

KTS GROUP

LEGAL AND COMPLIANCE

Anti-Spam and Unsolicited Communications Policy

Website publication version

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Core prohibition

No person is authorised to advertise, market, promote or direct traffic to kts-group.co through spam, unlawful unsolicited messaging, deceptive communications or unauthorised use of the KTS name, domain or branding.

KEY TALENT SOLUTIONS LTD

Company number 14405318 | Registered office: 128 City Road, London, EC1V 2NX

kts-group.co | info@kts-group.co

Policy at a glance

A clear public statement of how KTS prevents spam and controls recruitment and business communications.

01	KTS does not permit bulk, indiscriminate or unlawful unsolicited messaging.
02	No third party may promote kts-group.co or use KTS branding in unsolicited messages without written authority.
03	Lawful, relevant and targeted recruitment or business-to-business approaches may be made where permitted.
04	Every communication must identify the sender, be accurate and provide a practical way to object or opt out.
05	Objections are respected and suppression records are used to prevent repeat marketing contact.

Document control

Publisher	Key Talent Solutions Ltd, trading through KTS Group and relevant recruitment brands that adopt this Policy
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Related document	KTS Group Privacy Policy
Policy owner	Key Talent Solutions Ltd
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How to use this Policy

This Policy is intended for publication on the KTS website. It applies alongside the KTS Privacy Policy, contractual terms and any mandatory laws that apply in the recipient's country.

1. Purpose and status

This Anti-Spam and Unsolicited Communications Policy explains the standards applied by Key Talent Solutions Ltd, KTS Group and any relevant recruitment brand that links to or expressly adopts this Policy.

KTS is a global, multi-sector recruitment group. Its normal activities include communicating with candidates, workers, contractors, clients, prospective clients, hiring managers, referees, suppliers and other professional contacts.

The purpose of this Policy is to prevent spam, protect recipients, safeguard the KTS name and domain, and ensure that recruitment and business communications are lawful, relevant, transparent and proportionate.

This is a public policy statement. It does not create contractual rights for third parties and does not authorise any person to act for or represent KTS.

2. Scope

This Policy applies to:

- the website kts-group.co and any page or service operated through that domain;
- Key Talent Solutions Ltd, company number 14405318;
- KTS Group and any recruitment business or brand that adopts or links to this Policy;
- employees, consultants, contractors, temporary workers and representatives communicating for or on behalf of KTS; and
- suppliers, affiliates, introducers, data providers, marketing providers and other third parties authorised to communicate for KTS.

It applies to email, SMS, text messages, WhatsApp and similar messaging services, LinkedIn and other social-media direct messages, in-app messages, stored voice messages, automated or live telephone calls, and comparable communication methods.

3. Policy statement

KTS does not permit spam.

Except where KTS has given express written authority, no person may advertise, market, promote or direct traffic to the Website through unsolicited electronic messages. Even where authority has been given, all communications must comply with this Policy and applicable law.

KTS prohibits bulk, indiscriminate, irrelevant, misleading or unlawful unsolicited communications. KTS also prohibits any message that falsely appears to come from KTS or that uses the KTS name, website, domain or branding without permission.

This prohibition does not prevent KTS from making targeted, lawful and relevant recruitment or business-to-business approaches, including appropriate first-contact communications, where permitted by applicable law. A message is not automatically spam merely because the recipient has not previously communicated with KTS; the recipient, purpose, channel, jurisdiction and content must all be considered.

4. Definitions

4.1 KTS, we, us and our

These terms mean Key Talent Solutions Ltd and the relevant KTS business or recruitment brand responsible for the communication.

4.2 Website

Website means kts-group.co and any associated page, form or service operated through that domain.

4.3 Electronic communication

Electronic communication includes any text, voice, sound, image or video message sent through an electronic communications network and stored for a recipient to access. It includes email, text messages, social-media direct messages, stored voicemails and similar messages.

4.4 Spam

Spam means an advertising, marketing, recruitment or promotional communication that is unlawful, indiscriminate, misleading, excessive, sent after an objection, sent without required consent or authority, or otherwise contrary to this Policy.

4.5 Unsolicited

A communication is unsolicited where the recipient has not specifically asked for that particular communication. An unsolicited communication may still be lawful in limited circumstances, including certain targeted business-to-business communications, but it must meet all applicable requirements.

