

Privacy Policy

Hroes Limited

Last updated: 13 August 2026

1. Introduction

1.1 Hroes Limited (**Hroes, we, us, our**) is committed to protecting the privacy of the people we deal with. This privacy policy explains how we collect, use and share personal data when you visit our website (hroes.co.uk), enquire about or purchase our services, use our platform, or otherwise interact with us, and it explains your rights under data protection law.

1.2 We are a company registered in England and Wales with company number 14716493. Our registered office is at One City West, Gelderd Road, Leeds LS12 6NJ.

1.3 We are the controller of the personal data described in this policy.

1.4 If you have any questions about this policy or how we handle personal data, please contact our customer services team at customerservices@hroes.co.uk, or write to us at the registered office address above, marked for the attention of the Data Protection Lead.

2. When this policy applies — and when it does not

2.1 This policy applies where we decide how and why personal data is used — that is, where we act as a **controller**. This includes personal data about: visitors to our website; people who contact us, book a demonstration or request information; contacts at our customers, prospective customers, suppliers and partners; individual learners enrolled on our e-learning courses; and people whose data we process for our own business purposes, such as maintaining professional advice records, billing, regulatory compliance and insurance declarations.

2.2 It does **not** cover the personal data our customers upload to our HR software platform or provide to us so that we can deliver HR and employment law services to them — for example, information about a customer's employees held in the platform or shared with our consultants or the AI Adviser. For that data our customer is the controller and we act as their **processor**, and we handle it in accordance with the data protection provisions of our contract with the customer. If you are an employee of one of our customers and want to understand how your personal data is used, please contact your employer in the first instance.

3. The personal data we collect

3.1 We collect and use the following categories of personal data: **identity and contact data** — name, job title, employer, email address, telephone number and business address; **enquiry and account data** — information you provide when you contact us, book a

demonstration, register for an event or webinar, or set up an account, including login credentials for our platform; **contract and billing data** — details of the services your organisation has purchased, order details, invoicing and payment information, and records of our correspondence and advice; **learner data** — enrolment details, course progress and completion records for e-learning courses; **insurance declaration data** — where a customer benefits from our employment risk cover, the customer details we are required to include in periodic declarations to the insurer; **technical and usage data** — IP address, browser type and version, device information, and information about how you use our website and platform, collected through cookies and similar technologies (see our Cookies Policy); and **marketing data** — your preferences in receiving marketing from us and your engagement with our communications.

3.2 We do not intend to collect special category data (such as health information) or data about criminal convictions through our website. Where such data is shared with us in the course of providing HR and employment law services to a customer, we normally process it as the customer's processor, as described in paragraph 2.2.

4. How we collect personal data

4.1 We collect personal data: **directly from you**, when you fill in forms on our website, book a demonstration, correspond with us by email or telephone, attend a meeting or event, or use our services; **from your organisation**, where your employer or colleague provides your details as a contact, authorised user or learner; **automatically**, through cookies and similar technologies when you use our website or platform (see our Cookies Policy); and **from third parties**, such as our CRM and marketing platforms, publicly available sources (for example Companies House and LinkedIn), and event organisers.

5. How we use personal data and our lawful bases

5.1 We use personal data only where the law allows us to. Most commonly, we rely on the following lawful bases under the UK GDPR:

5.2 **Performance of a contract** — to set up and administer accounts, provide the services your organisation has purchased (including platform access, consultancy and advice, e-learning and the AI Adviser), respond to service requests, and invoice and collect payment. Where our contract is with your organisation rather than with you personally, we rely on legitimate interests for these purposes.

5.3 **Legitimate interests** — to run and promote our business, including: responding to enquiries and providing demonstrations; managing our relationships with customers, prospects and suppliers; sending relevant marketing about our services to business contacts (subject to paragraph 7); administering, securing and improving our website, platform and services; maintaining professional advice records; preventing fraud and misuse; and enforcing our terms and defending legal claims. Where we rely on legitimate interests, we balance those interests against your rights and freedoms, and we do not use your personal data where our interests are overridden by the impact on you.

5.4 Legal obligation — to comply with our legal and regulatory obligations, including accounting and tax requirements and responding to lawful requests from authorities.

5.5 Consent — where required for certain marketing communications and for non-essential cookies (see our Cookies Policy). Where we rely on consent, you can withdraw it at any time.

