tecknuovo

Privacy Notice

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Tecknuovo

Privacy Notice

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About us

We are Tecknuovo Limited, a registered company in England under company number 9611416 with our registered offices at 20-22 Wenlock Road, London, N1 7GU.

Our services

We are a technology delivery partner that specialises in the DevOps, Cloud and Open-Source space. We act as a specialist service provider in the provision of consultancy and project services to both public and private sector clients. We are registered with the Information Commissioner Office (ICO) with registration number ZA127396.

Our role as controller or processor

For the processing described in this privacy notice, Tecknuovo is usually the controller where we decide why and how personal data is used. This includes our own recruitment, consultant-network, supplier, client-contact, website, CCTV, contract-management, HR, finance and business-administration activities.

Where we deliver services to a client and process personal data only on that client's documented instructions, Tecknuovo may act as a processor or sub-processor for that client. In those circumstances, the client is responsible for providing privacy information about its own processing unless otherwise agreed.

Our consultants, suppliers and partners may also act as processors or sub-processors where they process personal data on Tecknuovo's or a client's instructions. We require appropriate contractual, confidentiality, security and data-protection controls where this applies.

How to contact us

If you have any queries or questions about this privacy notice, please contact our Data Protection Officer, at compliance@tecknuovo.com or you may call us on 0203 805 7799.

Should you wish to contact us more formally to exercise any of your rights in law or to request information about our use of your personal information please refer to Your Rights and How to Complain and Contact Us-Your Rights below.

Which privacy notice applies to you?

This is Tecknuovo's main privacy notice. It explains how we process personal data in connection with our website, consultancy services, client relationships, supplier relationships, partner relationships, consultant network, referrals, referees and related business operations.

Some categories of individual are also covered by more specific privacy notices. Where one of the notices below applies to you, please read it alongside this main privacy notice:

- Employee candidates and people who connect with us about internal employment roles: please read our Team Tailor recruitment privacy notice.
- Project-role candidates, consultants and individuals who register interest in consultancy or contractor opportunities through Pinpoint: please read our Pinpoint candidate and consultant-network privacy notice.
- Current and former employees, workers and directly engaged staff: please read our staff privacy notice which can be viewed on Bamboo HRIS.
- Office visitors and staff attending our premises: If you attend our office at 6 St Andrew Street, London EC4A 3AE, your image may be captured by CCTV systems operating at access points on the 5th floor. CCTV is used for safety, security, asset protection, health and safety, and prevention or investigation of crime or serious incidents. Further information is provided in our CCTV privacy notice, including access controls, disclosure controls and retention periods.
- Participants in Microsoft Teams meetings that are recorded or transcribed: please read our meeting recording and transcription privacy notice. Recording and transcription retention periods are detailed within the Meeting Recording and Transcription Privacy Notice and our Records Retention Schedule.

This privacy notice should be read as Tecknuovo's core privacy notice. The specialist notices identified supplement the core privacy notice for specific processing activities and can be found on our privacy policy page of our website.

Personal Information

Any information we hold about you (whether manually or electronically in a relevant filing system) and which identifies you as an individual (personal data under the UK General Data Protection Regulations (UK GDPR) may only be used by us in accordance with the requirements of the UK GDPR. If we use particularly sensitive personal data about you (special categories of data under UK GDPR) or we use personal data relating to criminal convictions and offences, we will comply with the additional requirements set out in Article 9 of the UK GDPR and the Data Protection Act 2018. Special categories of data include data which reveals racial/ethnic origin, religious/political views, health, and sex life/orientation.

When we refer to your "personal information" in this privacy notice, we refer to personal data and special categories of data as defined in UK GDPR.

Whose personal information do we collect and use

We collect, use, and store personal information in respect the following types of individuals:

Consultants

- Individuals who support Tecknuovo in the delivery of its Consultancy Services. (i.e., independent contractors, consultants, and sub-contractors)

Client Contacts

- Individuals within our customer organisations that we communicate with in relation to our Consultancy Services including but not limited to corporate stakeholders, account managers, project leads, and other key contacts for our Consultancy Services.

Partner Contacts

- Individuals within consultancy organisations who partner with us to deliver Consultancy Services for projects for our customers and whether under a consortium, joint venture, joint bidding, or other collaboration.

Supplier Contacts

- Individuals within organisations who deliver support services and business services to us to maintain our infrastructure and operations.

Referees

- Professional or personal referees whom our Consultants, Suppliers, Partners may provide to us for Tecknuovo to verify their professional credentials.

Referrals

- Friends, colleagues, and other contacts of any Consultant, Client, Partner, Supplier who are referred to us to contact in relation to our Consultancy Services.

Website Users

- Individuals who access our website and whether or not they are individuals within any of the above categories.

When we refer to your "personal information" in this privacy notice, we refer to personal data and special categories of data as defined in UK GDPR.

Personal information we may collect

Consultants

We may collect and process a range of personal information about you, whether obtained directly from you or obtained from a third-party source, and which includes but is not limited to contact details, work and employment history, education, and professional qualifications that we believe are relevant assess your suitability to be engaged to support us on our projects, to administer any contract with you, and comply with our legal obligations. We may collect the following personal information from you:

Consultant Personal Information Table

Type of Personal Information	Details	Source: Consultant	Source: Third party	Reason for collection

Contact	Name, address, email address, telephone number, mobile number, emergency contact details, next of kin details	CV Interview Service Communications	Job Boards Networking Sites	To assess your suitability for our projects we require additional technical support on.
Employment	• Previous projects and roles worked in • Details of prior projects and roles • Employer's details/customer details • Dates of engagement/ employment • Salary and Remuneration • Career aspirations • Work/professional references			To undertake pre-screening checks as a condition of working with us To allow us to identify you and contact you for future projects we require technical support on.
Education/ Training	• Information on schools/ colleges/ university attended and types of exams taken and grades. • Other training courses undertaken and grades			To keep you informed about projects we may have in the future which may of interest to you.
Professional Qualifications	Details of professional qualification held			
Social Activity/ Interests	Outside interests, hobbies, likes, dislikes, family interests			
Professional Body registrations and accreditations	Details of any professional memberships or memberships of professional bodies		• Job boards • Networking sites • Professional body • Background Screening • Service Provider	To administer any contractual arrangements, we enter into for the delivery of consultancy services to support Tecknuovo.
Personal Qualities/Skills/ Behaviour Characteristics	information about your personal attributes, your personal skills, ability to lead, ability to work in a team, and other information from answers provided to competency based questions, psychometric test questions, personality test questions and skills testing personal references.		• Psychometric testing and assessment service providers • External skills testing service providers	

