PRIVACY POLICY

SSS Compliance Services Ltd | CVGO Digital

Effective date: 30 October 2026

1. Introduction and scope

SSS Compliance Services Ltd, trading as CVGO Digital ("CVGO", "we", "us" or "our"), respects the privacy of people using our website, digital career platform and related services. This policy explains what information is processed, why, with whom it may be shared and the choices available to individuals.

This policy covers individual purchasers and licence holders aged 14 or over, including school and college learners, apprentices, jobseekers, employees and self-employed people; schools, colleges, employers and other licence-purchasing organisations; their authorised administrators; pilot participants; website visitors; and people contacting CVGO.

2. Data controller and privacy contact

SSS Compliance Services Ltd is the data controller for the personal information it processes for the purposes described in this policy. The CVGO Digital Pilot Terms and Conditions identify ICO registration number ZC111872.

Privacy enquiries, requests to access or delete information and other data protection requests may be sent to info@sss-ta.com.

3. Information processed

Licence administration: CVGO staff use names and email addresses to identify licence holders and manage licences, subscriptions and related enquiries. Organisation administrator names, business contact details, licence allocations and purchase records may also be processed.

Private career content: the platform stores and processes information users choose to enter, including CVs, cover letters, education, qualifications, employment history, skills, experience, achievements, references, uploaded certificates and other records in Careers Document Wallets and School Document Wallets.

Platform activities: information entered or generated through CV Builder, Skills Snapshot, Transferable Skills, Profile Checker, Track My Applications, Communication Tips, interview guidance and user-configured reminders may be processed to provide those functions.

Demographic and evaluation information: where provided, monitoring fields may include age group, gender, ethnic background, nationality and country of birth. Ethnic background is special-category personal data and requires an additional lawful condition and appropriate safeguards. Polling participation preferences, optional questionnaire responses and feedback may also be processed.

Transactions and technical information: subscription and payment status, invoices, service correspondence, security and account logs, browser/device information and cookie-related data may be processed. Payment card details are handled by payment providers rather than routinely stored by CVGO.

4. Private accounts and sharing controls

Each licence holder has an individual account. Private career information and documents are controlled by that individual. All documents are set to "Not Shared" by default. The individual chooses which documents to share, with whom and when to stop sharing.

Schools, colleges, employers and other organisations that purchase or allocate licences may view permitted licence administration information but cannot log into a learner's account or automatically view private CVs, cover letters, applications, wallets or documents. They cannot view licences independently purchased by individuals.

CVGO staff do not routinely access private account contents. Any exceptional technical or support access must be necessary, authorised and controlled. Service providers may process information to operate and secure the platform under appropriate arrangements.

Users may withdraw sharing permissions using available controls, but withdrawal cannot retrieve copies already downloaded or independently retained by a recipient.

5. How information is used

We process information to establish and administer accounts and licences; deliver CVGO features; store and retrieve user-controlled career records; support job application tracking and reminders; respond to enquiries; process payments; maintain security; meet legal obligations; and improve services using appropriately anonymised or aggregated findings.

We may send essential registration, licence, renewal, expiry, security and service communications. Optional marketing and promotions are sent only where permitted by applicable law and may be unsubscribed from. Identifiable testimonials or photographs are used for promotional purposes only with appropriate permission.

6. Lawful bases and sensitive information

Depending on the activity, processing may be necessary for performance of a contract, compliance with a legal obligation, legitimate interests that are not overridden by individuals' rights, or consent where appropriate. We assess and document the relevant basis for each processing purpose.

Where ethnic background or other special-category information is processed, an applicable UK GDPR Article 9 condition and any additional requirements must also be met. Demographic monitoring is not

a condition of access unless a specific lawful requirement is clearly explained. Users should be told which fields are optional and how monitoring information will be used.

Consent-based processing, including applicable optional polling or marketing activities, may be withdrawn without affecting processing already carried out lawfully.

7. College pilots, polling and evaluation

CVGO may invite individuals to participate in structured pilot evaluations, questionnaires and longer-term follow-up to assess confidence, digital skills, employability, career preparedness and outcomes. Evaluation polls are voluntary, and a non-response must not be represented as a completed response.