5.6 Insurance declarations. Where your organisation benefits from employment practices liability cover under our insurance policy, we include the covered customer's details in the periodic declarations we are required to make to the insurer, and we share information with the insurer, its appointed panel law firms and our insurance broker for the purposes of arranging cover and handling claims. We do this on the basis of our legitimate interests in maintaining the cover and performing our contracts, and to the extent necessary for the establishment, exercise or defence of legal claims.

6. Our use of artificial intelligence

6.1 We use artificial intelligence tools as part of delivering our services, including our AI Adviser (a retrieval-augmented generation tool which answers HR queries by reference to pre-fed documentation) and tools which help us organise and summarise information, conduct research, assist with drafting and support analysis. Where AI tools are used in the delivery of consultancy and advice, all work product remains subject to review and approval by our qualified professionals before it is provided to the customer.

6.2 We may use anonymised and de-identified data derived from our work — which cannot be traced back to any customer or individual — to improve service delivery and train AI systems. We do not use personal data, confidential information or information that could identify a customer or its staff for these purposes without express prior consent. All use of AI tools is subject to our obligations under data protection law and our duties of confidentiality.

7. Marketing

7.1 We may send you information about our services and related updates (such as employment law developments) where you have asked for it, where you or your organisation are a customer and the communication relates to similar services, or where we are otherwise permitted to contact you as a business contact. You can opt out at any time by using the unsubscribe link in any marketing email or by contacting us at customerservices@hroes.co.uk. We do not sell personal data, and we do not share your personal data with third parties for their own marketing.

8. Who we share personal data with

8.1 We share personal data with: **service providers** who support our business, including UK-based hosting providers for our platform, e-learning platform providers, CRM, marketing and communications providers, AI technology providers, IT support and payment providers, in each case under contracts which restrict their use of the data; **our insurer, insurance broker and panel law firms**, where relevant to the employment risk

cover described in paragraph 5.6 or to our own insurance arrangements; **professional advisers**, including lawyers, accountants, auditors and insurers, where reasonably necessary; and **authorities and regulators**, where we are required to do so by law or to protect our legal rights. If our business is sold or reorganised, personal data may be transferred to the purchaser or successor, who may use it in the ways described in this policy.

9. International transfers

9.1 Our platform and the customer content on it are hosted within the United Kingdom. Some of our service providers may process limited personal data outside the UK. Where personal data is transferred outside the UK, we ensure an appropriate safeguard recognised by UK data protection law is in place, such as an adequacy determination or the applicable standard contractual clauses / International Data Transfer Agreement. Further details are available on request.

10. How long we keep personal data

10.1 We keep personal data only for as long as we need it for the purposes it was collected for, including to satisfy legal, accounting, insurance or reporting requirements. In general: enquiry and marketing data is kept while our relationship with you or your organisation remains active and for a reasonable period afterwards; contract, billing and professional advice records are kept for the duration of the contract and for six years afterwards, in line with limitation periods; and customer content on our platform is returned or deleted in accordance with our contract, normally within 60 days of termination, save where the law requires us to retain it.

11. Security

11.1 We have put in place appropriate technical and organisational measures to protect personal data against accidental, unauthorised or unlawful destruction, loss, alteration, disclosure or access, including access controls, encryption in transit, and confidentiality obligations on our staff. We limit access to personal data to those who have a business need to know it, and we have procedures in place to deal with any suspected personal data breach and to notify you and the ICO where legally required.

12. Your rights

12.1 Under data protection law you have rights in relation to your personal data, including the right to: **access** the personal data we hold about you; have inaccurate data **rectified**; have data **erased** in certain circumstances; **restrict** or **object to** our processing, including an absolute right to object to direct marketing; **data portability** in certain circumstances; and **withdraw consent** at any time where we rely on consent. These rights are not absolute and may not apply in all circumstances.

12.2 To exercise any of these rights, contact us at customerservices@hroes.co.uk. We will respond within one month, and there is normally no fee. We may need to verify your identity before acting on a request. If your request relates to data we process on behalf of

your employer as their processor, we may pass your request to your employer, and you may wish to contact them directly.

12.3 You also have the right to complain to the Information Commissioner's Office (ICO), the UK regulator for data protection (ico.org.uk; helpline 0303 123 1113). We would, however, appreciate the chance to deal with your concerns first, so please consider contacting us before approaching the ICO.

13. Cookies

13.1 Our website uses cookies and similar technologies. For details of the cookies we use and how to manage them, please see our Cookies Policy.

14. Changes to this policy

14.1 We keep this policy under review and may update it from time to time. Any changes will be posted on this page with an updated "last updated" date. Significant changes will be brought to your attention where appropriate.