5. Prohibited advertising and messaging

No person may use the KTS name, Website, domain, logo, identity, data or services to:

- send or instigate unlawful unsolicited marketing or recruitment messages;
- advertise or promote kts-group.co through bulk, automated or indiscriminate messaging;
- claim to represent KTS without prior written authority;
- conceal, falsify, spoof or misrepresent the sender's identity or contact details;
- use false, misleading or exaggerated subject lines, vacancy details, candidate information or commercial claims;
- create or promote false vacancies, candidate profiles, assignments or recruitment opportunities;
- harvest, scrape or collect contact information by unlawful or unauthorised methods;
- use purchased, rented, shared or enriched contact lists without appropriate legal, quality and suppression checks;
- continue marketing after a recipient has objected or opted out;
- use alternative accounts, telephone numbers or domains to bypass an objection or suppression record;
- send malicious links, malware, phishing content, fraudulent payment requests or unsafe attachments;
- disclose CVs, candidate details, client information or other personal data without authority; or
- encourage another person to carry out any prohibited activity on KTS's behalf.

The presence of a KTS name, logo, email address or website link in a message does not, by itself, establish that the communication was sent or approved by KTS.

6. Permitted recruitment and business communications

Subject to applicable law and this Policy, KTS may send the following communications.

6.1 Requested and responsive communications

KTS may respond when a person has contacted KTS, submitted a CV, applied for a vacancy, registered a vacancy, requested information, asked to speak with a recruiter, requested candidate profiles or otherwise invited a response.

6.2 Candidate, worker and contractor communications

KTS may contact candidates, workers and contractors about potentially relevant opportunities, applications, interviews, availability, work preferences, references, qualifications, right-to-work and compliance checks, contracts, assignments, timesheets, payroll, payments and other recruitment-related matters.

6.3 Client and prospective-client communications

KTS may contact organisations and relevant professional contacts about current or anticipated vacancies, potentially suitable candidates, permanent or temporary recruitment support, contract and freelance resources, recruitment market information, assignments, introductions, terms and related professional services.

A first-contact business communication must be targeted and reasonably relevant to the recipient's role, organisation or likely recruitment responsibilities. Indiscriminate mass marketing is not permitted.

6.4 Administrative and service communications

KTS may send necessary non-promotional communications concerning an enquiry, application, assignment, placement, contract, security issue, fraud concern, legal obligation, compliance requirement, privacy update or other existing service relationship.

An objection to marketing will not normally prevent KTS from sending essential administrative, contractual, legal or service communications.

7. Consent and lawful basis

KTS will obtain consent where consent is required by applicable law. Consent must be freely given, specific, informed, unambiguous and demonstrated through a clear positive action. Silence, inactivity and pre-selected options will not be treated as consent.

Consent for one channel will not automatically be treated as consent for another channel. For example, consent to receive email will not automatically authorise text, WhatsApp or telephone marketing.

In the United Kingdom, targeted electronic business-to-business marketing to corporate subscribers may be permitted without prior consent under the Privacy and Electronic Communications Regulations 2003, as amended. Where KTS processes an identifiable business contact's personal data, the UK GDPR and Data Protection Act 2018 still apply, and KTS must have an appropriate lawful basis and respect applicable objections.

Sole traders, some partnerships and individuals may have greater protection. KTS personnel must not assume that every business contact may be approached without consent.

Where laws differ between jurisdictions, KTS will apply the mandatory rules that govern the communication and will follow the stricter standard where reasonably practicable.

8. Sources and use of contact information

KTS may obtain professional contact information from:

- information provided directly to KTS;
- CV submissions, job applications and candidate registrations;
- client vacancy registrations and existing recruitment relationships;
- previous business or recruitment communications;
- professional networking platforms, company websites and public business directories;
- professional events, referrals and introductions;

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- clients, candidates, referees and other business contacts;
 - approved data, research and sales intelligence providers; and
 - other lawful professional sources.

The fact that contact information is publicly available does not, by itself, amount to consent. Before using public or third-party information, KTS must consider relevance, reasonable expectations, consent requirements, lawful basis, fairness, source quality, previous objections and the KTS Privacy Policy.

9. Standards for KTS communications

Every recruitment, marketing or business-development communication sent by or for KTS must:

1. clearly identify the individual sender and the relevant KTS business or brand;
2. use accurate sender details, subject lines and contact information;
3. state a genuine and relevant reason for contacting the recipient;
4. be accurate, professional and not misleading;
5. use only authorised systems, data and templates;
6. provide a working reply address or other practical contact method;
7. include a clear way to object or opt out where required or appropriate;
8. be screened against applicable suppression and do-not-contact records;
9. be limited to a reasonable frequency and avoid unnecessary repetition;
10. use personal data only for an authorised and compatible purpose; and
11. comply with applicable privacy, data protection, recruitment and electronic marketing laws.

