



VERSION: SEPTEMBER 2026

1. Who we are

PROGRESSIO UK Limited (“PROGRESSIO”, “we”, “us” or “our”) is a company registered in England and Wales under company number 13421877. Our registered office is stated as the Fifth Floor, Kings House, 174 Hammersmith Road, London, W6 7JP, United Kingdom.

We provide specialist recruitment and search services, as well as Interim Management, with the UK business focused on procurement and supply chain. PROGRESSIO UK Limited acts as controller for personal data described in this notice. The wider PROGRESSIO/FourCentric group operates internationally. Where another group company is responsible for particular processing, we will identify that company where appropriate.

Contact: info@progressio-fourcentric.com

2. What this notice covers

This notice explains how we collect, use, disclose, store and protect personal data when you interact with us. It applies, as relevant, to:

- website visitors and people who contact us through our website;
- clients, prospective clients and their employees or representatives;
- job candidates and prospective candidates, including people we identify through talent searches or referrals;
- referees and other people connected with a recruitment process;
- suppliers and professional advisers;
- business contacts and people with whom we communicate for networking or business development; and people

3. Personal data we may collect

Depending on how you interact with us, we may process:

- identity and contact information, such as name, job title, employer, email address, telephone number and business address;
- professional and career information, including CVs, employment history, qualifications, skills, experience, professional interests and references;
- information relating to roles, vacancies, recruitment requirements and candidate preferences;
- communications and correspondence with us, including notes of calls or meetings where appropriate;
- information obtained from publicly available professional sources, business directories, company websites and professional networking platforms such as LinkedIn;
- website, device and usage information, including information collected through cookies and similar technologies, subject to our Cookie Policy;
- information required for legal, regulatory, contractual, financial or administrative purposes; and
- special category or criminal offence data only where this is necessary, lawful and supported by an appropriate additional condition under applicable data protection law.

4. How we obtain personal data

We may obtain personal data directly from you, from your employer or prospective employer, from a client, from another candidate or referral source, from publicly available sources, from professional networking platforms, from recruitment databases or service providers, and from other lawful sources.

Where we obtain personal data from a source other than the individual, we will provide the privacy information required by applicable law at the appropriate time, subject to any lawful exemption.

5. Why we use personal data and our lawful bases

PURPOSE	TYPICAL DATA	LAWFUL BASIS
Responding to enquiries and providing recruitment/search services	Contact, role and professional information	Steps prior to entering into a contract; contract; and/or legitimate interests
Candidate identification, assessment and introduction to clients	CV, career, qualifications, skills, references and related information	Legitimate interests and, where applicable, steps prior to entering into a contract
Maintaining candidate and client records	Contact and professional information	Legitimate interests and/or contract
Business development and B2B marketing	Business contact details and professional information	Legitimate interests, subject to applicable direct marketing rules
Sending electronic marketing where consent is required	Contact details and marketing preferences	Consent
Website operation, security and analytics	Technical and usage information	Legitimate interests or consent, depending on the technology and applicable PECR requirements
Compliance, legal claims and protection of our business	Relevant personal data	Legal obligation and/or legitimate interests

Where we rely on legitimate interests, those interests may include operating and developing our recruitment business, identifying suitable candidates and clients, maintaining professional relationships, preventing fraud and misuse, protecting our systems and records, and communicating with business contacts about relevant services. We will balance those interests against the rights and interests of the individual.

6. Recruitment and candidate information

As a recruitment and search business, we may identify candidates who have not directly applied for a particular vacancy. We may contact prospective candidates using professional contact information obtained from lawful sources. We may also maintain candidate profiles so that we can assess suitability for current and future opportunities.

We may use artificial intelligence tools to help identify, search for or prioritise potential candidates against role-related criteria such as skills, experience, qualifications, sector knowledge, seniority, location, availability or other

client requirements. These tools support our recruitment work but do not replace human review. Relevant staff remain responsible for assessing candidate suitability and deciding whether to contact, shortlist or introduce a candidate to a client.

Where appropriate, candidate information may be shared with a prospective or existing client for the purpose of considering the candidate for a role. We will only disclose information where we have a lawful basis to do so and will take reasonable steps to ensure that information is relevant and accurate.

Candidates may ask us about the information we hold about them, request corrections, object to particular processing or ask us to stop contacting them, subject to applicable legal requirements.

7. Special category and criminal offence data

We do not routinely require special category data. Where such data is processed, for example information concerning health, disability or diversity, we will do so only where necessary and where an appropriate condition under applicable law is available. Criminal offence data will only be processed where permitted by applicable law and where the necessary safeguards are in place.

We will not use special category or criminal offence data merely because it is available to us.

