share your information with our payment processor. By paying via our payment processor you agree to accept their terms and conditions for the use of their services, including their privacy policy. We suggest that you read their privacy policy when using their service as we are not responsible for data you share with them.

We may also need to disclose your information if required to do so by law or as expressly permitted under applicable data protection legislation.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy

policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **International transfers to third parties.**

Some of the third parties described in this privacy policy, which provide services to us under contract for the purposes described in this policy, are based in the United States. If we share your information with third parties in the US, we make use of the EU-U.S. Privacy Shield Frameworks, European Commission approved standard contractual data protection clauses, binding corporate rules for transfers to data processors, or other appropriate legal mechanisms to safeguard the transfer. This Privacy Policy shall apply even if we transfer your information to the US. We have in place appropriate safeguards to require that your information will remain protected.

### **3.6. HOW LONG DO WE KEEP YOUR INFORMATION FOR?**

We keep your information for no longer than necessary, as detailed in our Record retention policy. We will retain your information for any period required by law, for example for compliance with HMRC requirement. Where we are not under a legal obligation to retain your information, we will determine what is necessary by reference to the lawful basis for processing set out above and our legitimate interests.

**Insitas Research abides by the ESOMAR and MRS Codes of Conduct.**

If you have any questions about how long we keep your information, please write to us at [compliance@hpsgroup.co.uk](mailto:compliance@hpsgroup.co.uk).

### **3.7. HOW DO WE PROTECT PERSONAL INFORMATION?**

We take appropriate technical and organisational measures to ensure that the information disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used. We protect your information in accordance with our IT and Data protection policy.

You should be aware that the use of the Internet is not entirely secure and although we will do our best to protect your personal data we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet. Any transmission is at your own risk.

Once we have received your information, we will use strict procedures and security features such as encryption to try to prevent unauthorised access.

HPS Group also provides training and support for staff and independent contractors who handle personal data, so that they can act confidently and consistently. In addition to being open and transparent, HPS Group will seek to give individuals as much choice as is possible and reasonable, over what data is held and how it is used.

### **3.8. TRANSPARENCY**

HPS Group is committed to ensuring that in principle, data subjects are aware that their data is being processed and:

- for what purpose it is being processed
- what types of disclosure are likely
- how to exercise their rights in relation to the data.

For further information, please see our data protection policy.

### **3.9. COMMUNICATING OUR DATA PROTECTION PROCESSES**

There's a variety of guidance that is issued to all employees to ensure adherence to these commitments. The guidance that is currently issued, and updated regularly, consists of:

- Data Protection induction (and accompanying guidance documents sent to attendees post-induction)
- IT Security induction
- IT Security policy issued to all new starters to read and sign/accept via Octopus
- Team PIAs and data handling crib sheets
- Ad hoc communications via emails, Team Heads briefings and to individual project teams in project meets

The compliance team also maintains a 'Cyclic Reviews Log' which plots all cyclic compliance processes and/or review timeframes. This includes reviewing internal documents and guidance that the agency follows, such as: Privacy Notices (web form Ts & Cs template), Data Processing Agreements, Non-Disclosure Agreements, DPIAs, PIAs, etc.

### **3.10. YOUR RIGHTS**

You have a right to access the information we process about you. This includes being provided with a copy of the information we hold about you, the purposes for which we use it and with whom it has been shared ('right of access').

You may ask us, or we may ask you, to rectify information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate or complete information which is incomplete ('right to rectification'). If you inform us that your personal data is inaccurate, we will inform relevant third parties with whom we have shared your data so they may update their own records.

In order that we can ensure that your personal information is accurate and up to date, if any of the information that you have provided us with changes, for example if you change your email address, name, payment details, or if you wish to cancel your registration, please let us know using the contact details at the end of this policy.

You have a right to obtain your personal data from us and reuse it for your own purposes, perhaps for another service, without hindering the usability of the data ('right of portability'). This right does not apply where our legal basis for processing is to perform a task carried out in the public interest or to exercise official authority.

You have a right to seek the erasure of your data (often referred to as the 'right to be forgotten'). You may wish to exercise this right for any reason, for example where it is no longer necessary for us to continue holding or processing your personal data and you may withdraw your consent. This right is not absolute, as we may need to continue processing this information, for example, to comply with our legal obligations, or for reasons of public interest.

In certain circumstances, for example if you contest the accuracy of the information or the lawfulness of our processing, you may ask us to restrict our processing of your information ('right to restriction').

If you exercise your right to restrict processing, we would still need to process your information to the extent permitted by law, including for the purpose of exercising or defending legal claims, protecting the rights of another person or for public interest reasons.