Participation information, feedback and questionnaire responses may be used to assess the pilot and improve the service. Participating organisations receive anonymised or appropriately aggregated findings rather than unrestricted access to individual responses or private career documents. Reporting for small cohorts is reviewed to reduce the risk that individuals could be identified.

Individuals are informed of the purpose of evaluation, the information requested, applicable consent and participation choices, and how longer-term follow-up will work.

8. Organisations and licence allocation

Organisations may buy and allocate licences and administer licence status, purchase and renewal information. Licence allocation does not transfer ownership or control of an individual's private career content to the organisation.

Leaving a school, college or employer does not by itself authorise that organisation to access or delete a user's private documents. Any reporting made available to organisations must respect the separation between licence administration and private account content.

9. Licence expiry, retention and deletion

A CVGO Digital licence lasts 12 months. If it is not renewed, access to the account and stored information is suspended, while the information remains retained in the account under the applicable retention arrangements. To regain access to the account and its stored contents, the user must purchase a new licence.

Users may contact CVGO to request permanent deletion of their account and associated personal information without first renewing their licence. Users with an active account may also delete documents and information through available platform controls.

Information may be retained where necessary for accounting, contractual, fraud-prevention, legal or regulatory obligations. Information removed from live systems is handled securely, and backup copies are removed according to applicable backup-retention schedules. We do not promise immediate removal from every backup or deletion of copies previously shared with others.

10. Third parties and disclosures

CVGO uses contracted service providers for hosting, secure storage, software operations, email delivery, payments and technical maintenance. Providers may process information needed to deliver their services under appropriate confidentiality, security and data protection arrangements.

CVGO does not sell users' personal information. We may disclose information where required by law or a valid legal process, subject to appropriate checks. An organisation's purchase of a licence does not give it access to private user documents.

11. Security, hosting and international transfers

CVGO's core application and document storage use Google Cloud Platform infrastructure in London, United Kingdom. Supporting services include other technical and communications providers, so not all processing should be assumed to take place exclusively in the UK.

We use appropriate account authentication, access restrictions, secure storage, backups, recovery measures and organisational security procedures. CVGO operates within SSS Compliance Services Ltd's cybersecurity arrangements, including Cyber Essentials certification.

Where personal information is transferred or accessed outside the UK, appropriate safeguards required by UK data protection law are applied. Suspected personal data breaches are investigated and reported to the ICO and affected individuals where legally required.

12. Cookies and online tracking

Our website and platform may use essential cookies or similar technologies for login, security and operation. Optional analytics or marketing technologies are used only in accordance with applicable consent requirements. Where consent is required, users must be able to accept or reject optional technologies and change their preferences.

The categories and providers shown in any live cookie notice should accurately reflect the technologies in use.

13. Users aged 14 to 17

CVGO is designed for users aged 14 and over. We aim to provide age-appropriate privacy explanations and safeguards. Younger users' private career information receives the same core account and sharing protections as adults, with documents unshared by default.

Schools and colleges cannot access private documents merely by purchasing a licence. Where parental involvement or consent is legally required for a particular activity, we follow the applicable requirements. Additional safeguards apply to marketing and information sharing involving younger users.

14. Data protection rights

Subject to applicable legal conditions and exceptions, individuals may request access to their personal information, correction of inaccurate information, erasure, restriction or objection to certain processing, data portability and withdrawal of consent where processing relies on consent.

The platform may provide Personal Data Requests functionality. Individuals can also contact info@sss-ta.com to exercise their rights, including requesting account deletion after licence expiry. We may need to verify identity before acting on a request. Individuals may complain to the UK Information Commissioner's Office (ICO).

15. Automated features and future AI

CVGO currently provides software-supported career tools and guidance. We do not describe its existing rules-based functions as AI-powered or claim that AI is currently in production.

If new AI functionality, profiling or automated decisions are introduced, we will review the processing, transparency, lawful bases and any additional legal protections before deployment and update this policy where necessary.

16. External websites and policy changes

Links to external websites and third-party services are subject to those providers' own privacy policies. We may update this policy when the law, platform or data practices change. Material changes will be communicated where appropriate, and the latest version will identify its effective date.