			• Service Communications	
Health Information	Any health conditions, sickness information, vaccination information (including Covid-19 passport) medical conditions, medical information provided in medical questionnaires, information relating to pregnancy and or maternity, assessment of a PAYE worker's working capacity, subject to confidentiality safeguards, and any information on disabilities.			To ensure that we comply with obligations under the Equality Act 2010; to support and explain gaps in your employment history; to ensure we and our Client may comply with health and safety legislation.
Criminal Convictions/ Offences	UK: Unspent criminal convictions Spent Convictions (where more enhanced DBS check is required by us for a project) Overseas: Police clearance certificate, criminal records certificate, certificate of good standing or such other official criminal convictions certificates issued by the country of origin.		UK: Disclosure Barring Service (DBS) Background Screening Service Provider Overseas: Police or such other authority authorised by the state to issue criminal convictions information	We require disclosure of unspent criminal convictions to assess suitability for projects. To ensure we comply with any legal requirement to conduct a DBS check.
Identity	Evidence of ID confirmed by production of copies of documents, usually 2 from list; Passport or photo driving licence, other photo ID, birth certificate. Proof of address; utility bill, bank/building society statement, council tax bill.	Service Communications	• Background screening • Service provider • Networking sites	To ensure that you are who you state you are; to ensure that we prove identity of data subject upon receipt of subject access request
Images	Photograph (whether digital or not)			To assist us in remembering you when providing services; to assist us in confirming your identity; to prepare building passes or other ID badges for attendance at project sites.
Meeting recordings and transcription data	Audio and/or video recordings, automated transcripts, speaker names, participant names, meeting title, meeting date and time, meeting duration, chat	Directly from meeting participants and from Microsoft		To maintain an accurate record of customer, project, consultant and internal meetings; record decisions, actions; manage service communications;

	messages, shared-screen content and any personal data included in what participants say, show or share during a recorded or transcribed meeting.	Teams meeting metadata.		updates on relevant project, CRM or business records; and to support service quality and continuous improvement.
Right to Work	Confirmation of whether you have a right to work and basis of such right; evidence of ability to work legally in the UK; copy of passport or 2 documents from Home Office list of documents and physical sight of passport required to comply with defence requirement, EU settlement status, visa, permit, and or sponsorship visa information.			To ensure that you have a legal right to work in the UK in accordance with immigration legislation when delivering consultancy services to us.
Credit Reference (adverse financial check)	Confirmation that you have no adverse credit history including any, bankruptcy, and or voluntary or involuntary arrangements for creditors where we require this for a project.	Service communications	• Background screening • Service provider • Credit reference agency	To assess your suitability for projects.
CIFAS Check (Fraud check)	Confirmation that you have not been involved in fraudulent activity	Service Communications	• CIFAS • Background screening • Service provider	To assess your suitability for projects.
Service Communications	Letters, emails, phone calls, texts, and other electronic communications between us in the course of our discussions regarding projects, during our pre-screening process, during our project on-boarding process, during any project, and upon completion of any project.			To administer our consultancy services.
Service evaluation	Feedback provided by Tecknuovo personnel and/or obtained from any customer in relation to quality of services delivered for a project.	Service communications	• Tecknuovo personnel • Client personnel	To monitor and maintain quality of and standards in our delivery of the Consultancy Services.
Special Categories of Data	Health Information, Images, Equal Opportunities	CV, Application Form, Equal opportunity monitoring form, Service Communications, interview notes		See defined category sections for more information

Finance, Tax & Social Security	NI number, tax code, data of birth, P45, P60, payslips, gender, marital/civil partner status, dependants, and any other personal information required to be maintained with HMRC, and/or any HMRC correspondence relating to tax and social security, information relating to HMRC employment status check and/or Off-Payroll Rules/IR35 status check or review, details of your interest in and connection with any person through whom you intend to supply services to us	Service Communications HMRC Employment Status Check	HMRC Off-Payroll Rules status determination IR35 review service provider	To pay you for services delivered under a contract; To issue you remittance for work; To deduct statutory tax and NI contributions from payments due to you (where applicable); to file relevant reports to HMRC; and to comply with ITEPA 2003 and ancillary legislation.
Equal Opportunities	Diversity and equal-opportunities information, which may include special-category data such as racial or ethnic origin, sex, sexual orientation, disability or health-related information, religious or philosophical belief, and other diversity information where collected.	Equal Opportunity Monitoring Form	Equal opportunities monitoring PinPoint	Equal opportunities, diversity and inclusion monitoring, including monitoring our candidate pipeline, consultant network, recruitment outcomes, project-role participation and, where relevant, public-sector customer or contractual reporting requirements. See defined category sections for more information
Remuneration	Salary and or income details, fee rates, contractual benefits, and other remuneration; relating to past and current projects, and new or potential projects offered to you.	Service Communications		To discuss and agree appropriate fee rates for your support on our projects.
Technical Data	Your internet protocol (IP) address, MAC address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, mobile phone location data and other technology on the devices you use to access our website and our services.		• Our website • Analytics • Service Providers	To ensure we provide you with the best experience on our website and to improve our customer service and to make the way we operate more useful to you (which includes tailoring our website to suit your requirements better.)
Usage Data	Information on how you use and navigate around our website and what you browse within them and information of your contact with us via our website.		• Our website analytics • Service providers	

In respect of our communications with you and the delivery of our consultancy services, we may obtain personal information from you arising from:

- Your use of our website (please see our website terms and conditions and cookie policy for more information)
- Applications you make for projects we advertise (via our website or via a job board)
- Your attendance at any networking event we host or sponsor
- Your attendance at any business fair we are promoting our Consultancy Services
- When you correspond with us via phone, email, video conference, or through any text or email messaging service

We may obtain personal information about you from third party sources:

- Job boards
- Our website
- Networking Sites (any professional and or social networking site where you have uploaded or published personal information to)
- Referrals – a personal or professional recommendation from a third party (typically a family member, friend, colleague, or former employer)
- Intermediary – any party who you supply your services through

We may collect further personal information about you in anticipation of or as part of ongoing compliance in the delivery of our Consultancy Services from third-party sources referred to in the Consultant Personal Information Table.