If our lawful basis for processing is your consent, you have the right to withdraw your consent at any time.

You have the right to object to our processing in accordance with our legitimate interests, in which case we may only continue to use your personal data where we can demonstrate compelling legitimate grounds which override your interests, rights and freedoms.

You have a right to prevent us from processing your data for the purposes of marketing.

You have a right to object at any time to our automated decision-making activities in relation to your data.

If you would like to exercise any of your rights above, please contact us at [compliance@hpsgroup.co.uk](mailto:compliance@hpsgroup.co.uk). We will act in accordance with your instructions as soon as reasonably possible and there will be no charge.

You have a right to report any of your concerns about our use of your data to the Information Commissioner's Office. You may do so by calling their helpline at 0303 123 1113.

## **PART B – PRIVACY POLICY – EXISTING STAFF**

### **4.0 PURPOSE**

The purpose of Part B of this policy is to outline how HPS Group handles and manages the personal data in relation to existing staff.

### **5.0 SCOPE**

This policy applies to all HPS Group affiliates and employees.

### **6.0 POLICY**

#### **6.1 WHAT INFORMATION DO WE COLLECT?**

We collect personal data as defined by applicable data protection legislation. The personal information we collect might include name, date of birth, gender, email address, postal address, telephone number, financial information, medical information and geolocational data (where you have been provided with an electronic device by us or a third party).

We collect information in line with your contract of employment with us.

We may collect information that is available in the public domain, for example:

- Newspaper or online media items
- Publicly available posts on LinkedIn or social media
- Companies House listings

We record your requests for information and any feedback we receive from you and record emails for quality assurance purposes.

We may also collect technical information relating to your use of our website, including your browser type or the Internet Protocol (IP) address used to connect your computer to the Internet.

We also gather general information about the use of our website, such as which pages users visit most often and which services, events or facilities are of most interest. We may also track which pages users visit when they click on links in emails. We may use this information to personalise our emails to you and the way our website is presented when users visit, to make improvements to our website and to ensure we provide the best service for users. Wherever possible we use aggregated or anonymous information which does not identify individual visitors to our website.

#### **6.2 HOW DO WE COLLECT INFORMATION?**

We collect information from you in the course of your employment with us.

We obtain personal information from you when you use our website, enquire about our activities, register with us, send or receive an email, ask a question or otherwise provide us with personal information.

We may also receive information about you from third parties, for example from recruitment agencies, previous employers, healthcare professionals, the disclosure barring service or social media platforms, CCTV, third party clients for whom we provide services, customers, suppliers and service providers or from individuals or third-party organisations who share our interests and may introduce you to us.

### **6.3 WHY DO WE COLLECT THIS INFORMATION?**

We collect this information for the purposes of:

- complying with our statutory requirements, meeting our legitimate interests, ensuring proper conduct of our business, complying with the terms of our contract with you and for all purposes in connection with your employment with us;
- fulfilling our contractual obligations towards you, such as payroll;
- managing your sickness absence and for health and safety purposes;
- if we have or a third party has provided you with an electronic device to track your location using geo-locational data; and
- investigating and reporting on staff activities for the purpose of our disciplinary and grievance procedures.

We may collect special category data (such as racial and ethnic origin, religious belief and information relating to sexual orientation) for equal opportunities monitoring. Such information will be collected on an anonymous basis.

We are also required to share photographs of you with our clients where necessary in accordance with the client's terms of business, including (but not limited) in order to comply with their internal security and/or expenses policies.

The principal lawful basis for which we process your information is that the processing is necessary for our legitimate interest of the smooth operation and management of our business and those third-party businesses for whom we provide services, except where your rights as a data subject override our legitimate interest.

We may also process your information where such processing is necessary for:

- the performance of a contract to which you are a party (for example, to receive staff benefits). If you fail to provide this information we may be unable to perform the contract;
- compliance with our legal obligations in accordance with employment and social security law;

We may carry out further processing with your consent where necessary:

- for vetting purposes where appropriate e.g. DBS checking

### **6.4 HOW DO WE USE THIS INFORMATION?**

We will use your personal information:

- to provide you with information you have requested or key business information;
- to provide you with information about future events we think may be of interest to you, including third party events, products and services;
- for administration purposes including to create an account for you if you register with us; to notify you about changes to our services; as part of our efforts to keep our site safe and

secure; and to ensure that content from our site is presented in the most effective manner for you and for your computer.

We will only use your personal information for electronic marketing purposes if we are allowed to do this by law or if we have your consent. If you agree to us providing you with marketing information, you can always opt out at a later date. If you would rather not receive marketing material from us, please let us know at any time using the contact details at Contact Us.

