



**Head  
Light**

# Privacy Policy

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Talent **Cloud®**. Breakthrough **software**. Raise **expectations**.



We at Head Light (Head Light Limited) are committed to protecting your privacy.

This Privacy Policy governs our data collection, processing and usage practices. It also describes your choices regarding use, access and correction of your personal information. By using the Website, providing your Personal Information via our online content and marketing forms, or giving us your details as part of a sales discussion, you consent to the data practices described in this Privacy Policy. If you do not agree with the data practices described in this Privacy Policy, you should not use the Website or access our content by completing a form to access our collateral (the Subscription Service).

We periodically update this Privacy Policy and you should check back to this page.

## 1. Contact Us

If you have any questions about this Privacy Policy or our treatment of the information you provide us, please write to us by email at [info.request@head-light.co.uk](mailto:info.request@head-light.co.uk) or by mail to Head Light Ltd, The Courtyard, High Street, Ascot, Berkshire SL5 7HP Attn: Privacy, Data Protection Officer.

## 2. Use of the Subscription Service

We provide a Subscription Service that allows visitors and users of our Website to access content or marketing information. We store and manage this on our service providers' servers. We are the Data Controller. We use the personal information given to then contact you about our goods or services and interact with you. Head Light acknowledges that you have the right to access your Personal Information and we are responsible for correcting, deleting or updating information that we have collected from you using the Subscription Service. We do not collect sensitive or 'special categories of personal data' (Article 9 of GDPR). Sensitive Information includes credit or debit card numbers, personal financial account information, social security numbers, passport numbers, driver's licence numbers or similar personal identifiers, racial or ethnic origin, physical or mental health condition or information, or other employment, financial or health information.

## 3. Information We Collect

### 3.1. When You Visit our Website

You are free to explore the Website without providing any information about yourself. When you visit the Website and choose to access our marketing collateral, you are giving consent for us to use the Personal Information about yourself that you provide, and we also collect Navigational Information when you accept our cookies. 'Personal Information' refers to any information that you voluntarily submit to us and that identifies you personally, including contact information, such as your name, e-mail address, company name, phone number, and other information about yourself or your business. Personal Information can also include information about any transactions, both free and paid, that you enter into on the Website, and information about you that is available on the internet, such as from Facebook, LinkedIn, Twitter and Google, or publicly available information that we acquire from service providers. 'Navigational Information' refers to information about your computer and your visits to this website such as your IP address, geographical location, browser type, referral source, length of visit and pages viewed.

### 3.2 Personal Information Obtained from Other Sources

Occasionally we purchase or are given Personal Information from other organisations based on job titles that may be interested in our products and services. In such instances we will let you know by email within one month that we intend to include you in our Subscription Service, and the source of the Personal Information and give you a clear option to unsubscribe from this. If you choose to unsubscribe, we will not contact you again.

Should we meet with you or talk with you and discuss our products and services, we will include you in our Subscription Service. You will always be able to unsubscribe from any marketing email we send you.

### 3.6. Information About Children

The Website and Subscription Service are not intended for or targeted at children under 13, and we do not knowingly or intentionally collect information about children under 13. If you believe that we have collected information about a child under 13, please contact us at [info.request@head-light.co.uk](mailto:info.request@head-light.co.uk), so that we may delete the information.

## 4. How Do We Use Your Personal Information

### 4.1. Compliance with Our Privacy Policy

We use the information we collect only in compliance with this Privacy Policy.

### 4.2. We Never Sell Personal Information

We will never sell your Personal Information to any third party.

### 4.3. Use of Personal Information

We process personal information for certain legitimate business purposes, which include some or all of the following:

- a) where the processing enables us to enhance, modify, personalise or otherwise improve our services / communications for the benefit of our customers;
- b) to identify and prevent fraud;
- c) to enhance the security of our network and information systems;
- d) to better understand how people interact with our website;
- e) to send information to you which we think may be of interest to you by post, email, or other means;
- f) to determine the effectiveness of promotional campaigns and advertising.

Whenever we process data for these purposes we will ensure that we always keep your Personal Data rights in high regard and take account of these rights. You have the right to object to this processing if you wish, and if you wish to do so please contact us at [info.request@head-light.co.uk](mailto:info.request@head-light.co.uk)

Please bear in mind that if you object this may affect our ability to carry out the tasks above for your benefit.

