



Privacy Policy for Values Alignment Index®

Last updated: 22 June 2026

This Privacy Policy explains how And Evolve Limited (“we”, “us”, “our”) collects, uses and shares personal data when you use the Values Alignment Index (the “Service”). It also explains your rights under UK data protection law, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

By using the Service or accessing the Website, you acknowledge that you have read and understood this Privacy Policy.

Importantly, although your personal data is processed on the platform to run the Service, our access is restricted so that no &Evolve personnel can view identifiable client data. Only your employer or recruiter can see your individual results, and the data we ourselves access from the platform is anonymised.

Who we are and how to contact us

And Evolve Limited is the processor of your personal data unless we state otherwise. Our contact details are:

Registered address: Unit 15 Warwick Innovation Centre, Warwick Technology Park, Gallows Hill, Warwick, CV34 6UW

Email: support@and-evolve.com

Data Protection Adviser: Sharon Kathleen McDermott at skmcdermott@trencheslaw.co.uk
If you have any questions about this Privacy Policy or our data practices, please contact us using the details above.

Scope of this Privacy Policy

This Privacy Policy applies to personal data we process in connection with:

- Your use of the Service, including any web application, mobile application or software provided by us.
- Your use of the Website, including any pages, subdomains and associated content.
- Your communications with us by email, phone, chat, support portal or social media.
- Our marketing and business development activities.

Categories of personal data we collect

We collect and process the following categories of personal data, depending on how you interact with us:



Account and profile data: name, job title, organisation, user ID, username, password, preferences and settings.

Contact details: email address, telephone number, postal address.

Usage data: activity logs, feature usage, clickstream, session duration, pages viewed, referring/exit pages, timestamps and similar analytics.

Device and technical data: IP address, device identifiers, operating system, browser type and version, app version, language and region settings, time zone, approximate location derived from IP, diagnostic and crash data.

Support data: content of enquiries, support tickets, feedback, complaint details and related correspondence, including any attachments you provide.

Billing and transaction data: billing address, payment method details (tokenised or last four digits only, where applicable), tax information, purchase history, subscription plan, invoices and payment status. We do not store full card numbers; these are processed by our payment provider, Stripe.

Content and uploaded data: data or files you upload, submit or process via the Service which may include personal data of you or third parties, as determined by you. Where we process such data on your behalf, we act as a processor and our data processing agreement applies.

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Sources of personal data

We obtain personal data from:

- You directly, when you register, use the Service, complete forms, contact support or communicate with us.
- Your organisation, if you are an authorised user under an enterprise account.
- Automatically, through cookies and similar technologies when you use the Website or the Service.
- Third-party service providers that help us run the platform and process payments, in particular our cloud hosting provider, Amazon Web Services (AWS), and our payment provider, Stripe.

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Purposes and lawful bases for processing

For the data your employer or recruiter uploads and the responses you provide, your employer or recruiter is the controller and decides the purposes and legal basis; we process it only on their instructions, as their processor. We rely on our own legal basis only for the limited data we control, as set out below.

Providing and operating the Service: to create and manage accounts, authenticate users, provide functionality, and host and secure data. Lawful basis: we carry out this processing as processor on the instructions of your employer or recruiter, who as controller determines the legal basis.

Billing and account administration: to manage subscriptions, invoicing, payments, refunds and account notices. Lawful basis: performance of a contract and compliance with legal obligations (e.g. tax and accounting).

Service improvement and research: we use anonymised data, which does not identify any individual, to understand patterns, improve the Service and carry out research. As this data is anonymised it is not personal data, so data protection law does not apply to it.

Communications: to send service-related messages such as account, security and administrative notices. Lawful basis: we carry out this processing as processor on the instructions of your employer or recruiter.

Security: to keep the Service and personal data secure and to detect, prevent and investigate unauthorised access or misuse. Lawful basis: our legal obligation to keep personal data secure; and, for the assessment data, as processor on the controller's instructions.

Compliance and legal: to comply with laws, enforce our terms, establish and defend legal claims and respond to lawful requests. Lawful basis: compliance with legal obligations.

If we rely on consent, you may withdraw it at any time using the contact details above or the mechanisms provided in our communications. Withdrawing consent does not affect the lawfulness of processing before withdrawal.

Importantly, although your personal data is processed on the platform to run the Service, our access is restricted so that no &Evolve personnel can view identifiable client data. Only your employer or recruiter can see your individual results, and the data we ourselves access from the platform is anonymised.