## **6.5 DO WE SHARE YOUR INFORMATION WITH ANYONE ELSE?**

We share your personal information with:

- third-party system operators for the purpose of administration and payroll, safeguarding and vetting processes;
- our trusted affiliates as detailed below;
- our clients, for the purposes of providing services to them.

Where stated in your employment contract we may transfer your information to a country outside of the EEA to our client. We do this under EU model clauses. This may include sharing geolocational data with the third-party provider of any device provided to you.

We may share your personal information with third parties for marketing purposes. If you do not want us to share your personal data with any third party for marketing purposes, please let us know using the contact details Contact Us.

We may need to provide your information to our contractors and suppliers who provide services on our behalf, to the extent necessary to enable you to receive those services.

We may share your information with the service providers or other associated organisations as identified in this policy to use the information for their own purposes as described above.

If you make a payment to us we will need to share your information with our payment processor. By paying via our payment processor you agree to accept their terms and conditions for the use of their services, including their privacy policy. We suggest that you read their privacy policy when using their service as we are not responsible for data you share with them.

We may also need to disclose your information if required to do so by law or as expressly permitted under applicable data protection legislation.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

CLAUSES 3.6 TO 3.10 (INCLUSIVE) OF PART A ALSO APPLY TO THIS PART B OF THE POLICY

## **PART C – PRIVACY POLICY – PROSPECTIVE STAFF**

### **7.0 PURPOSE**

The purpose of Part C of this policy is to outline how HPS Group handles and manages the personal data received through the careers page on our website.

### **8.0 SCOPE**

This policy applies to all HPS Group affiliates and employees.

### **9.0 POLICY**

#### **9.1 WHAT INFORMATION DO WE COLLECT?**

We collect personal data as defined by applicable data protection legislation. The personal information we collect might include name, date of birth, gender, email address, postal address, telephone number and geolocational data (where you have been provided with an electronic device by us or a third party).

We collect information in line with your contract of employment with us.

We may collect information that is available in the public domain, for example:

- Newspaper or online media items
- Publicly available posts on LinkedIn or social media
- Companies House listings

We record your requests for information and any feedback we receive from you and record emails for quality assurance purposes.

We may also collect technical information relating to your use of our website, including your browser type or the Internet Protocol (IP) address used to connect your computer to the Internet.

We also gather general information about the use of our website, such as which pages users visit most often and which services, events or facilities are of most interest. We may also track which pages users visit when they click on links in emails. We may use this information to personalise our emails to you and the way our website is presented when users visit, to make improvements to our website and to ensure we provide the best service for users. Wherever possible we use aggregated or anonymous information which does not identify individual visitors to our website.

#### **9.2 HOW DO WE COLLECT INFORMATION?**

We obtain personal information from you when you use our website, enquire about our activities, register with us, send or receive an email, ask a question or otherwise provide us with personal information.

We may also receive information about you from third parties, for example from recruitment agencies, previous employers or social media platforms, or from individuals or third-party organisation who share our interest and may introduce you to us.

#### **9.3 WHY DO WE COLLECT THIS INFORMATION?**

We collect this information for the purpose of reviewing your application form and contacting you if your application is successful and to complete any necessary vetting processes.

The lawful basis for which we process your information is:

- based on your consent for recruitment purposes and;
- processing is necessary in our legitimate interests for the purpose of confirming your suitability for employment with us, such as sharing with the Disclosure Barring Service for the purpose of DBS checking except where your rights as a data subject override our legitimate interest.

#### **9.4 HOW DO WE USE THIS INFORMATION?**

We will use your personal information in the following ways:

- to provide you with the information you have requested
- for administration purposes including to keep a record of all applications we receive and review of candidates for future roles
- for vetting purposes where appropriate, e.g. DBS checks

We will only use your personal information for electronic marketing purposes if we are allowed to do this by law or if we have your consent. If you agree to us providing you with marketing information, you can always opt out at a later date. If you would rather not receive marketing material from us, please let us know at any time using the contact details at Contact Us.

#### **9.5 DO WE SHARE YOUR INFORMATION WITH ANYONE ELSE?**

We share your personal information with:

- third-party system operators for the purpose of processing your online form submissions and;
- our trusted affiliates as detailed below;

We may share your personal information with third parties for marketing purposes. If you do not want us to share your personal data with any third party for marketing purposes, please let us know using the contact details Contact Us.

We may need to provide your information to our contractors and suppliers who provide services on our behalf, to the extent necessary to enable you to receive those services.