In addition to the uses identified elsewhere in this Privacy Policy, we may process your Personal Information for our legitimate business interests to: (a) improve your browsing experience by personalising the Website and to improve the Subscription Service; and (b) send to you via email marketing communications relating to our business.

### 4.4. Use of Navigational Information

We use Navigational Information to operate and improve the Website and the Subscription Service. We may also use Navigational Information alone or in combination with Personal Information to provide you with personalised information about Head Light.

#### 4.5. Security of your Personal Information

We use a variety of security technologies and procedures to help protect your Personal Information from unauthorised access, use or disclosure. We secure the Personal Information you provide on computer servers in a controlled, secure environment, protected from unauthorised access, use or disclosure via encryption. If you have any questions about the security of your Personal Information, you can contact us at [info.request@head-light.co.uk](mailto:info.request@head-light.co.uk).

#### 4.6 Transferring your Personal Information outside of Europe

The Personal Information which you provide to us may be transferred to countries outside the European Union ("EU"). Our Marketing Automatic system is HubSpot and it is responsible for the processing of Personal Data. It stores the data in the US and HubSpot participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, HubSpot is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List at <https://www.privacyshield.gov>.

By submitting your Personal Information, you're agreeing to this transfer, storing or processing.

#### 4.7. Social Media Features

Our Website includes Social Media Features and Widgets or interactive mini-programs that run on our sites. These features may collect your IP address, which page you are visiting on our sites, and may set a cookie to enable the feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Websites. This Privacy Policy does not apply to these features. Your interactions with these features are governed by the privacy policy and other policies of the companies providing them.

#### 4.8. External Websites

Our Website provides links to other websites. We do not control, and are not responsible for, the content or practices of these other websites. Our provision of such links does not constitute our endorsement of these other websites, their content, their owners, or their practices. This Privacy Policy does not apply to these other websites, which are subject to any privacy and other policies they may have.

#### 4.9 Retention of Personal Information

We retain Personal Information that you provide us as long as we consider it potentially useful in contacting you about the Subscription Service or our other services, or as needed to comply with our legal obligations, resolve disputes and enforce our agreements, and then we securely delete the information.

We will delete this information from the servers at an earlier date if you so request, as described in 'Opting Out and Unsubscribing' below. When there is a legitimate interest for us as the Data Controller to retain your Personal Information such as to inform or communicate with you as a customer of our Talent Management software, we shall retain the Personal Information for this purpose only.

#### 4.10 Compelled Disclosure

We reserve the right to use or disclose your Personal Information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process.

#### 4.11 Automated decision-making

Based on the marketing collateral you have requested, the web pages you have visited or the product areas we have discussed, we may choose to email you additional content in which we believe you will be interested.

### 5. Navigational Information

#### 5.1. Cookies

We use cookies or similar technologies to analyse trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. We use 'cookies' to help you personalise your online experience. A cookie is a text file that is placed on your hard disk by a Web server. Cookies are not used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a Web server in the domain that issued the cookie to you. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you register for the Subscription Service, a cookie helps us to recall your specific information on subsequent visits.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of our Subscription Service or Website. We keep track of the pages you visit, in order to determine what portion of the Head Light Website or Subscription Service is the most popular or most used. This data can be used to deliver customised content and promotions to those whose behaviour indicates that they are interested in a particular subject area.

We use a Marketing Automation system called HubSpot and its tracking code sets the following cookies, when a Website user visits our Website.

\_\_hstc

The main cookie for tracking visitors. It contains: the domain, utk (see below), initial timestamp (first visit), last timestamp (last visit), current timestamp (this visit), and session number (increments for each subsequent session)

(Expires: 2 years)

hubspotutk

This cookie is used for to keep track of a Website user's identity. This cookie is passed to HubSpot on form submission and used when deduplicating contacts.

(Expires: 10 years)

\_\_hssc

Cookie for keeping track of sessions. This is used to determine if we should increment the session number and timestamps in the \_\_hstc cookie. It contains: the domain, viewCount (increments each pageView in a session), session start timestamp.

(Expires: 30 min)

\_\_hssrc

Whenever HubSpot changes the session cookie, this cookie is also set. It is set to the value "1", and is used to determine if the User has restarted their browser. If this cookie does not exist when we manage cookies, we assume it is a new session.

(Expires: None. Session cookie)

\_\_hs\_opt\_out

This cookie is used by the opt-in privacy policy to remember not to ask the User to accept cookies again. This cookie is set when we give Users the choice to opt out of cookies.