Sharing and recipients of personal data

We do not sell personal data. We share it only as needed to provide the Service: your individual results are made available to your employer or recruiter (the controller); the platform is hosted for us by Amazon Web Services (AWS); and payments are processed by Stripe. AWS and Stripe act as our sub-processors. We may also disclose personal data where required by law.



International data transfers

We host and process personal data in the United Kingdom, using the AWS UK region, and do not routinely transfer it outside the UK. Our payment provider, Stripe, may process payment data outside the UK; where it does, we rely on appropriate safeguards such as the UK addendum to the standard contractual clauses. Where any other limited transfer occurs (for example, provider support access), we put appropriate safeguards in place.

Retention of personal data

We retain personal data for the duration of the relevant licence (up to 12 months from purchase) and for a further 3 months after the last licence is used, during which the account remains accessible. After that, the account is closed and all personal data is deleted, unless we are required by law to keep it. Anonymised research data does not identify anyone and is not personal data, so this does not apply to it.

Security measures

We implement appropriate technical and organisational measures to protect personal data, including access controls (in particular, restricting access so that no &Evolve personnel can view identifiable client data), two-factor authentication using a one-time code sent to your email at sign-up, encryption in transit and at rest, network and application security, vulnerability management, backup and recovery, staff training and policies, and supplier due diligence. While we work to protect your data, no system can be guaranteed to be completely secure.

Marketing preferences and opt-out

We will not contact you with information about our products, services, events and promotions.

Automated decision-making and profiling

We do not use automated decision-making, including profiling, that produces legal effects concerning you or similarly significantly affects you, within the meaning of UK GDPR Article 22. If this changes, we will inform you and provide information about the logic involved, as well as the significance and envisaged consequences of such processing, and your rights to obtain human intervention, to express your point of view and to contest the decision.

The Service analyses your responses to produce your values results (which is a form of profiling), but it does not make decisions about you automatically – your employer or recruiter, a person, interprets the results and decides. We do not use profiling for marketing.



Your data protection rights

Subject to applicable law and certain exemptions, you have the following rights:

- Access: to obtain confirmation as to whether we process your personal data and a copy of it.
- Rectification: to have inaccurate or incomplete data corrected.
- Erasure: to request deletion of your personal data in certain circumstances.
- Restriction: to request restriction of processing in certain circumstances.
- Portability: to receive personal data you provided to us in a structured, commonly used and machine-readable format and to transmit it to another controller where technically feasible.
- Objection: to object to certain processing in the circumstances allowed by law.
- Withdraw consent: where we rely on consent, to withdraw it at any time.

Because your employer or recruiter is the controller of your assessment data, and because our access is restricted so that we cannot identify you within the platform, please make requests about that data to your employer or recruiter and we will support them. To exercise your rights over any data we hold as our own controller, please contact us at support@and-evolve.com or Unit 15 Warwick Innovation Centre, Warwick Technology Park, Gallows Hill, Warwick, CV34 6UW. We may need to verify your identity before responding. We aim to respond within one month, or as otherwise required by law.

Children's data

The Service is not intended for children under 18. We do not knowingly collect personal data from children under this age. If you believe a child has provided us with personal data, please contact us so that we can take appropriate steps.

Third-party links

The Website and the Service may contain links to third-party websites, content or services. We are not responsible for the privacy practices of those third parties. We encourage you to read their privacy notices.

Changes to this Privacy Policy

We may update this Privacy Policy from time to time. We will post the updated version on the Website and indicate the "Last updated" date above. If we make material changes, we will post a prominent notice on the Website.

How to contact us and complaints

If you have questions, concerns or complaints about our use of your personal data, please contact us at support@and-evolve.com or write to us at Unit 15 Warwick Innovation Centre, Warwick Technology Park, Gallows Hill, Warwick, CV34 6UW, marked for the attention of our data protection adviser.



You also have the right to lodge a complaint with the UK Information Commissioner's Office (ICO). Further information is available at www.ico.org.uk, or you can contact the ICO by telephone on 0303 123 1113 or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Annex: Additional information where we act as a processor

Where we process personal data as a processor on behalf of a customer (for example, Content and uploaded data), our customer is the controller and is responsible for providing appropriate privacy information to data subjects. In such cases, our processing is governed by our data processing agreement with the customer and this Privacy Policy applies only to our role as an independent controller for the activities described above. Queries relating to controller rights for such data should be directed to the relevant customer.