

CXPartners

Website data protection notice

CXPartners is now part of Sopra Steria Limited. Sopra Steria Limited is the UK arm of Sopra Steria Group. Sopra Steria Limited's registered address is Three Cherry Trees Lane, Hemel Hempstead, HP2 7AH, Herts, company registration n° 04077975 (hereinafter referred to as "**Sopra Steria**" or "**we**" or "**us**") attaches great importance to the protection of Personal data of the Users of its Website (hereinafter referred to as "**Users**" or "**You**").

Sopra Steria respects Your privacy and is committed to protecting Your personal data. As such, this Privacy Notice will inform You about how we collect and look after Your personal data, whilst informing You of Your privacy rights and how the law protects You.

Some of the services offered on certain pages of our website require the processing of Your Personal data. This Privacy Notice aims to give You information on how we collect and process Your personal data, including any data You may provide through this website, if You sign up to our newsletters, purchase a product or service, supply a product or service to us, or take part in an event or competition. This statement does not cover details relating to job applicants which can be found on our careers portal or employees which can be found on our intranet. Former employees can obtain details of their retained data by contacting our Data Protection Officer see below for contact information. This privacy notice is part of the "[Site Terms of Use](#)".

We are the "data controller" in terms of Your personal data, and we are responsible for actions related to how we hold and use personal information about You.

We provide this information in a layered format so You can click through to the specific areas set out below. Please see the 'Definitions' section to further understand some of the terms used in this Privacy Notice.

Every time You wish to use our site, please check this Notice to ensure You understand the terms that apply at that time. Please note that this Notice may be updated from time to time by Sopra Steria. Any changes since the publication date will be listed in Section 12 of the Notice.

This Notice complies with applicable laws including Data Protection Law (DPL), including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA, 2018) and the Privacy and Electronic Communications Regulation 2003 (PECR, 2003). This Privacy Notice should be considered alongside any other Privacy Notices, Informed Consent Notices, [Cookie Policy](#) or Fair Processing Statements which we may provide relating to particular activities and is not intended to override them.

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1. Data Protection Principles

We actively comply with the data protection principles set out in data protection law, including the DPA 2018, and the UK GDPR. Together, these say that personal information we hold about You must be:

- used lawfully, fairly and in a transparent way
- collected only for valid purposes that we have clearly explained to You and not used in any way that is incompatible with those purposes
- relevant to the purposes we have told You about and limited only to those purposes
- accurate and kept up to date
- kept only as long as necessary for the purposes we have told You about
- kept securely and where shared with third parties, inform You, particularly if this is outside of the UK.

2. The types of information we hold about You

Personal data, or personal information, means any information about an individual from which a living person can be identified. It does not include data where an identity has been removed (anonymous data).

As a site user, supplier, client, or prospect we may collect, use, store and transfer various kinds of personal data about You which we have listed together as follows:

- **Identification Data** including first name, last name, marital status, title, company name, Job Title/ Position.
- **Contact Data** including physical address, email address and telephone numbers, location/country.
- **Technical Data** including internet protocol (IP) address, 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 this website.

- **Profile Data** including Your interests, preferences, feedback, and survey responses.
- **Usage Data** including information about how You use our website and Your interactions with marketing content.
- **Marketing and Communications Data** includes Your preferences in receiving marketing materials from us and our third parties and Your communication preferences.
- **Client Data** where we perform a service for You.

We may also use Your personal data to generate Aggregated Data. For example, we may aggregate Your Usage Data to calculate the percentage of Users accessing a specific website feature. Aggregated Data is not personal data in law as it is anonymised.

There are "Special Categories" of more sensitive personal data which require a higher level of protection, such as details about Your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about Your health and genetic and biometric data, and financial information. In rare cases, data relating to children and criminal offence information may be processed as part of the services we offer.

2.1 Maintaining Data Accuracy

It is important to us that the information we hold about You is accurate and current. Please keep us informed of any changes at info.uk@soprasteria.com.

2.2 If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How Your personal information is collected

We use different methods to collect data from and about You including:

- **Direct interactions.** You may give us Your Identity, Contact, Financial and other data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data You provide when You:
 - enquire about our products or services;
 - discuss the products or services that You may offer to us;
 - subscribe to marketing communications or events;
 - attend events which are run or sponsored by Sopra Steria;
 - enter a competition, promotion, or survey; or
 - provide feedback.
- **Third parties or publicly available sources.** We may receive personal data about You from various third parties and public sources as set out below:
 - Identity and Technical Data from the following parties: analytics providers such as Eloqua and social media channels such as Facebook, LinkedIn, Twitter, Instagram, YouTube; etc.
 - Identity and Contact Data from data brokers or aggregators where You have given consent.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.
- **Automated technologies or interactions.** As You interact with our website, we may automatically collect Technical Data about Your equipment, browsing actions and patterns which might be used with other identifying data to establish other personal information about You. We collect this data by using cookies, server logs and other similar technologies. We may also receive Technical Data about You if You visit other websites employing our cookies. Please see our [Cookie Policy](#) for further details.