(Expires: 2 years)

\_\_hs\_do\_not\_track

This cookie is set when we give Users the choice to opt out of cookies and they choose to do so. It disables tracking and personalisation.

(Expires: 2 years)

\_\_hs\_testcookie

This cookie is used to test whether the visitor has support for cookies enabled.

(Expires: Session cookie)

hsPagesViewedThisSession

This cookie is used to keep track of page views in a session.

(Expires: Session cookie)

Whilst we do not interfere with any cookies preferences you have submitted with your browser, our website does use Google Analytics, a web analysis service provided by Google Inc. ('Google'). If you have consented to the processing of third party cookies in your browser settings, your personal information will be processed in this way by our site.

Google Analytics uses cookies. The information about the way you use this website created by the cookie is sent to and stored on a Google server in the USA. In addition, we use Google Conversion Tracking in conjunction with Google Analytics. This will allow us to measure the behaviour of our website users. For example, we can see how many PDFs have been downloaded or how many times our contact form has been used. Likewise, we can ascertain how many clicks on advertisements from external sources (AdWords, LinkedIn, Xing, Bing) have led to our website. The IP address sent by your browser as part of Google Analytics is not combined with other data held by Google. You can change your browser settings to prevent cookies from being stored; however, we draw your attention to the fact that, in these circumstances, you may find that you are unable to make full use of functions on the website. You can also prevent the data (including your IP address) relating to your use of the website which is captured by the cookie being sent to or processed by Google by downloading and installing the browser plug-in from the following link <https://tools.google.com/dlpage/gaoptout?hl=en>.

You can refuse the use of Google Analytics by clicking on the following link. An opt-out cookie will be set on the computer, which prevents the future collection of your data when visiting this website: Disable Google Analytics

For further information please visit <https://www.google.com/analytics/terms/us.html> or <https://www.google.de/intl/en/policies/>.

## 5.2. Log Files

We may collect demographic information using log files that are not associated with your name or other personal information. There is also information about your computer hardware and software that is automatically collected by us. This information can include: your IP address, browser type, domain names, internet service provider (ISP), the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, clickstream data, access times and referring website addresses. This information is used by Head Light for the operation of the Subscription Service, to maintain quality of the Subscription Service, and to provide general statistics regarding use of the Head Light Website. For these purposes, we do link this automatically-collected data to Personal Information such as name, email address, address, and phone number.

### 5.3. Navigational Information

We collect Navigational Information when you visit our webpages.

## 6. Opting Out and Unsubscribing

### 6.1. Reviewing, Correcting and Removing Your Personal Information

Upon request Head Light will provide you with information about whether we hold any of your Personal Information.

If you provide us with your Personal Information, you have the following rights with respect to that information:

- To review the user information that you have supplied to us.
- To request that we correct any errors, outdated information, or omissions in user information that you have supplied to us.
- To request that your user information not be used to contact you.
- To request that your user information be removed from any solicitation list that we use.
- To request that your user information be deleted from our records.
- To opt out of being solicited by Head Light.

To exercise any of these rights, please contact us at [info.request@head-light.co.uk](mailto:info.request@head-light.co.uk) or by mail to Head Light Ltd, The Courtyard, High Street, Ascot, Berkshire SL5 7HP Attn: Privacy. We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken.

You have the right to lodge a complaint with a supervisory body. In the UK, this is the Information Commissioner's Office (ICO) - <https://ico.org.uk>.

### 6.2. Anti-Spam Policy

We include in every email sent using the Subscription Service an 'opt-out' mechanism.

### 6.3. To Unsubscribe From Our Subscription Service Communications

You may unsubscribe from our marketing communications by clicking on the 'unsubscribe' link located on the bottom of our emails, or by sending us email us at [info.request@head-light.co.uk](mailto:info.request@head-light.co.uk). In such instances we will not delete your details from our system so as to prevent you being re-contacted should we then obtain your details from another source (e.g. mailing list, exhibition or conference attendance.). Should you wish your details to be deleted, see 6.1.



**What if...**

*you could build a feedback-friendly culture?*

**What if...**

*you could fill more positions internally?*

**What if...**

*you could reduce employee turnover without increasing pay?*

**What if...**

*you could increase productivity?*

**What if...**

*you could spend less on training and still develop potential?*

**What if...**

*you could determine who to develop into leaders for the future?*

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E: [info.request@head-light.co.uk](mailto:info.request@head-light.co.uk)

W: [www.head-light.co.uk](http://www.head-light.co.uk)