If you do not give personal information

We may need to collect personal information by law in certain circumstances. If
you choose not to give us this personal information, it may delay or prevent us from engaging with you regarding your consultancy services and/or progress a project if we cannot comply with the law.

If you choose not to give us information that we require to undertake our assessment of your suitability for our projects, we may not be able to continue our discussions with you regarding a project or otherwise continue to administer a contract for an existing project. We will advise you of the implications of not giving us information at the time we request it.

Client, Supplier, and Partner Contacts

We may collect and process personal information about you and which will typically include Contact details and Service Communications. We will only collect such personal information either directly from you as a consequence of our

communications with you, indirectly during service negotiations with you, during service communications (including during recording and or transcription of Teams meetings) indirectly from the contract with you, or indirectly from a Networking Site. We may use such personal information to contact you to discuss our services with you now and in the future, to deliver our Consultancy Services to you, to discuss your services with us, to perform our obligations or your obligations under a contract with you, and to keep in touch with you regarding future projects.

As a Supplier or Partner, we may undertake suitability checks on you to assess your suitability to deliver services to us. In this respect we may undertake such checks as we would conduct on Consultants as identified in the Consultant Personal Information Table.

Referrals

We may collect and process personal information relating to Contact details for Referrals who are provided to us by any Client, Supplier, Consultant or Partner.

We may receive personal information about you directly from the individual who referred you or from a Job Board or profile for a Networking Site that you may be subscribed to. We will only use such personal information to contact you as a direct consequence of you being referred to us. We will typically ask the person referring you to confirm that you are willing to be contacted by us or in the alternative we will ask the person referring you to introduce you to us. If you express an interest in discussing a project or services with us now or in the future as a consequence of our contact with you as a Referral, we will retain your Contact details for this purpose and in accordance with our retention policy below.

If you are not interested in discussing projects or services with us and confirm that you do not wish to receive further communications from us (following referral) we will not retain your personal information.

Referees

We may collect and process personal information relating to Contact details for Referees who are provided to us by a Consultant, Supplier or Partner for business reference or employment reference purposes. We will only collect such information directly from the above persons. We will only use such Contact details to the extent that we require a professional reference for a particular project we are discussing with you.

Website Users

We may collect personal information via our third-party service providers, such as Google Analytics and various job boards. As you use our websites, we may automatically collect your Technical Data and or Usage Data. We collect this personal data by using cookies, server logs and other similar technologies. Please see our Cookies Policy for further details.

How personal information is protected

Under UK GDPR, we are only able to use personal information for specific reasons and always provided we are using personal information fairly and we have advised you of our use.

We must have a legal basis to process your personal information. The legal bases we rely upon to offer our work-finding services to you are:

- Where we have a legitimate interest (LI)
- Where we have a recognised legitimate interest (RLI)
- To comply with a legal obligation that we have (Legal Obligations)
- To fulfil a contractual obligation that we may have with you (Contract Necessity)
- You consent to our processing (Consent) - We may rely upon your consent where no other lawful basis is appropriate. Where we rely upon consent, this will be explained separately at the point consent is requested

Where personal information we collect is considered to be a special category of data or data relating to criminal convictions and or offences (which are considered more sensitive personal information), there are additional requirements that we must fulfil. We will not collect or use more sensitive personal information without your consent unless the law allows us to do so. If we do seek to collect and or use such information, it will usually only be when it is necessary and for one of the following reasons:

- We are required to comply with or exercise our rights in the field of employment laws (Employment Law Obligations);
- It is for reasons of substantial public interest in compliance with the Data Protection Act 2018 (SBT);
- It is in the interests of public health in compliance with the Data Protection Act 2018 (Public Health);
- It is to establish, exercise or defend legal claims and or to seek legal advice in respect of any potential or existing legal claim (Legal Claims); or
- We obtain your explicit consent to our processing (Explicit Consent)

Our processing activities – Consultants

We will use your personal information to:

- Maintain your Contact details and other personal information in our CRM to discuss future co-operation and participation in projects (RLI)
- Assess your suitability for projects which you are interested in supplying consultancy services for (LI)
- Carry out any standard pre-screening and or background checks that we require for projects including but not limited to criminal conviction checks (Legal Obligations) (LI) or (Consent)
- Discuss any potential projects with you (LI)
- Administer and manage contracts for your delivery of consultancy services for a project (RLI) or (Contract Necessity)
- To provide professional/business references on your behalf to third parties who request the same from us (we can only provide this for as long as we hold personal information unless you request us retain your personal information for a longer period) (LI)
- Keep you updated in respect of projects you have discussed with us or have shown an interest in and retain details of what projects you have shown interest in (RLI).
- Comply with our legal or regulatory requirements relating to any projects you deliver consultancy service for (including but not limited to compliance with Immigration legislation, Equality Act 2010, and Health and Safety legislation) – (Legal Obligations)
- Share your personal information with third parties where required by law or where necessary in pursuit of our legitimate interests (Legal Obligations) or (RLI) – for more information see Sharing your personal information below.
- We may use your personal information to help us to establish, exercise or defend legal claims and which may include but not be limited to obtaining external advice in respect of any potential or existing legal claims (LI).
- We may use your personal information to help us improve our services (LI)

