

LIOS LABS LTD – PRIVACY NOTICE

1 IMPORTANT NOTICE

This is the Privacy Notice of Lios Labs Ltd (company number 17181995) whose registered office is at 44 Grand Parade, Brighton and Hove, East Sussex, England, BN2 9QA (“**Lios Labs**”, “**we**”, “**us**” or “**our**”) and sets out how we collect and process your personal data. This Privacy Notice also provides certain information that is legally required and lists your rights in relation to your personal data. Please read this Privacy Notice to understand how we may use your personal data.

This Privacy Notice relates to personal data that identifies “**you**” meaning users or potential users of the Lios Labs platform (the “**Platform**”), individuals who browse our Platform and individuals outside our organisation with whom we interact. If you are an employee, contractor or otherwise engaged in work for us or applying to work for us, a separate privacy notice applies to you instead.

This Privacy Notice is not intended for children, and we do not knowingly collect personal data relating to children. Additionally, this Privacy Notice is not intended to apply to employees, contractors, individuals otherwise engaged in work for us or applying to work for us.

This Privacy Notice may vary from time to time so please check it regularly. This version of this Privacy Notice was first published in July 2026 and has not been updated since.

2 HOW TO CONTACT US

Controller

This Privacy Notice applies where we are a controller in respect of your personal data – this is where we decide how and why your personal data is processed.

If you wish to correct your personal data held by us or to opt out at any time from receiving marketing correspondence from us or to alter your marketing preferences, please contact contact@lios.uk.

If you need to contact us in connection with our use or processing of your personal data or gain access to it then our contact details are contact@lios.uk.

For the purposes of UK GDPR, if you wish to make a data protection complaint please contact us via the above email address and we will acknowledge receipt of the complaint within 30 days. You also have the right to make a complaint at any time to the Information Commissioner’s Office (ICO) or the equivalent supervisory authority for data protection issues.

3 CATEGORIES OF PERSONAL DATA WE COLLECT

The categories of personal data about you that we may collect, use, store, share and transfer are:

- **Individual Data.** This includes personal data which relates to your identity, such as your first name, middle name, last name, username or similar identifier, marital status, title, date of birth and gender and your contact details such as your billing address, delivery address, email address and telephone numbers;
- **Advertising Data.** This includes personal data which relates to your advertising preferences, such as information about your preferences in receiving marketing materials from us and our third parties and your communication preferences as well as your personal interests. Where permitted, this may involve the use of profiling;
- **Information Technology Data.** This includes personal data which relates to your use of the Platform, such as your internet protocol (IP) address, login data, traffic data, weblogs and other communication 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 Platform;
- **Account and Profile Data.** This includes personal data which relates to your account or profile on the Platform, such as your username and password, subscription commitments made by you, your interests, preferences, feedback and survey responses. Where permitted, we may use Account and Profile Data to analyse or predict your personal preferences and interests in order to provide you with more targeted information and/or improve our offering;
- **Economic and Financial Data.** This includes personal data which relates to your finances, such as your bank account and payment card details and information which we collect from you for the purposes of the prevention of fraud;
- **Sales Data.** This includes personal data which relates to the transactions you have conducted with us such as details about payments to and from you, details of subscriptions to our services or publications and other details of products and services you have purchased from us;
- **Health Data.** This includes personal data concerning your physical or mental health that you choose to provide to us, or that is otherwise relevant to identifying suitable employment opportunities for you, including information about disabilities, medical conditions, workplace adjustments, fitness for certain roles, or health and safety requirements; and
- **Market Research Data.** This includes information relating to recruitment outcomes and employment trends, such as whether a candidate has been successfully placed in a role, for the purposes of market research, business analysis, and improving our recruitment services.

We may also create personal data about you, for example, if you contact us by telephone to make a complaint, for example about our services or goods, then we may make a written record of key details of the conversation so that we can take steps to address the complaint.