We may share your information with the service providers or other associated organisations as identified in this policy to use the information for their own purposes as described above.

We may also need to disclose your information if required to do so by law or as expressly permitted under applicable data protection legislation.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

CLAUSES 3.6 TO 3.10 (INCLUSIVE) OF PART A ALSO APPLY TO THIS PART C OF THE POLICY

## **PART D – PRIVACY POLICY – CASUAL WORKERS**

### **10.0 PURPOSE**

The purpose of Part D of this policy is to outline how HPS Group handles and manages the personal data received through the pages on our website relating to casual workers.

### **11.0 SCOPE**

This policy applies to all HPS Group affiliates and employees.

### **12.0 POLICY**

#### **12.1 WHAT INFORMATION DO WE COLLECT?**

We collect personal data as defined by applicable data protection legislation. The personal information we collect might include name, date of birth, gender, email address, postal address, telephone number and geolocational data (where you have been provided with an electronic device by us or a third party).

We collect information in line with your contract as a casual worker with us.

We may collect information that is available in the public domain, for example:

- Newspaper or online media items
- Publicly available posts on LinkedIn or social media
- Companies House listings

We record your requests for information and any feedback we receive from you and record emails for quality assurance purposes.

We may also collect technical information relating to your use of our website, including your browser type or the Internet Protocol (IP) address used to connect your computer to the Internet.

We also gather general information about the use of our website, such as which pages users visit most often and which services, events or facilities are of most interest. We may also track which pages users visit when they click on links in emails. We may use this information to personalise our emails to you and the way our website is presented when users visit, to make improvements to our website and to ensure we provide the best service for users.

Wherever possible we use aggregated or anonymous information which does not identify individual visitors to our website.

#### **12.2 HOW DO WE COLLECT THIS INFORMATION?**

We obtain personal information from you when you use our website, enquire about our activities, register with us, send or receive an email, ask a question or otherwise provide us with personal information.

We may also receive information about you from third parties, for example from recruitment agencies, previous employers or social media platforms, or from individuals or third-party organisation who share our interest and may introduce you to us.

### **12.3 WHY DO WE COLLECT THIS INFORMATION?**

We collect this information for the purpose of reviewing your application form and contacting you if your application is successful and to complete any necessary vetting processes and to offer you casual work from time to time.

The lawful basis for which we process your information is:

- based on your consent for recruitment purposes and being offered casual work;
- processing is necessary in our legitimate interests for the purpose of confirming your suitability for casual work with our clients, such as sharing with the Disclosure Barring Service for the purpose of DBS checking except where your rights as a data subject override our legitimate interest.

### **12.4 HOW DO WE USE THIS INFORMATION?**

We will use your personal information in the following ways:

- to provide you with the information you have requested and offers of casual work
- for administration purposes including to keep a record of all applications we receive and review of candidates for future roles
- for vetting purposes where appropriate, e.g. DBS checks

We will only use your personal information for electronic marketing purposes if we are allowed to do this by law or if we have your consent. If you agree to us providing you with marketing information, you can always opt out at a later date. If you would rather not receive marketing material from us, please let us know at any time using the contact details at Contact Us.

### **12.5 DO WE SHARE YOUR INFORMATION WITH ANYONE ELSE?**

We share your personal information with:

- our clients who are seeking casual workers
- third-party system operators for the purpose of processing your online form submissions and;
- our trusted affiliates as detailed below;

We may share your personal information with third parties for marketing purposes. If you do not want us to share your personal data with any third party for marketing purposes, please let us know using the contact details Contact Us.

We reserve the right to share your data, including any CV submitted by you, your work experience, skills, qualifications and personal image when discussing casual work with any of our clients.

We may need to provide your information to our contractors and suppliers who provide services on our behalf, to the extent necessary to enable you to receive those services.

We may share your information with the service providers or other associated organisations as identified in this policy to use the information for their own purposes as described above.

We may also need to disclose your information if required to do so by law or as expressly permitted under applicable data protection legislation.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy

policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

CLAUSES 3.6 TO 3.10 (INCLUSIVE) OF PART A ALSO APPLY TO THIS PART D OF THE POLICY

### **13.0 COOKIES**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy.

### **14.0 CHANGES TO THIS POLICY**

Any changes we may make to our Privacy policy in the future will be posted at <https://hpsgroup.co.uk/privacy-policy>, and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy policy. By continuing to use our website you will be deemed to have accepted such changes.

This Privacy policy was last amended in January 2019.

### **15.0 APPROVAL**

This policy shall be effective immediately upon approval.

Title	Approver	Signature	Effective date