- Keep a record of your unsuitability for projects where arising due to any misconduct, any act, error, or omission by you, any harassment or any behaviour of a violent, threatening, or intimidating nature towards us, our staff or any third party, any misrepresentation or conveyance of false information by you, or
  your unprofessional behaviour; and which has led to your services having been terminated, or any offer to work for us on a project being withdrawn by us; to ensure that we do not utilise you for future projects (LI).
- Contact you individually regarding a project which we believe will be of interest to you whether by post, email, telephone, and or other electronic means (marketing communication) (RLI).
- Keep you informed of developments in our services that we believe will be of interest to you by post, email, telephone, and or other electronic means (marketing communication) (RLI)
- Ask you for your help in finding Consultants, Suppliers and/or Partners for projects that we have e.g., through a refer a friend promotion by post, email, telephone, and or other electronic means (marketing communication) (RLI)
- Keep you informed about relevant professional information; published salary surveys and industry reports relevant to you, networking events, and other relevant information about the industry sector or your skills sector which we believe may be of interest to you by post, email, telephone, and or other electronic means (marketing communication) (RLI).

Occasionally, we may require your consent from time to time for the collection and processing of personal information for certain processing activities which are not identified above, which will notify you of at the time of such request for personal information.

Recognised Legitimate Interest

The UK GDPR is amended by the Data (Use and Access) Act 2025 (DUAA) to allow for certain types of processing of personal data to be explicitly recognised as examples of "recognised legitimate interests". These apply where the processing of personal data is necessary for specific purposes that are expressly identified as being generally justified, provided that such processing does not override the rights and freedoms of the individuals concerned. Recognised legitimate interests include:

- Direct marketing to existing customers
- Sharing personal data within a corporate group for internal administration
- Network and information security activities (e.g. monitoring network traffic, cyber-security measures).
- We may process your personal information under the basis of recognised legitimate interests. Where we rely on recognised legitimate interests, we ensure the processing is necessary for the relevant purpose and that appropriate safeguards are implemented to protect individuals' rights and freedoms.

Legitimate Interest

We may process your personal information under the basis of legitimate interests as permitted by the UK GDPR. Legitimate interests apply where the processing is necessary for the purposes that we judge to be justified, provided that such processing does not override the rights and freedoms of the individuals concerned.

Use of Images and Visual Data

Images of individuals (such as photographs, CCTV footage, video recordings or any other visual media) are treated as personal data where a person can be identified from the image. We may process images for legitimate interests. If images are processed, we will ensure that our interests do not override your privacy rights.

Processing Your Information

Our processing of your personal information is necessary for us to ascertain your suitability for working with us on our projects. We believe it is important that we have a rounded and informed understanding of your work history, technical and personal skills, and your outside interests in order to achieve this aim.

Our sharing of your personal information with Clients is necessary to ensure the Client's confidence in the quality of our delivery team to deliver the services contracted or outsourced, to allow our Clients to comply with the law, and to allow our Clients to comply with internal security procedures to allow our delivery teams access to their premises and systems to perform our Consultancy Services.

Our assessment of your suitability and completion of our own pre-screening and background checks on you is necessary for us to ensure that you have the technical skills and ability to perform work for us, to mitigate our exposure to claims arising from your negligent performance of the services, and to evidence our compliance with our contractual obligations and warranties under our Client contracts. Such information may be audited to demonstrate to our Client our compliance with such Client contract; all of which are legitimate interests of ours.

We may collect and process personal information relating to you that we would not ordinarily undertake of our own volition, but which we require for a specific project we are delivering Consultancy Services for. This may involve us asking you to comply with additional pre-screening requirements, in addition to those we have already undertaken for our assessment of your suitability and require you to enter into additional contractual obligations where related to projects. We will only require the collection and processing of such personal information where it is necessary for a project (Project Requirements). Our collection and processing of such personal information is necessary for us to comply with our contractual obligations for a project.

We may process personal information relating to Consultants, Suppliers and Partners to administer, perform, and or manage the contract with the Consultant (or any Intermediary) which is in our legitimate business interests and including in particular our ability to process personal information of the Consultants, Suppliers and Partners to terminate our requirement for their services and or to deal with any dispute arising under the contract. To the extent that a Consultant, Supplier and/or a Partner has entered into a personal guarantee and or performance deed with us in respect of project, we shall be entitled to administer, communicate, and threaten and or bring legal proceedings as is necessary to enforce our rights under such contract against such person, which is in our commercial interests.

We may contact you by sending marketing communications about potential projects, our services, and professional information which we believe are relevant to you and would be of interest to you, which is a recognised legitimate interest.

Our continued contact with you now and in the future on this basis is designed to maximise your opportunity of working with us again on future projects; that we continue to have access to a broad range of suitable Consultants for our projects that we may have now and in the future.

We are willing to provide business verification details confirming that you were engaged by us to deliver services on a project if requested by any future customer of yours or any future employer or other person whom you have been advised will seek businesses references and or business verification for the period that we retain your personal information. We are not obliged to provide business references or provide business verification details to you. Should you wish us to retain your information beyond the period we may ordinarily retain your personal information for, you may request us at any time to maintain core employment verification personal information however we will have no obligation to maintain your details beyond the retention period advised.

We will process your personal information where it is in our interests to establish, exercise and or defend legal claims; to seek legal advice in respect of such legal claims (Legal Claims), to prevent criminal acts and or unlawful acts including but not limited to fraud.

Contract Necessity

Our processing on this basis shall only apply to the extent that we may engage Consultants directly as workers or employees. We are required to process certain financial information that you have provided, in order to perform our contract with you and which includes but is not limited to make payments to you after statutory deductions to you and administering statutory entitlements and benefits.