8. Sharing personal data

We may share personal data with clients and prospective employers as part of recruitment assignments: group companies where appropriate; technology and CRM providers; recruitment platforms; professional advisers; insurers; regulators and public authorities; and other service providers who process information on our behalf.

In particular, where it processes personal data on our behalf and under our instructions, Anvil Analytical Limited and FourCentric Group Limited act as processors. This may include processing for technology services, operational support, administration, analytics, systems support or other services provided to support the UK business.

PROVIDER	SERVICE OR PURPOSE	ROLE	PROCESSING LOCATION
Microsoft	Email, productivity, document storage, hosting and related cloud services	Processor	EU
Blinkered Media	Cookie consent management, recording consent choices and supporting website compliance	Processor	EU

Where a third party processes personal data on our behalf, we will take appropriate steps to ensure that the processing is subject to suitable contractual and security arrangements.

9. International transfers

PROGRESSIO is part of an international group and may use service providers or group companies located outside the UK and EU. Where personal data is transferred outside the UK or the EU and the transfer is subject to the UK or EU international transfer rules, we will use an applicable adequacy regulation or appropriate safeguards and comply with the requirements of applicable data protection law.

10. Direct marketing and business development

We may contact business contacts about relevant recruitment and search services where permitted by applicable law. We may use professional information from public sources or professional networking platforms for this purpose.

We will respect applicable electronic marketing rules and provide appropriate opportunities to object or opt out. You can object to direct marketing at any time by contacting info@progressio-fourcentric.com. Where you object to direct marketing, we will stop using your personal data for that purpose, subject to any limited processing required to record and respect your objection.

11. Cookies and similar technologies

Our website uses cookies and similar technologies. Some are necessary for the website to operate; others may be used for analytics, functionality or other purposes. Where consent is required, we will seek it before using the relevant technology. See our separate UK Cookie Policy for further information and choices.

12. Data retention

We retain personal data only for as long as reasonably necessary for the purposes for which it was collected, incl. to meet legal, regulatory, accounting and reporting requirements, resolve disputes and establish or defend legal claims.

RECORD OR DATA CATEGORY	EXAMPLES	RETENTION PERIOD
Candidate and applicant records	Contact details, CVs, application information and recruitment assessment information for prospective or unsuccessful candidates	Until the position is filled and then for 3 years
Candidate and applicant references	References obtained to confirm information provided, qualifications and suitability	Destroyed when the employee leaves the business
Client, prospect and billing contact records	Primary client contacts, client employees, billing contacts, business contact details and correspondence records	As stated in the client contract or 3 years after completion of the contract, whichever comes first. Billing records are retained for 6 years after the last invoice date.
Third-party contact records	Contact details for third parties involved in contracted services	30 days after completion of the contract
Client project and service data	Client business documents, data files, spend files and data containing names, email addresses, business phone numbers, company names or dates of birth where applicable	As stated in the client contract or 3 years after completion of the contract, whichever comes first
Marketing and lead generation records	Potential client contact data and purchased marketing list records used for business development and sales	Until no longer relevant or until the individual objects or opts out, subject to any suppression record needed to respect that choice

13. Security

We use appropriate technical and organisational measures designed to protect personal data against unauthorised access, loss, destruction, alteration or disclosure. Access is limited to people and providers who need the information for legitimate business purposes.

14. Your rights

Depending on the circumstances and the lawful basis used for processing, you may have rights including:

- to be informed about how your personal data is used;
- to request access to your personal data;
- to request correction of inaccurate or incomplete information;
- to request erasure in certain circumstances;
- to request restriction of processing in certain circumstances;
- to object to processing based on legitimate interests and, in particular, to direct marketing;
- to request data portability where applicable; and
- to withdraw consent where processing is based on consent.

You can exercise relevant rights by contacting info@progressio-fourcentric.com. We may need to verify your identity before responding.

15. Automated decision-making and profiling

We may use artificial intelligence tools to support candidate identification, searching, matching or prioritisation against role-related criteria. We do not use these tools to make solely automated decisions that produce legal or similarly significant effects about individuals. AI-assisted outputs are reviewed by relevant staff, and human judgment remains part of recruitment decisions such as whether to contact, shortlist or introduce a candidate to a client. If our use of automated decision-making or profiling changes in a way that triggers additional transparency or safeguards, we will update this notice and implement the required measures.

16. Complaints

If you have concerns about how we use your personal data, please contact us first at info@progressio-fourcentric.com so that we can investigate.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection. The ICO's website is <https://ico.org.uk/>.

17. Changes to this notice

We may update this notice from time to time to reflect changes in our business, technology or applicable law. The latest version will be made available on our website.