We also obtain and use certain aggregated data such as statistical or demographic data for any purpose ("**Aggregated Data**"). Aggregated Data may be derived from your personal data but does not directly or indirectly reveal your identity. For example, we may aggregate your Information Technology Data to calculate the percentage of users accessing a specific feature on our Platform. However, if we re-combine or re-connect Aggregated Data with your personal

data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

In addition, we may obtain certain special categories of your data / special category personal data, and this Privacy Notice specifically sets out how we may process these types of personal data. The special categories of data are: (i) personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; and (ii) the processing of genetic data, biometric data for the purposes of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

4 THE SOURCES FROM WHICH WE OBTAIN YOUR PERSONAL DATA

We obtain your personal data from the following sources:

- **Directly from you**, via the Platform or (rarely) by telephone. This could include personal data which you provide when you:
 - (a) place an order for our products or services;
 - (b) create an account on the Platform;
 - (c) subscribe to our publications;
 - (d) request information on our products or services or for other marketing to be sent to you;
 - (e) enter into a competition or promotion;
 - (f) complete a survey from us or give us feedback;
- **Via automated technologies**, such cookies, server logs and other similar technologies. We may automatically collect Information Technology Data about your equipment, browsing actions and patterns by using cookies, server logs and other similar technologies. We may also receive Information Technology Data about you if you visit other websites employing our cookies. Our website only uses essential and analytical cookies. These cookies help us provide and improve our services and enhance your experience when using the website. We do not use cookies for data harvesting, advertising, or other non-essential tracking purposes. Please see the link to our cookies banner here for further details [[LINK TO COOKIES BANNER](#)].

We may obtain your personal data from the following sources:

- **Indirectly such as:**
 - (a) analytics providers;
 - (b) advertising networks;
 - (c) search information providers;
 - (d) providers of technical, payment and delivery services;
 - (e) data brokers or aggregators;
 - (f) providers of social media platforms (including but not limited to platforms such as X, Facebook (Meta), TikTok, LinkedIn, and Instagram) for example where you share our content through social media, for example by liking us on X, Facebook, LinkedIn, TikTok or by following or posting about us on any social media platform;

- **From publicly available sources**, such as:
 - (a) Companies House; and
 - (b) the electoral roll.

5 HOW WE USE YOUR PERSONAL DATA

The law requires us to have a lawful basis to process your personal data.

Where we may rely on consent

For certain purposes it may be appropriate for us to obtain your prior consent. The legal basis of consent is only used by us in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way.

In the event that we rely on your consent, you may at any time withdraw the specific consent you give to our processing your personal data. Please contact us using the contact details set out in paragraph 2 to do so. Please note even if you withdraw consent for us to use your personal data for a particular purpose we may continue to rely on other lawful bases to process your personal data for other purposes.

Other legal bases we may rely on

Where we are relying on a basis other than your consent, the lawful basis for processing personal data will be one of the following:

- a) the processing is necessary in order for us to comply with our **legal obligations** (such as compliance with anti-money laundering legislation);
- b) the processing is necessary for the **performance of a contract** you are party to or in order to take steps at your request prior to you entering into a contract;
- c) processing is necessary for the establishment, exercise or defence of **legal claims**;
- d) the processing is necessary for the pursuit of our **legitimate interests**;
- e) the processing is necessary for the purpose of a **recognised legitimate interest** (for example crime prevention, in the national or public interest);
- f) the processing is necessary in order to protect the **vital interests** of an individual e.g. where there is a medical emergency at one of our premises;
- g) the processing is necessary for the performance of a task carried out in the **public interest**.

Extra conditions for special category personal data

Where we are processing your special category personal data one of the following conditions will also apply:

- a) you have given your **explicit consent** to the processing;
- b) the processing relates to personal data which are **manifestly made public** by you;
- c) the processing is necessary for the **establishment, exercise or defence of legal claims**;
- d) the processing is necessary for **archiving** purposes in the public interest; **scientific or historical research purposes or statistical purposes**;
- e) the processing is necessary to protect an individual's **vital interests** where the individual cannot give consent;
- f) the processing is necessary for reasons of **substantial public interest**;
- g) processing is necessary in relation to your or our rights in the field of **employment and social security and social protection law**;
- h) processing is necessary for reasons of **public interest in the area of public health**.

6 PURPOSES FOR WHICH WE USE YOUR PERSONAL DATA AND THE LAWFUL BASIS

Our processing of your personal data will depend on our relationship with you. The table below sets out in more detail the purpose of the processing activities and which of the lawful basis we rely on to do so. We have also identified what our legitimate interests are where appropriate. We have also identified what our legitimate interests (which includes recognised legitimate interests) where appropriate.