Legal Obligations

Our processing on this basis shall apply to the extent that we are required to process personal information to comply with our obligations under UK laws including but not limited to immigration legislation, legislation covering bribery, modern slavery, criminal facilitation of tax, social security, and payroll legislation in respect of workers and employees, with our obligations for tax intermediary reporting for PSCs, with our obligations to comply with the agency legislation in respect of any Consultants engaged as self-employed, and or applying the Off-Payroll Rules for PSCs.

Such checks may be conducted by a third-party background screening provider (Screening Provider) and in which case the processing of your personal data by such Screening Provider shall be subject to the Screening Provider's own data protection consent form and privacy notice.

Health Information

Prior to an offer of a project: We will only request and process personal information that you provide to us about any disability status to consider whether we need to provide appropriate adjustments during our pre-engagement process, for example where adjustments need to be made during a test or interview for a project. If a project requires us to ascertain your ability to carry out certain duties which are intrinsic to delivering the services under the project, we may require you to provide health information to help us in that assessment during our pre-engagement process.

Post offer of a project**:** We may process health information prior to or during a project, to the extent that we have legal obligations to comply with and which fall within the field of employment law and social security including but not be limited to our obligations under the Equality Act 2010, Health and Safety legislation, and Working Time Regulations 1998.

Covid-19 vaccination status: We may, if required to deliver services at a Client site, require you to provide health information relating to your vaccination status, so that we may comply with any requirements of the Client site. We believe we may process such information on the basis of our compliance with health and safety legislation and/or for reasons of public health.

For the processing of any health information in pursuit of our consultancy services outside of the above reasons, we may rely on grounds set out in the Data Protection Act 2018 or we may seek your Explicit Consent.

Diversity, Equal Opportunities, and Pay-gap analysis

We may use workforce, candidate, consultant-network, remuneration, role, seniority, engagement and diversity information to monitor and improve equality, diversity and inclusion, to understand representation and progression across our business and

consultant ecosystem, and to support gender pay-gap, equality pay-gap or similar reporting where we choose or are required to undertake such reporting.

Where possible, we will use anonymised or aggregated data. Where anonymised reporting is not possible, we will limit identifiable access to those who need it, apply appropriate safeguards, and use the information only for monitoring, reporting and improvement purposes. We will not use diversity-monitoring information to make decisions about whether to appoint, engage, reject or progress an individual. This data will be handled with strict confidentiality and used only for the purposes specified. Where the information is special-category data, we rely on the relevant Article 9 condition and the applicable condition under Schedule 1 of the Data Protection Act 2018 for equality of opportunity or treatment and/or substantial public interest, supported by an appropriate policy document where required.

Screening, vetting and criminal-offence information

Security clearance and customer-mandated screening

For certain roles, projects or engagements, particularly those supporting public sector customers or sensitive environments, we may be required to carry out identity, right-to-work, employment history, background, BPSS, criminal-record or similar checks. Where such checks are required:

· the processing may be necessary to comply with a legal obligation;

· it may be necessary for the performance of a contract or engagement; and/or

· it may be necessary for our legitimate interests in protecting our business and our clients.

Where criminal-conviction data is processed, we will comply with Article 10 UK GDPR and rely on the relevant condition under Schedule 1 of the Data Protection Act 2018, including substantial public interest conditions, and maintain an appropriate policy document where required. These checks are a condition of the relevant role or engagement and may affect whether you can be engaged or deployed.

Tecknuovo screening and suitability checks

We may also carry out proportionate screening and verification activities to assess suitability for engagement, including reference checks, verification of qualifications and experience, and, where appropriate, financial or fraud-prevention checks. These activities are based on our legitimate interests in ensuring quality delivery, protecting our business, managing risk, and maintaining the trust of our clients.

Where such screening involves sensitive or criminal-offence data, we will comply with the applicable legal requirements, including Article 10 UK GDPR and the relevant conditions under the Data Protection Act 2018, and will implement appropriate safeguards.

We will ensure that any such processing is necessary, proportionate and not excessive, and we will not retain this information for longer than necessary.

Our processing activities and reasons for processing - Other Individuals

Client/Supplier/Partner Contacts

We may use personal information to contact you to discuss with you and or market our full range of consultancy services to you or discuss your services to us now and in the future, to administer and deliver relevant services, to perform our obligations and enforce our rights under a contract with you, to keep in touch with regarding developments in services delivered and which we believe will be of benefit to us both, and to manage the commercial relationship with you.

Less commonly, we may need to process your Contact details in the event we are required to comply any legal and or statutory obligations, and or for which we may rely upon grounds relating to our Legal Obligations. We may process your personal information to deal with Legal Claims. We do not collect and or process any sensitive information about you.

Referees

We will only use your Contact details for the purpose of taking up a reference for a Consultant where we determine it necessary in the conduct of our suitability checks.

It is in our legitimate interest to take up references to ensure we are utilising suitably skilled and experienced Consultant and to comply with any contractual warranties under our contracts with our Clients. Less commonly, we may need to process your Contact details in the event we are required to comply any legal and or statutory obligations, and or for which we may rely upon grounds relating to Legal Obligations. We may process your personal information to deal with Legal Claims.

We do not collect and or process any sensitive information about you. Your details may be processed in connection with a contractual or statutory audit where our Consultant records are audited by our Client for compliance purposes. For any processing of your personal information outside of the above processing activities, we will seek your consent.

Referred Consultant

We will only use your Contact details for the purpose of contacting you as a consequence of you being referred to us and in connection with our services.

We have a legitimate interest in ensuring that we identify potential suitable Consultants or projects we are delivering for our Clients. If you wish to be considered for projects, we will retain your details, and you will be considered a Consultant for the purpose of this privacy notice. If you do not wish to register with us, your details will not be retained. Less commonly, we may need to process your Contact details in the event we are required to comply any legal and or statutory obligations, and or for which we may rely upon grounds relating to Legal Obligations.

We may process your personal information to deal with Legal Claims. We do not collect and or process any sensitive information about you.

Website Users

We use a third-party service, Google Analytics, and various job boards to collect standard internet log information and details of visitor behaviour patterns. We use this service to ascertain information such as the number of visitors visiting our website and which individual pages are viewed within our website. Information is processed in a way which does not identify an individual.

