

## Privacy Statement & Cookies Policy

### Our Privacy Commitment

This privacy statement outlines how we collect, use, store and share your personal data.

**Ven Tex Studio Ltd** (Ventex Studio) is committed to protecting your privacy. We only collect, store and use your personal information for clearly defined purposes, in accordance with the UK General Data Protection Regulation (UK GDPR). This includes both online and offline processing of personal data. We never sell your personal data to third parties. You can contact us at any time to exercise your data protection rights, including access, rectification or erasure of your personal data.

This privacy statement applies to visitors to our website, customers, suppliers, and individuals who apply for roles with Ven Tex Studio Ltd (job applicants and candidates), or one of its Portfolio Companies (companies in which Ven Tex Studio Ltd holds an ownership interest). For recruitment into Portfolio Companies, Ven Tex Studio Ltd acts as data controller; where a joint controller arrangement applies, details will be provided to candidates at the point of application.

### What We Collect

**Personal data** includes:

- Name, email address, phone number, company, job title
- Financial Data (e.g., payment details)
- Technical Data (e.g., IP address, browser type)
- Usage Data (how you interact with our website)
- Marketing preferences and communication data
- Recruitment-related personal data may include contact details, CVs, cover letters, employment history, qualifications, interview notes, assessment outcomes, right-to-work documentation, referee details, and optional equality or health information. We may receive this information directly from you, from recruitment partners, from referees (where applicable), and from publicly available professional sources (e.g., LinkedIn), in line with applicable law. Where we collect your personal data indirectly, we will provide you with this privacy notice at the point of first contact or within one month of collection, in accordance with Article 14 UK GDPR.

### Why We Use It

We use personal data to deliver our services, communicate with you, personalise services, maintain legal and financial records, and prevent misuse.

Recruitment data is used to assess suitability for roles, manage recruitment processes, communicate with candidates, and comply with legal and regulatory obligations.

We store project-related data for the duration of active engagements and retain necessary information for legal and tax purposes for seven years. Where we rely on consent for marketing communications, you can withdraw your consent at any time, and we periodically review our marketing lists.

Recruitment data is retained separately in accordance with the recruitment data retention section below.

## Lawful Bases for Processing

We process your data under the following legal bases:

- **Contractual obligation** – to fulfil or enter into a contract with you
- **Legal obligation** – to meet regulatory and statutory requirements
- **Legitimate interest** – to deliver a high-quality service and build lasting relationships
- **Consent** – for optional communications and newsletter subscriptions

For recruitment we rely on legitimate interests, taking steps at your request prior to entering a contract, and legal obligations. We do not rely on consent to process recruitment data, except where specifically required by law.

**Special Category Data:** During recruitment we may process health or equality data only where legally required or voluntarily provided, with appropriate safeguards and restricted access. Where health information is processed under an employment law obligation, we rely on Article 9(2)(b) UK GDPR. Where equality monitoring data is provided voluntarily, we rely on your explicit consent under Article 9(2)(a) UK GDPR; you may withdraw this consent at any time without affecting your application.

**Automated decision-making:** We do not make decisions about you based solely on automated processing (including profiling) that produce legal or similarly significant effects.

## Sharing Your Data

We may share data with third-party providers such as:

- IT support and hosting services
- Email marketing tools
- Analytics and monitoring tools
- Legal or regulatory bodies, if required

All third parties are contractually bound to handle your data securely and lawfully. We do not permit them to use your data for their own purposes.

**Security:** We use appropriate technical and organisational measures designed to protect personal data, including access controls, secure storage, and supplier due diligence.

Where we transfer personal data outside the UK or EU, we ensure adequate protection through recognised safeguards including the UK International Data Transfer Agreement (IDTA), the UK Addendum to the EU Standard Contractual Clauses, or other equivalent measures. This applies equally to international recruitment-related transfers. Where you are based outside the UK, you may have additional rights under applicable local data protection law. We will take reasonable steps to comply with those obligations where they apply to us.

**Data Breach Notification:** In the event of a personal data breach that is likely to result in a high risk to your rights and freedoms, we will notify you without undue delay, as required under Article 34 UK GDPR.

**Recruitment Data Retention:** Unsuccessful applicant data is normally retained for up to 12 months after the recruitment process unless a different period is required by law or requested by the applicant. Where an applicant is successful, their recruitment data will be transferred to their personnel file and retained in line with our employee data retention policy, a copy of which is available on request.

**Right-to-Work Data:** Right-to-work checks are conducted as a legal obligation under UK immigration law. Documentation collected for this purpose is retained securely for the duration of employment plus two years, in accordance with Home Office guidance, and will not be used for any other purpose.

## Your Rights

You have the right to:

- **Access** the personal data we hold about you
- **Correct** inaccurate or incomplete data
- **Erase** – request erasure of your personal data in certain circumstances, including where it is no longer necessary for the purpose collected, where processing is unlawful, or where you have objected and there is no overriding legitimate interest
- **Complain** to the Information Commissioner's Office (ICO) if you believe your data has not been used lawfully
- **Object** to or **Restrict** our use of your data in certain situations
- **Withdraw consent** at any time for marketing or optional processing
- **Data portability** (in certain circumstances)

These rights apply equally to job applicants and can be exercised at any stage of the recruitment process without prejudice.

## Cookies Policy

Our website uses cookies to:

- Enable key website functionality
- Remember preferences
- Track site performance and usage for analytics

We use:

- **Essential cookies** – for secure access and functionality
- **Preference cookies** – to remember your settings
- **Analytics cookies** – to monitor and improve website use

When you first visit our website, you will be presented with cookie preferences allowing you to consent to or decline non-essential cookies before they are set, in accordance with the UK Privacy and Electronic Communications Regulations (PECR). You can update your preferences at any time via cookie settings. Disabling non-essential cookies may affect your website experience.

## Embedded Content

Some pages may contain embedded media (e.g., videos or social media posts). These third-party sites may collect usage data independently. Please refer to their privacy policies.

## Complaints & Contact

We aim to resolve all privacy concerns internally. For data protection queries or to exercise your rights, please contact our designated data protection contact at [enquiries@ventex.studio](mailto:enquiries@ventex.studio). If you remain unsatisfied, you may escalate to the UK's Information Commissioner's Office (ICO):

- Online: <https://ico.org.uk/global/contact-us/>
- Phone: 0303 123 1113
- Post: ICO, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

## Ven Tex Studio Ltd.

Registered in Scotland: SC798489 | ICO Registration No: ZC136557

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