4. How we may use Your personal data

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

- Where it is necessary for our legitimate interests (or those of a third party) and Your interests and fundamental rights do not override our legitimate interests (or those of the relevant third party), such as communicate with You about the products and services You purchase (or intend to purchase);
- Where it is necessary for our legitimate interests (or those of a third party) and Your interests and fundamental rights do not override our legitimate interests (or those of the relevant third party), as a Supplier – to communicate with You regarding services or products that You have or may supply to us;
- Where we need to comply with a legal or regulatory obligation.

5. Purposes for which we may use Your personal data

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

Generally, we do not rely on consent as a lawful basis for processing Your personal data, other than in relation to sending marketing communications to You. You have the right to withdraw consent to marketing communications at any time by contacting us at info.uk@soprasteria.com, or by **unsubscribe within any email communication we may send to You (found at the footer of each email)**.

Note that we may process Your personal data for more than one lawful basis depending on the specific purpose(s) for which we are using Your data.

Purpose/Activity	Legal basis and type of data	Categories of personal data
<p>To manage our relationship with You including:</p> <p>(a) Notifying You about changes to our terms</p> <p>(b) Asking You to give feedback</p> <p>(c) Notifying You of job opportunities</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, recruitment, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>	<p>Identity Data</p> <p>Contact Data</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>	<p>Technical data</p> <p>Usage data</p>
<p>To deliver relevant content to You</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>	<p>Identity Data</p> <p>Contact Data</p>

<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>	<p>Technical data Usage Data</p>
<p>To send You information about our offers, news and events, surveys, and polls (newsletters, invitations, and other publications)</p>	<p>(a) Your explicit consent (opt-in consent) via a checkbox, or by taking a positive step during Your registration to receive this information or subscribe to these services</p> <p>(b) Necessary for the legitimate interest of publicising our Products or Services and those of our Group companies</p> <p>(c) If an existing customer, Your consent via soft opt-in (opt out consent).</p>	<p>Identity data Contact data Marketing and communication data Usage data Profile data</p>
<p>To keep You informed of future work opportunities, i.e., recruitment, or to subscribe to our recruitment newsletter, or talent community</p>	<p>(a) Your explicit consent (opt-in consent) via a checkbox, or by taking a positive step during Your registration to receive this information or subscribe to these services</p> <p>(b) Necessary for the legitimate interest of recruiting new staff members and contractors</p>	<p>Identity and contact data</p>

<p>To allow You to register to an event or webinar etc. via our Website, partner websites or social media</p>	<p>Your explicit consent resulting from Your registration/ participation and the execution of the general terms/regulations governing these activities</p>	<p>Identity data Contact data Marketing and communication data Profile data Usage data</p>
<p>To meet our legal obligations and defend our interests in the event of a dispute.</p>	<p>We may be subject to legal and regulatory obligations to disclose data and may also have a legitimate interest in using the data to defend ourselves in the event of legal action.</p>	
<p>For marketing and promotional material based on seminars and webinars attended, as well as for interviews, feedback and endorsements.</p>	<p>Your explicit consent (opt-in consent) via a checkbox, or by taking a positive step during Your registration to receive this information.</p>	<p>Identity data Photography, video, audio Contact data</p>
<p>To organise competitions</p>	<p>Your explicit consent resulting from Your registration/ participation and the execution of the general terms/regulations governing these activities</p>	<p>Identity data Contact data Marketing and communication data Profile data</p>
<p>To enable the use of cookies and/or other trackers – provided You agreed to it (except for strictly necessary cookies) – and subject to the terms and conditions detailed under our Cookies Policy</p>	<p>Your consent</p>	<p>Technical data Usage data</p>

5.1 Marketing

Where we do not currently have Your consent to send You marketing communications:

- and You are an existing customer (or have negotiated to buy a product or service from us), we use soft opt-in under PECR rules to deliver content to You. This means we do not ask for You to 'opt-in' via a checkbox, and instead provide You with the ability to 'opt out' at any time, for example at the footer of each email we send to You;
- and You are not an existing customer or prospective candidate, we use either Your explicit consent (via an opt-in checkbox), or another positive action, such as completing a registration form. In some cases, we might reach out to you on the basis of legitimate interest based on your previous interactions with us and your interests.

If You would like to know about Your marketing preferences, please contact info.uk@soprasteria.com. We retain Your data for three (3) years after Your last digital interaction with our organisation after which Your records will be removed from our marketing database. Where You opt out of our communication, we will retain this instruction for a period of three (3) years after which Your data will be deleted.