We may also enable our website to remember information that changes the way the website behaves or looks, like your preferred language; and whether this relates to our own website or a third-party website which you access through a link from within our website.

We may use personal information to allow us to show you adverts while you are online that are relevant to you.

Systems, suppliers and processors we use

We use a range of systems, suppliers and processors to operate our business, manage recruitment and consultancy opportunities, manage contracts, administer projects, manage resources and timesheets, issue documents for signature, store contracts, support our IT environment and maintain appropriate records.

These include applicant tracking and candidate relationship management systems, contract lifecycle management tools, e-signature platforms, Microsoft 365 and SharePoint, time-recording and resource-management systems, screening providers, finance systems, professional advisers and other IT, hosting, security and support providers.

Some of these systems include artificial intelligence or machine-learning functionality. Where that functionality processes personal information, the controls described under "AI-enabled third-party service providers" below apply.

We maintain a systems and processors schedule that identifies the key categories of systems and suppliers used for relevant processing activities. We review this schedule periodically and when we introduce, replace or materially change a relevant system or supplier.

Storage and access technologies (including cookies)

We use cookies and similar technologies on our website. These technologies allow information to be stored on, or accessed from, your device. They help us operate our website, improve its performance and provide features that enhance your experience. Some cookies are essential for the functioning of our website, while others are used for analytics, personalisation or marketing purposes.

Where required by law, we will ask for your consent before placing non-essential cookies or similar technologies on your device, in accordance with the requirements of the Privacy and Electronic Communications Regulations 2003 (PECR) and the UK GDPR as amended by the DUAA. You can manage your cookie preference at any time using our cookie banner settings tool.

These technologies may store identifiers or device information. They do not normally identify you directly, but they may do so when combined with other data we hold. For more information about the cookies, we use, their purposes, and how you can control or disable them, please see our Cookies Policy.

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

Our Communications

We have clarified our grounds for sending you marketing communications under the DUAA for recognised legitimate interests. Under existing rules on electronic marketing communications, if we wish to send you our marketing communications by electronic means we are either required to obtain your consent to send marketing communications or we may treat you as an existing customer (you are treated as having opted-in to marketing communications). We may rely upon your consent to send you certain marketing communications to you. We may also treat you as an existing customer on the basis that we have had dealings with you with respect to the provision of our services. We only send you marketing communications regarding relevant projects, or otherwise in connection with our services or similar services and provided that you have not opted out of receiving our marketing communications.

Where we send you marketing communications or event invitations by email, we will usually send these communications to you individually or using appropriate mailing-list functionality. In some circumstances, including where we are coordinating an event, networking opportunity, consultant group activity or similar communication involving multiple recipients, we may send an email to more than one recipient at the same time. Where this happens, your email address and any other information visible in the recipient fields may be visible to the other recipients of that email.

We may use cookies for marketing purposes subject to this privacy notice and our Cookies Policy. We do not share your personal information for marketing purposes with any other person and provided you have not opted out of receiving our email marketing communications.

You have the right at any time to opt out of receiving future marketing communications from us or otherwise object to our future marketing communications by emailing us directly. Please see Contact Us – Your Rights for more information.

Automated decision-making

We do not currently make decisions about Consultants, Suppliers, or Partners based solely on automated processing where those decisions have legal effects or similarly significant effects on you. All decisions about engagement involve meaningful human involvement. We may use search functionality within our systems or through our networking sites to help identify suitable Consultants for our projects, but these tools do not make final decisions about engagement.

We may use approved automated tools, including artificial intelligence and machine-learning enabled technology, to assist with transcription, note-taking, summarisation, information retrieval, drafting, search, workflow management and administrative support activities. Depending on the service, this may involve processing communications, documents, recordings, or transcripts, technical or useage information and generated outputs. These tools support our personnel, their outputs are subject to meaningful human review and are not used by us to make solely automated decisions which produce legal or similarly significant effects on individuals.

If we introduce solely automated decision-making in the future, we will update this privacy notice to explain the nature of the processing, the likely consequences for you, and the rights available to you under the UK GDPR and Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025.

Security of your personal information

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

Third-party providers will only process your personal information in accordance with our instructions and upon terms under which 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, and they are subject to a duty of confidentiality.

Consultants – our customers are data controllers in their own right for the purposes of data protection laws, and therefore are required to comply with the requirements of security under UK GDPR. Our terms of business require the Client to comply with the requirements of UK GDPR and they will have their own privacy notice and policy with respect to their own processing of personal information they collect and use. Should you wish to understand what other personal information, if any, they collect about you, and or process outside of our expectations in this privacy notice, or any queries in relation to their processing of your personal information as a data controller you should contact the Client directly.

Our Consultants are data processors to Tecknuovo pursuant to the delivery of their services in support of Tecknuovo projects. Consultants will be required to enter into data processing agreements with Tecknuovo and shall be liable under UK GDPR as a data processor.

Suppliers and Partners may also be data processors and will be required to enter into any appropriate data processing agreement with Tecknuovo in relation to the service provided to Tecknuovo.

AI-enabled third party service providers

Some of our approved third-party service providers use artificial intelligence or machine learning functionality when providing services to us. Where such a provider processes personal information on our behalf:

- it may process prompts, documents, communications, meeting recordings or transcripts, technical or usage information and generated outputs, but only to the extent necessary to provide approved functions such as transcription, summarisation, information retrieval, drafting, search and workflow support;
- it acts as our processor or sub-processor and must process personal information only for specified purposes, under our documented instructions and subject to appropriate confidentiality, security, access-control, retention and deletion requirements;
- we assess whether the provider retains information, uses information to train or improve its models, appoints sub-processors, or processes information outside the United Kingdom or European Economic Area. Where available, we configure or contract with providers so that our inputs are not used to train or improve general-purpose models. Any exception would require separate legal and risk assessment, approval and appropriate transparency; and
- we minimise the personal information made available to the service, use approved tools and configurations, and complete a data protection impact assessment and/or AI impact assessment where required.