Purpose	Processing Operation	Lawful basis relied on under data protection laws (as relevant and applicable)	Relevant Categories of personal data
Performing our contractual obligations to you	Processing and performing any order placed by you for goods or services	Processing is necessary: - for the performance of a contract with you - in connection with our legitimate interests in carrying out our business and managing our relationship with you	Individual Data Economic and Financial Data Account and Profile Data
	Considering feedback and complaints that	Processing is necessary:	Individual Data

	you may make to us including dealing with refunds	• for the performance of a contract with you • in connection with our legitimate interests in carrying out our business and managing our relationship with you • vital interests	Economic and Financial Data Account and Profile Data
	Making or receiving payments, fees and charges	Processing is necessary: • for the performance of a contract with you • in connection with our business interests in carrying out our business and managing our relationship with you	Individual Data Economic and Financial Data Account and Profile Data
	Collecting and recovering money owed	Processing is necessary: • for the performance of a contract with you • in connection with our legitimate interests in carrying out our business and managing our relationship with you	Individual Data Economic and Financial Data Account and Profile Data
Managing our relationship with you	Sending you important notices such as communications about changes to our terms and conditions and policies (including this Privacy Notice)	Processing is necessary: • for the performance of a contract with you • for compliance with a legal obligation to which we are subject • in connection with our legitimate interests in carrying out our business	Individual Data Account and Profile Data

		and managing our relationship with you	
	Providing advice regarding our products and services to you (or arrange for others to do so at our request)	Processing is necessary: • for the performance of a contract with you • in connection with our legitimate interests in carrying out our business and managing our relationship with you	Individual Data Advertising Data Market Research Data
	Sending you information you have requested	Processing is necessary: • for the performance of a contract with you • for compliance with a legal obligation to which we are subject • in connection with our legitimate interests in carrying out our business and managing our relationship with you	Individual Data Advertising Data Information Technology Data Account and Profile Data Sales Data Market Research Data, in each case as relevant and/or required by applicable law
	Dealing with your enquiries	Processing is necessary: • for the performance of a contract with you • for compliance with a legal obligation to which we are subject • in connection with our legitimate interests in carrying out our business and managing our relationship with you	Individual Data Account and Profile Data Sales Data Economic and Financial Data
	Making suggestions and	Processing is necessary:	Individual Data

	recommendations to you about vacancies that may be of interest to you, deliver relevant Platform content and advertisements to you and to measure or understand the effectiveness of our advertising. We may also undertake profiling in order to protect your interests and personalise recommendations.	• in connection with our legitimate interests in carrying out our business and managing our relationship with you • Or where you have provided us with your consent	Advertising Data Information Technology Data Account and Profile Data Sales Data
	Communicating with you about, and administering your participation in, special events, programmes, promotions, any prize draws or competitions.	Processing is necessary: • for the performance of a contract with you • in connection with our legitimate interests in carrying out our business and managing our relationship with you • where you have provided us with your consent	Individual Data Advertising Data Information Technology Data Account and Profile Data
	For internal purposes to use data analytics, to identify usage trends, determine and measure the effectiveness of promotional campaigns and advertising and	Processing is necessary: • for the performance of a contract with you • in connection with our legitimate interests in carrying out our business and managing our relationship with you	Individual Data Advertising Data Information Technology Data Account and Profile Data Sales Data

	to improve our Platform, products/services , marketing, customer relationships and experiences		
Administering our business and carrying out business activities	This may involve a variety of processing operations relating to the running of our business, including those set out below:	Processing is necessary: • in connection with our legitimate interests in carrying out our business and managing our relationship with you	Individual Data Advertising Data Information Technology Data Account and Profile Data Sales Data Market Research Data
Administering our business and carrying out business activities	Protecting our business including to deal with any misuse of our Platform and to comply with our security policies at our locations	Processing is necessary: • in connection with our legitimate interests in carrying out our business and managing our relationship with you • for compliance with a legal obligation to which we are subject	Individual Data Information Technology Data Account and Profile Data
	Using your personal data to comply with our own legal obligations and maintaining our records	Processing is necessary: • in connection with our legitimate interests in carrying out our business and managing our relationship with you • for compliance with a legal obligation to which we are subject • vital interests	Individual Data Economic and Financial Data Account and Profile Data Sales Data
	Enforcing or applying our terms of use,	Processing is necessary:	Individual Data

	terms and conditions of supply and other agreements with third parties for the purposes of debt recovery	• for the performance of a contract with you • in connection with our legitimate interests in carrying out our business and managing our relationship with you • for compliance with a legal obligation to which we are subject	Economic and Financial Data Account and Profile Data Sales Data
	Detecting and preventing fraud and other illegal activities (and to assist regulators, trade bodies and law enforcement agencies in relation to the same)	Processing is necessary: • for the performance of a contract with you • in connection with our legitimate interests in carrying out our business and managing our relationship with you • for compliance with a legal obligation to which we are subject • vital interest of a person • for the performance of a contract with you	Individual Data Information Technology Data Economic and Financial Data Account and Profile Data Sales Data
	Reorganisation, restructuring, refinancing, selling, making ready for sale or disposal of our business in whole or in part including to any potential buyer or their advisers	Processing is necessary: • in connection with our legitimate interests in carrying out our business and managing our relationship with you	Individual Data Advertising Data Information Technology Data Account and Profile Data Sales Data Market Research Data