We may use Your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think may be of interest to Your organisation.

We do not actively market directly to customers of our clients.

We may in some circumstances need to share Your Personal data with other Sopra Steria Group subsidiaries for marketing purposes.

5.2 Third-party marketing

We will not share Your personal data with any company outside the Sopra Steria group of companies for their marketing purposes without Your permission.

5.3 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 contacting us at any time at info.uk@soprasteria.com.

5.4 Cookies

You can set Your browser to refuse all or some browser cookies, or to alert You when websites set or access cookies. You can find more information [here](#). For more information about the cookies we use, please see our [Cookie Policy](#). You can opt out of cookies on this site at any time via our integrated “Cookie Management” link available in the footer on all pages and as a banner when You access our sites.

If You refuse the cookies, they will not be installed unless they are strictly necessary (a cookie to save Your refusal).

If You disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

5.5 Change of purpose

We will only use Your personal data for the purposes for which we collected it.

If we need to use Your personal data for an unrelated purpose, we will notify You and we will explain the lawful basis which allows us to do so.

Please note that we may process Your personal data without Your knowledge or consent, in compliance with this notice, where this is required or permitted by law.

5.6 Automated decision-making

You will not be subject to decisions that will have a significant impact on You based solely on automated decision-making unless we have a lawful basis for doing so and we have notified You.

6. Data Sharing

We may in some circumstances have to share Your data with third parties, including third-party service providers and other Sopra Steria Group entities. We require third parties to respect the security of Your data and to treat it in accordance with the law.

We may in some circumstances transfer Your personal information outside the UK or EU. Where this is required, we will ensure Your rights are adequately protected through:

- Findings of adequacy (countries deemed by the European Commission and the ICO to have adequate protections for personal data);
- Standard Contractual Clauses (EU Model Clauses with UK the International Data Transfer Addendum)
- Or any other protection deemed adequate by the ICO.

6.1 Why might we share Your personal information with third parties?

We will share Your personal information with third parties where required by law. This may, in some circumstances, involve sharing special categories of personal data or, where relevant, data relating to criminal allegations.

We may also share Your personal information with:

- **Suppliers** involved in providing services as part of our contract with You or for the purpose of communications or events;
- **Professional advisers** including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance and accounting services;
- **Government Authorities** like HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances;
- **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.

6.2 Which third-party service providers process Your personal information?

Some of our group systems are hosted by third parties who also process the data for the purposes set out in this Privacy Notice. These include Oracle, and our site hosting provider. Our site also contains cookies set by third parties, as set out in our [Cookie Policy](#).

6.3 How secure is Your information with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect Your personal information in line with our policies. We only permit them to process Your personal data for specified purposes and in accordance with our instructions.

6.4 When might we share Your personal information with other organisations within the Sopra Steria Group?

Depending on the specific purpose, Your Personal Data may be processed by internal authorised personnel (including marketing & communication, sales, administration, HR and other support functions) of Sopra Steria.

Access to Your Personal data is limited to the performance of the tasks and functions of authorised personnel and is subject to an obligation of confidentiality.

Our group systems (including this website) are hosted in France. Your personal information may be transmitted to, stored, and processed in France. We may share Your personal information with other companies in the UK group or with wider Sopra Steria Group organisations for the purposes set out in 'Purposes for which we will use Your personal data' above.

6.5 Transferring personal data outside of the UK or EU/European Economic Area (EEA)

We may transfer the personal information we collect about You to the following countries outside the UK or EU/EEA:

- India
- United States

There is no adequacy decision by the European Commission or ICO in respect of India. This means that when we transfer Your data to India, it is not deemed to provide an adequate level of protection for Your personal information.

To ensure that Your personal information does receive an adequate level of protection we have put in place the following measures to ensure that Your personal information is treated by those third parties in a way that is consistent with, and which respects EU and UK laws on data protection:

- In respect of transfers of Your personal data to Sopra Steria India; we use an Inter-Office Data Transfer Agreement to transfer data which is deemed to provide an adequate level of protection.
- In respect of transfers of Your personal data to the United States; we transfer Your personal information only to third parties who have signed up to Binding Corporate Rules or Standard Contractual Clauses (Model Clauses with the UK International Transfer Agreement Addendum) or other safeguards deemed adequate by the ICO.

If You require further information about these protective measures, You can request it from Data Protection Officer, Sopra Steria Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH or at dpo.uk@soprasteria.com.

7. Data Security

We have put in place measures to protect the security of Your information.

Third parties will only process Your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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

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

8. Data Retention

How long will we keep Your information for?

We will retain Your personal information 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. This means that the retention period may be defined differently depending on the Purposes pursued by the processing and the specific legal obligations.