AI-generated or AI-assisted outputs are subject to meaningful human review before they are relied upon. These providers are not used to make solely automated decisions about individuals which produce legal or similarly significant effects.

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.

How long we keep your personal information

We will retain your personal information only for as long as is necessary and in accordance with legitimate interests of our Suppliers, Clients, Partners, Consultants, and our own commercial needs to maintain a sustainable and profitable business but subject always to any overriding law which requires us to retain certain information for longer periods.

AI-related prompts, uploaded files, recordings, transcripts, generated outputs and associated audit logs may be retained where they form part of the relevant business record or are required for security, assurance or compliance. They will be retained only for the applicable purpose and period and will then be deleted or anonymised in accordance with our retention schedule and the approved settings for the relevant service.

We believe that it is reasonable and fair that we retain personal information in accordance with the following periods:

Consultants: Enquiries for projects

From the date we record your details for potential projects, we expect to have ongoing discussions and communications with you regarding existing and future projects however those discussions arise, and which may include you being considered for projects and or being interviewed for projects (Project Discussions) and we expect to successfully secure your services on projects. However, we understand that there may be periods during which we have no Project Discussions with you and or we have not been able to engage you for a project, after which time it may be reasonable to expect that your personal information will no longer be of interest or relevance to us and should be deleted.

We will remove your personal information from our CRM and systems if we have not had any Project Discussions with you for more than 6 years since our last Project Discussion, we will remove your personal information from our CRM and systems. We may retain your personal information for a longer period than specified above where we are required to in compliance with any Legal Obligations and or as may be required by us to deal with any Legal Claims as is necessary and in our legitimate interest.

We may retain any personal information (including any sensitive personal information) for any project that you have been considered for (whether or not you have been successful) for a minimum period of 12 months of our consideration to ensure that we may comply with our Legal Obligations and or may establish or defend and or exercise any legal claims as is necessary and in our legitimate interest.

Consultants: On projects

We will retain any personal information collected and used for a particular project for a period of up to 7 years in order to comply with our Legal Obligations, to deal with any Legal Claims, and to reply to any business or employment verification requests received from any new customer, new employer or recruitment agency who requests confirmation of your business services or work history through us. Should you work on a further project for us, and any personal information collected and used for the purpose of your previous project is relevant and valid for processing for the same purposes for the new project, we shall be entitled to use such personal information for the current project.

Client Contacts

We will retain your personal information for as long as we provide Consultancy Services to you and for as long as it may be reasonable and commercially beneficial to us and to you to remain in contact with you for marketing purposes.

Supplier Contracts

We will retain your personal information for as long as we receive services from you and for a period of up to 1 year thereafter.

Partner Contracts

We will retain your personal information for as long as we receive services from you or otherwise collaborate with you in the delivery of the Consultancy Services and for a period of up to 6 years thereafter.

Referees

We will retain your personal information for as long as we hold as Consultant's personal information is held by us in accordance with the above retention period.

Referred Consultants

If you do not wish for us to discuss potential projects with you having contacted you as a consequence of a referral as described in this privacy notice, we will not retain your personal information. If you express an interest in discussing potential projects when we contact you, you will become a Consultant for the purposes of retention.

Website Users

We will retain your personal information for 2 years after your last visit or use of our website or any pages within our website.

Sharing your personal information

Consultants only

We will share personal information that we have collected about you in the provision of our Consultancy Services with:

- Clients and any primary contractor (where Tecknuovo is a sub-contractor on a project) in order that we can arrange access to project sites, secure access to systems (as required), to facilitate project meetings and to administer our contracts with our Clients and with you. For the purposes of this privacy notice, "Client" shall include any primary contractor.
- To a Partner where Tecknuovo collaborates with a Partner on a project and in this circumstance, we will share your personal information with the Partner to the extent required to facilitate project meetings, to ensure the delivery of our Consultancy Services, and to administer our contracts with the Partner, primary contractor, and you. For the purposes of this privacy notice, reference to "Client" shall include any Intermediary.
- Umbrella companies who administer the engagement of and payroll of Consultants who undertake projects for us.
- Our own third-party service providers who deliver services on our behalf and who may process your personal information in the performance of those services under our instruction (subject to agreements with our third-party service providers) and which include but not be limited to our payroll service providers, our background and ID checks service providers, our accountants, our auditors, legal advisors, insurers and IT service and CRM providers.

- Those categories of third-party sources identified in the Consultant Personal Information Table who deliver services to us as we require to deliver our Consultancy Services.

Client/Supplier/Partner

We will share personal information that we have collected about you in the delivery of our Consultancy Services or operation of our business activities with:

- Credit reference agencies where we carry out searches with credit reference agencies in respect of you, if you are a sole trader, any of your shareholders or directors, if you are a company, or your partners if you are a partnership ("the Relevant Persons").
- Fraud protection agencies where we may also check these details for fraud prevention.
- The purpose of the searches and the maintaining of records mentioned above is to assist us or the agencies we use with any one or more of the following purposes:
- Decisions as to credit and related services for the Relevant Persons;
- Decisions on the issue of any insurance policies and on claims under such policies;
- The tracing of debtors, the recovery debt, and the prevention of fraud;
- The confirmation of a person's identity in order to forestall money laundering;
- Statistical analysis of products, credit, insurance, or fraud;
- Training, market research and statistics;
- Credit or financial assessments including, without limitation, the establishment of credit limits for our business with our Clients.

We may also pass information about any Relevant Persons to our financiers, insurers, professional advisers, and others with whom we do business and to any person from whom you may wish to receive a service similar to that provided by us and to any assignee or successor of our Consultancy Services.

Referees

We will share personal information of our Referees with the above persons only to the extent that it is necessary in the performance of our Consultancy Services and to administer our contracts with our Clients.

