



Head Light Privacy Policy

21 August 2024

1. Important Information

1.1. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. If you subscribe to our Subscription Service, the notice will be delivered via our Release Notice mechanism.

1.2. Contact Us

If you have any questions about this Privacy Policy or our treatment of the information you provide us, contact your 'Data Controller'.

2. Use of the Subscription Service by our Customers ('Data Controllers')

2.1. The Subscription Service

Our online Subscription Service allows any company that acts as a 'Data Controller' (our customers and/or Head Light itself) to conduct human resources associated processes which may include the gathering of their contact information and other demographic information. This information, which is stored and managed on our service providers' servers, is then used by the Data Controller.

Our customers configure the Subscription Service to require specific items of personal information to satisfy internal requirements such as reporting and analytics. Head Light Ltd does not control this configuration. That information belongs to them and is used, disclosed and protected by them according to their privacy policies and is not subject to this Privacy Policy. Head Light Ltd, acting as a 'Data Processor' processes our customers' information as they direct and in accordance with our agreements

with our customers, and we store it on our service providers' servers, but we do not have control over its collection or management. Our agreements with our customers prohibit us from using that information, except as necessary to provide and improve the Subscription Service, as permitted by this Privacy Policy, and as required by law. We have no direct relationship with individuals who provide Personal Information to our customers. Head Light Ltd acknowledges that you have the right to access your Personal Information and that right is exercised via your Data Controller. Our customers control and are responsible for correcting, deleting or updating information they have collected from you using the Subscription Service. If we are requested to remove data we will respond within a reasonable timeframe. We may work with our customers to help them provide notice to their visitors about their data collection, processing and usage. We are not responsible for our customers' use of information they collect on the Subscription Service.

Head Light collects information under the direction of its customers, and has no direct relationship with the individuals whose Personal Information it processes. If you are an employee of one of our customers, or have been contacted indirectly through this Subscription Service by them and would no longer like to be contacted by that customer that use our Subscription Service, please contact them directly. Transfers of data to any third parties are covered by the service agreements with our customers. Data collected automatically by the software, such as cookies or log data is used to administer and develop the system and to provide technical support to our customers who are using our services.

3. Information We Collect

3.1. When You Visit our Websites

When you login to the Subscription Service, we collect and store Navigational Information. If you log-out, that date and time is also logged. As you use the Subscription Service, we will log other specific activities for audit and tracking purposes, an example being an update. We may not track the actual nature of an update.

3.3. "Personal Information"

This refers to any information that you voluntarily submit to us and that identifies you personally, including contact information, such as your name, email address, company name, address, phone number, and other information about yourself. Personal Information can also include opinions of other people in the form of ratings or comments, your performance in role and so on. The specification of the Personal Information gathered is determined by the Data Controller and not by Head Light Ltd. Head Light Ltd make no use of this Personal Information other than to process it in accordance with instructions from the Data Controller, either explicitly in writing or through the actions of the Subscription Service, see below.

3.4. "Navigational Information"

This refers to information about your computer and your visits to this website such as your IP address, browser type, date and time. Please see the "Navigation Information" section below.

3.5. Deletion

When instructed to delete your Personal Information in accordance with our agreements, your Personal Information is 'put beyond use', as defined by the Information Commissioner's Office – linked [here](#), before being physically destroyed at a later date.

4. How We Use Information We Collect

4.1. Compliance with Our Privacy Policy

We use the information we collect only in compliance with this Privacy Policy. Customers who subscribe to our Subscription Services are obligated through our agreements with them to comply 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 use the information collected through our Subscription Service by our customers for the following purposes: (a) to provide the Subscription Service (which may include the detection, prevention and resolution of security and technical issues); (b) to respond to customer support requests; and (c) otherwise to fulfil the obligations under the contract between Customer and Head Light.

4.4. Use of Navigational Information

We use Navigational Information to operate the Subscription Service. Session cookies (which are removed once your session expires or your browser closes) are used to maintain information about your location within the site. No personal data is stored in the cookie.

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. All information is held encrypted at rest, within backups and when transmitted between the servers and the user's browser.

4.6. External Websites

The Subscription Service may be configured with 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. It is the responsibility of our customers (as Data Controllers) to carry out risk assessments relating to the use of optional AI tools in our Subscription Service. We work with customers to ensure they meet data processing legislation in this regard.

4.7. Retention of Personal Information

Your Data Controller determines the retention period of the data we hold about you, or as specified in our agreement with the Data Controller, or as needed to comply with our legal obligations, resolve disputes and enforce our agreements. On expiry of our agreements with our customer the Data Controller, our legal obligations or as instructed by our Data Controller, and then we securely delete the information from the Subscription Service. We will delete this information from the servers at an earlier date if you so request, as described in "Opting Out and Unsubscribing" below. After termination, we may, unless legally prohibited, delete all customer information, including your Personal Information, from the Subscription Service.

4.8. International Transfer of Information

As Head Light operates as a SaaS delivery model we operate as the Data Processors for our customers who act as the Data Controller. As such, responsibilities relating to the international transfer of information lie with the Data Controller. We will not transfer data outside the UK, or the EU, unless instructed to by the Data Controller.

4.9. 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.

5. Navigational Information

5.1. Cookies

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. 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 will not be able to use our Subscription Service.

Our subscription service uses session cookies which are used to enable a person to login and use the Talent system. These are classified as being strictly necessary for the service to function. If you disable the use of cookies in your browser the service will not operate as expected. When you close the browser, the cookies session ends.

The cookies in use are as follows:

- .ASPNet-Application - when a person is logged into the system
- Anti forgery token - which is a check to see if the user is human rather than robot
- ASP.NET-SessionID - which is a browser session ID

5.2. Single Sign-On

You can log in to our site using a Single Sign-on (SSO) service, if that has been configured by your Data Controller to be a part of this Subscription Service. This service will authenticate your identity so that you do not need an additional set of identifiers such as email address or password.

6. Opting Out and Unsubscribing

6.1. Reviewing, Correcting and Removing Your Personal Information

You should contact your Data Controller for details of the Personal Information held by the Subscription Service. Depending on the configuration of the Subscription Service determined by the Data Controller, you may or may not have direct access to all information held about you.

6.2. To Unsubscribe from Our Customers' Communications

Our customers instruct the Subscription Service to send emails to users based on either pre-determined workflows or on demand through the software itself. They are solely responsible for these communications, their frequency and their contents; we cannot unsubscribe you from their communications. You should contact your Data Controller directly should you wish to stop receiving emails.