Some of the retention periods applicable to Personal data collected on our Website are as follows:

- as long as Your User account remains active,
- for as long as we keep in touch with You through our promotional activities and three (3) years after the last interaction, unless You object to the processing of Your Personal data,
- as long as required by the applicable law,
- cookies and other trackers used on our Website are retained according to our Cookies policy.

It is possible that we may need to keep Your Personal data in intermediate archives with restricted access for evidentiary purposes beyond the above-mentioned periods to comply with legal obligations incumbent on us or, if necessary and in consideration of the statute of limitations, to enforce our rights.

Once Your Personal data is no longer required for the identified Purposes, to meet our legal obligations or to comply with the applicable statute of limitations, we ensure that it is completely destroyed or made anonymous.

9. Legal Rights

Your rights in connection with personal information

You have the following legal rights in connection with Your personal information:

- **Request access to Your personal data.** This enables You to receive a copy of the personal data we hold about You as well as information on how Your Personal Data will be processed and the lawful basis for this processing.
- **Request correction of the personal data that we hold about You.** You can request to have any incomplete or inaccurate data we hold about You corrected, though we may need to verify the accuracy of the new data You provide to us.
- **Request deletion of Your personal data.** You can ask us to delete or remove personal data where there is no other reason for us continuing to process it. You also have the right to ask us to delete or remove Your personal data where You have successfully exercised Your right to object to processing. Please note, however, that the right to erasure is not absolute. We may not always be able to comply fully with Your request of erasure due to specific legal obligations which will be notified to You at the time of Your request.
- **Object to processing** of Your personal data where we are relying on a legitimate interest (or those of a third party), or automated decision making, and You want to object to processing on this ground as You feel it impacts on Your fundamental rights and freedoms. You also have the absolute right to object where we are processing Your personal data for direct marketing purposes. In some cases (with the exception of direct marketing), we may demonstrate that we have compelling legitimate grounds to process Your information which override Your rights and freedoms.
- **Request restriction of processing** of Your personal data. This enables You to ask us to suspend the processing of Your personal data in the following scenarios:
 - (a) if You want us to establish the data's accuracy;
 - (b) where our use of the data is unlawful, but You do not want us to erase it;
 - (c) where You need us to hold the data even if we no longer require it as You need it to establish, exercise or defend legal claims;
 - (d) You have objected to our use of Your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Ask not to be subject to automated processing or profiling** in relation to Your personal data. Typically, this means decision-making by

automated means, including Artificial Intelligence in order to make business decisions. Here, You have the right to ask for a living person to be involved in decision-making, called 'person-in-loop.' You also have the right to ask us to review any decision made by automated means.

- **Withdraw consent** at any time where we are relying on consent to process Your personal data. However, this will not affect the lawfulness of any processing conducted before You withdraw Your consent. If You withdraw Your consent, we may not be able to provide certain products or services to You. We will advise You if this is the case at the time You withdraw Your consent.

If You want to exercise any of these rights, please contact Data Protection Officer, Sopra Steria Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH in writing, or email dpo.uk@soprasteria.com.

Please note that exemptions set out in the Data Protection Act 2018 may apply, meaning that we do not have to grant Your request in full. However, we will always meet Your request as far as we are able.

No fee usually required

You will not have to pay a fee to access Your personal information (or to exercise any of the other rights). However, we are allowed under the law to charge a reasonable fee if Your request for access is clearly unfounded or excessive. Alternatively, we can refuse to comply with the request in such circumstances.

What we may need from You

We sometimes need to request specific information from You to help us confirm Your identity and ensure Your right to access the information (or to exercise any of Your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. If You do not provide such information in a timely manner, this may delay or deny Your request.

10. Data Protection Officer

We have appointed a data protection officer (DPO) to oversee compliance with this Privacy Notice. If You have any questions about this Privacy

Notice or how we handle Your personal information, please contact the DPO at Data Protection Officer, The Company Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH or dpo.uk@soprasteria.com (ICO Registration Number: Z5873869). 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.

11. Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time. We will notify You from time to time about the processing of Your personal information within our communications. Any material changes to the privacy are listed below.

Reviewed November 2024- Changes to reflect alignment with Sopra Steria Group.

12. Definitions

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

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

The term '**soft opt-in**' is sometimes used to describe a rule about existing customers. If You have bought something from us recently (or have

negotiated to buy a product or service from us), provided Your details, and did not opt out of marketing messages, we understand that You are probably happy to receive marketing from us about similar products or services even if You have not specifically consented via a check box. However, when we use soft opt-in we must provide You with a clear chance to opt out – both when we first collected Your details, and in every message, we send to You.

If You have any questions about this privacy notice, please contact Data Protection Officer, Sopra Steria Limited, Three Cherry Trees Lane, Hemel Hempstead HP2 7AH or dpo.uk@soprasteria.com.

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