	Investigating and defending any third party claims or allegations	Processing is necessary: • for the performance of a contract with you • in connection with our legitimate interests in carrying out our business and managing our relationship with you • for compliance with a legal obligation to which we are subject • vital interests	Individual Data Sales Data Economic and Financial Data
	Providing administration and / or IT services Seeking to ensure the security of our IT network	Processing is necessary • in connection with our legitimate interests in carrying out our business and managing our relationship with you	Individual Data Advertising Data Information Technology Data Account and Profile Data Sales Data Market Research Data
	The development of our business strategy Studying how to develop and the updating of our products and services;	Processing is necessary • in connection with our legitimate interests in carrying out our business and managing our relationship with you	Individual Data Advertising Data Information Technology Data Account and Profile Data Sales Data Market Research Data
	Protecting our business and property	Processing is necessary • in connection with our legitimate	Individual Data Information Technology Data

		interests in carrying out our business	
Public Task Disclosures	Sharing information with public bodies or those carrying out public tasks when requested Protecting our staff	Processing is necessary: • in connection with our legitimate interests in carrying out our business • vital interest of a person	Individual data Health Data
Safeguarding Public Task Disclosures	Processing vulnerable individuals (both minors and at-risk adults) from harm or neglect Sharing information with public bodies or those carrying out public tasks when requested	Processing is necessary: • in connection with our legitimate interests in carrying out our business • vital interest of a person	Individual data Health data
Safeguarding	Processing vulnerable individuals (both minors and at-risk adults) from harm or neglect	Processing is necessary: • in connection with our legitimate interests in carrying out our business • vital interest of a person	Individual data Health data
Crime	Safeguarding national security, preventing, detecting or investigating crimes or prosecuting offenders	Processing is necessary: • in connection with our legitimate interests in carrying out our business • vital interest if a person • for compliance with a legal obligation to which we are subject	Individual data Individual data

Security and Defence	Dealing with emergency situations that threaten human welfare, the environment, or national security	Processing is necessary: • in connection with our legitimate interests in carrying out our business • for compliance with a legal obligation to which we are subject • vital interests	Individual data Health data
Emergencies	Dealing with emergency situations that threaten human welfare, the environment, or national security	Processing is necessary: • In connection with our legitimate interests in carrying out our business • Vital interests	Individual data Health data

7 WHO RECEIVES YOUR PERSONAL DATA

We may disclose, from time to time, your personal data to:

- third party data processors who may process data on our behalf to enable us to carry out our usual business practices. Any such disclosure will only be so that we can process your personal data for the purposes set out in this Privacy Notice;
- third parties operating plugins or serving up content (such as LinkedIn) which you choose to interact with. In some of those cases we and that third party may have determined that we are jointly processing your personal data, for example in relation to relevant job vacancies. In those cases, we will enter into an appropriate joint controller agreement. In other cases that third party may be a separate controller. No such agreements are currently in place;
- HMRC, legal and other regulators or authorities, including those who request your personal data or to report any potential or actual breach of applicable law or regulation;
- external professional advisers such as accountants, bankers, insurers, auditors and lawyers;
- law enforcement agencies, courts or other relevant party, to the extent necessary for the establishment, exercise or defence of legal rights;
- third parties where necessary for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties; and
- third parties which are considering or have decided to acquire some or all of our assets or shares, merge with us or to whom we may transfer our business (including in the event of a reorganisation, dissolution or liquidation).

8 ACCURACY OF YOUR PERSONAL DATA

It is important that the personal data we hold about you is accurate and current and we take all reasonable precautions to ensure that this is the case but we do not undertake to check or verify the accuracy of personal data provided by you. Please keep us informed if your personal data changes during your relationship with us either by logging onto your account on the Platform or by contacting us. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

9 INTERNATIONAL TRANSFERS OF PERSONAL DATA

It is possible that personal data we collect from you may be transferred, stored and/or processed outside the United Kingdom including outside the European Economic Area.