All

- Our own third-party service providers who deliver services on our behalf and who may process your personal information in the performance of those services under our instruction (subject to agreements with our third-party service providers) and which include but not be limited to our payroll service providers, our background and ID checks service providers, our accountants, our auditors, legal advisors, insurers and IT service and CRM providers.
- Any authority; which may include but is not limited to; central and local government departments, law enforcement and fraud prevention agencies,
  HM Revenue & Customs, Employment Agencies Standards Inspectorate (EASI), Gangmasters Licensing & Abuse Authority (GLAA), and other statutory regulators;
- Any public information sources and third-party organisations that we may use to perform our suitability and checks; including but not limited to the DVLA, Companies House, Disclosure and Barring Service (DBS), and credit reference agencies.

- Any third party whom we instruct to perform audits on our behalf, whether to assess compliance with any statutory duties or as may be required to comply with any contractual commitments that we have.
- Any relevant industry trade body that we may be a member of from time to time.
- Any potential purchaser of our business or the potential owners of any other
- The business we may potentially wish to merge with in the future.
- We will share your personal information with the above third parties where required by law or where we have a legitimate interest in doing so. We have a legitimate interest in:
- complying with our obligations and duties in law
- complying with our obligations under contract with Clients and other third parties
- maintaining our professional accreditations and memberships of professional bodies
- maintaining security and the protection of our IT systems
- assisting authorities in the prevention of crime and fraud
- seeking to prevent criminal acts or other unlawful acts including but not limited to fraud
- notifying authorities in respect of any threat to public security or safety
- assisting the authorities in maintaining national security and protecting public security
- the establishment, defence, and or exercise of legal claims and or the instruction and receipt of legal advice in respect of the same

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes and in accordance with our instructions.

Website Users

Our website and/or services may include links to third party websites, plug-ins, and applications, such as in the form of banner advertisements. Clicking on those links, or enabling those connections, may allow third parties to collect or share personal information about you. We do not control these third parties and are not responsible for their data protection compliance. When you leave our website, or connect to a third party from us, it is your responsibility to familiarise yourself with their privacy policy or notice, as we accept no responsibility for, and have no control over, them or any information or data collected by or for them.

International transfers and overseas access

We primarily process and store personal data in the United Kingdom and/or the European Economic Area (GDPR Zone). However, some of our systems, suppliers, sub-processors, clients, consultants or trusted support personnel may process, access or support personal data from outside the GDPR Zone.

Where personal data is transferred to, or accessed from, a country outside of the GDPR Zone that is not covered by UK adequacy regulations, we will use an appropriate safeguard such as the UK International Data Transfer Agreement (IDTA), the UK Addendum to the EU Standard Contractual Clauses, applicable adequacy arrangements, or another lawful transfer mechanism.

We do not rely on consent for systematic or recurring international transfers. Article 49 derogations are used only in exceptional, limited and non-repetitive circumstances where legally permitted.

Examples of systems and overseas processing - We maintain a published key systems register for logging of processing inside and outside of the GDPR Zone for transparency. You can find the register within the privacy policy page of our website.

Your Rights and How to Complain

Under data protection laws, you have a range of rights which help to protect you in respect of our processing of your personal information. If you are unhappy with how we deal with your request to exercise your rights, or you are unhappy with our response to your request, you may make a complaint to us. You can make a complaint by contacting our Data Protection Officer, at compliance@tecknuovo.com or you may call us on 0203 805 7799. We will acknowledge your complaint within 30 days and will endeavour to investigate and respond to your complaint via email as soon as possible.

If you are not satisfied with our response to your complaint, you may escalate the complaint to the Information Commissioner's Office (ICO) who is the supervisory authority responsible for enforcing data protection laws in the UK. You can contact the ICO by post, by email, telephone, or live chat. The ICO details are:

Tel: 03031231113
Email: casework@ico.org.uk
Mail: ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF We recommend that you read your right to make a complaint at https://ico.org.uk/concerns/.

Your rights in connection with personal information
Under certain circumstances, by law you have the right to:

Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. We may ask you to verify your identity and provide further details to help us respond to your request. We will respond within one month of receiving our request or any additional information needed to confirm your identity or clarify your request. If your request is complex or you have made multiple requests, we may extend this period by up to two further months; if so, we will notify you. We do not generally charge a fee for access requests, but may do so if your request if excessive, or if you request further copies. We may also decline your request for access if we believe that your request is vexatious.

If your request is complex or you have made multiple requests, we may extend the response period by up to a further two months (up to a maximum of three months in total). If an extension is needed, we will notify you and explain the reasoning. Our searches will be reasonable and proportionate to the nature, scope and context of the request. If your request is unclear or too broad, we may ask you to clarify before proceeding.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

However, please note we may not be able to erase certain personal information due to our continuing legal obligations or in other circumstances allowed under data protection laws. We cannot guarantee that you will not be contacted by us following erasure if your personal information remains in the public domain (e.g. if you have published or uploaded information to job boards and Networking Sites) and we suggest that you allow us to retain a personal identifier for our list of individuals we should not contact

in an effort to prevent you being contacted again (if you request this as part of or as a consequence of any request to erase your personal information).

Object to processing of your personal information where we are relying on a recognised legitimate interest or legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. We have a right to reject your request if we decide that our interests in continuing to process your personal information override your interests, rights, and freedoms in certain circumstances.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it. We can only store your personal information during this time and will not delete or otherwise use your personal information, except in relation to Legal Claims, where it is to protect the rights of another person, or it is for reasons of important public interest., or where you have consented to a particular use.

Request the transfer of your personal information to another party (this will only apply to personal information which is processed on the grounds of consent, and which is processed by automated means by us).

Contact Us – Your Rights

If you want to review, verify, correct or request the erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing at compliance@tecknuovo.com.

Right to withdraw your consent

Where you have been asked for consent for processing, you can withdraw your consent at any time. If your consent relates to a particular requirement for a project, you understand that we may not be able to progress our discussions with you about the project concerned. If this is the case, we will let you know. Please note that you can only withdraw your consent to processing activities to which you have consented. You can withdraw your consent by emailing us at compliance@tecknuovo.com.