In connection with such transfers we will ensure that:

- a) there are appropriate safeguards in place such as binding corporate rules or approved model contractual clauses; or
- b) the transfer is to a country that provides an adequate or equivalent level of protection; or
- c) one of the derogations for specific situations applies to the transfer including explicit consent or necessary for the performance of a contract or exercise or defence of legal claims.

10 HOW LONG WE WILL STORE YOUR PERSONAL DATA FOR

We will store your personal data for the time period which is appropriate in accordance with the following criteria:

- (a) the on-going business operation / relationship that we have with you;
- (b) the completion of the purpose for which the personal data was given;
- (c) our legal obligations in relation to that personal data and other legal requirements;
- (d) the type and size of the data held and whether any if it is deemed to be special category personal data; or
- (e) our accounting requirements in relation to that personal data.

We keep the length of time that we hold your personal data for under review. These reviews take place annually.

11 CONTRACTUAL OR STATUTORY REQUIREMENTS ON YOU TO PROVIDE PERSONAL DATA

In certain circumstances the provision of personal data by you is a requirement to comply with the law or a contract, or necessary to enter into a contract.

It is your choice as to whether you provide us with your personal data necessary to enter into a contract or as part of a contractual requirement. If you do not provide your personal data then the consequences of failing to provide your personal data are that we may not be able to perform to the level you expect under our contract with you. An example of this would be where

we are unable to offer you certain Platform functionality as we do not have your full details, or where we cannot perform our contract with you at all because we rely on the personal data you provide in order to do so.

12 **USING NEW AND NOVEL TECHNOLOGIES**

We may use generative artificial intelligence tools for reasons such as, but not limited to, improving the operation and efficiency of the service provided to you. These tools assist us with a variety of work including selecting which vacancies are best suited to you and profiling your data to provide an effective service.

We rely on our legitimate interest as our lawful basis should we process any personal data, either directly or incidentally, these tools either in the course of the delivery of our services or in the operation of our business.

13 **AUTOMATED DECISION MAKING**

We use automated decision-making tools in our processing of your personal data. This includes (but is not limited to) the application of profiling techniques to your personal data. We may use these tools to direct you, for example, to vacancies that best suit your profile/preferences.

We will provide you with information about the decision, including the logic involved, the main factors/criteria used in the decision-making, and the significance and envisaged consequences for you, as deemed necessary/appropriate or when expressly requested by you.

You also have the right to:

- request human intervention in the decision-making process;
- express your view and make representations about the decision; and
- contest the decision.

To exercise these rights, contact contact@lios.uk.

Automated decision-making based on special category data (which covers any of the following: data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership; data concerning sex life, sexual orientation or health; biometric data for purpose of uniquely identifying a natural person; or genetic data) is subject to additional restrictions and is only allowed under specific conditions, for example, with explicit consent.

When ADM is used, you must be informed when we first communicate with you of the existence of this ADM, meaningful information about the logic involved and the significance and envisaged consequences for you.

14 YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

Subject to applicable law including relevant data protection laws, in addition to your ability to withdraw any consent you have given to our processing your personal data (see paragraph 5), you may have a number of rights in connection with the processing of your personal data, including:

- the right to request access to your personal data that we process or control;
- the right to request rectification of any inaccuracies in your personal data or, taking into account the purposes of our processing, to request that incomplete data is completed;
- the right to request, on legitimate grounds as specified in law:
 - (a) erasure of your personal data that we process or control; or
 - (b) restriction of processing of your personal data that we process or control;
- the right to object, on legitimate grounds as specified in law, to the processing of your personal data;
- the right to receive your personal data in a structured, commonly used and machine-readable format and to have your personal data transferred to another controller, to the extent applicable in law; and
- the right to lodge complaints regarding the processing of your personal data with us and if you are still dissatisfied, with the Information Commissioner's Office or equivalent. Please see <https://ico.org.uk/concerns/> for how to do this.

If you would like to exercise any of the rights set out above, please contact us using the contact details set out in paragraph 2.

15 LINKS TO OTHER WEBSITES/APPS

This policy only applies to us. If you link to another website/app from our website/app, you should remember to read and understand that website's/app's privacy policy as well. We do not control unconnected third party websites/apps and are not responsible for any use of your personal data that is made by unconnected third party websites.