KTS communications must not disguise or conceal the identity of the person or organisation on whose behalf they are sent.

10. Opt-outs, objections and suppression

A recipient may ask KTS to stop sending recruitment or marketing communications at any time. A recipient may:

- use an unsubscribe link included in the message;
- reply to the sender with the word "unsubscribe";
- ask the relevant consultant not to contact them again; or
- email info@kts-group.co with the subject line "Unsubscribe Request".

KTS will action valid objections and opt-out requests as soon as reasonably practicable and within any applicable legal period.

KTS may retain the minimum information needed on a suppression or do-not-contact list so that the recipient is not accidentally added to a later campaign. Suppression information will not be used to send further marketing.

Where the scope of a request is clear, KTS will apply it without requiring unnecessary further information. A recipient may specify whether the request applies to email, vacancy alerts, candidate approaches, business-development messages, telephone calls, text or WhatsApp messages, or all non-essential communications.

11. Third parties and service providers

No third party may communicate for KTS unless it has prior written authority. An authorised service provider or representative must:

- act only within the scope of its written authority;
- comply with this Policy, the KTS Privacy Policy and KTS instructions;
- use only approved contact information, systems and message content;
- apply KTS suppression and do-not-contact records;
- implement appropriate confidentiality and security measures;
- comply with applicable data protection and electronic marketing laws; and
- stop communicating immediately when instructed by KTS.

Where required, KTS will put appropriate written data protection and service terms in place. KTS does not authorise affiliates, introducers, independent recruiters or marketing providers to promote KTS through spam.

12. Fraudulent, spoofed and unauthorised messages

Fraudsters may imitate legitimate recruitment businesses. Recipients should not assume that a message is genuine merely because it:

- contains the KTS name, logo or website address;
- appears to come from a similar-looking email address;
- refers to a genuine vacancy, candidate, employee or client; or
- uses publicly available company information.

Suspicious messages should be reported to info@kts-group.co before opening attachments, following links, providing personal information or making any payment.

To the extent permitted by law, KTS is not responsible for a communication sent by an unauthorised person merely because that person has copied, referred to or linked to KTS, its brands or the Website.

13. Complaints and reporting

Anyone who receives a message that appears to breach this Policy should report it to info@kts-group.co using the subject line "Spam Complaint".

Where available, the report should include:

- a copy or screenshot of the message;
- the sender's email address, telephone number or account name;
- the date and time the message was received;
- the full email headers, where available;
- the recipient address or account;
- any website link included in the message; and
- a short explanation of why the message appears unauthorised or inappropriate.

A person may also complain to the Information Commissioner's Office or another competent regulator where they believe applicable privacy or marketing law has been breached.

14. Investigations and enforcement

KTS may investigate credible reports and may take proportionate steps to:

- add a recipient to a suppression record;
- identify the sender and preserve relevant evidence;
- investigate possible misuse of KTS systems, data, domains or branding;
- instruct an authorised sender to stop;
- suspend or terminate access to KTS systems or data;
- suspend or terminate a supplier, contractor, consultant or commercial relationship;
- withdraw authority to use KTS branding;
- notify an email, hosting, telecommunications or social-media provider;
- report suspected fraud or unlawful activity to an appropriate authority; and
- take legal action where reasonably necessary.

Nothing in this Policy grants a licence or other right to use the KTS name, logo, Website, domain, database, content or other intellectual property.

15. Privacy, data protection and retention

This Policy concerns spam prevention and communications. The KTS Privacy Policy explains how KTS collects, uses, shares, secures and retains personal data and how individuals may exercise their data protection rights.

KTS will retain communication and suppression information only for as long as reasonably necessary for the relevant purpose, legal obligations, dispute management, security and the prevention of repeat marketing contact.

Where this Policy conflicts with a mandatory legal requirement, the mandatory requirement will take priority.

16. International communications

KTS operates as a global recruitment group and may communicate with recipients in more than one jurisdiction. Before a campaign or outreach activity is carried out, the responsible person must consider the recipient's location, the communication channel, the type of recipient, consent requirements, data protection rules and any local do-not-call or suppression requirements.

A communication that is permitted in one country may be restricted in another. KTS representatives and service providers must not rely solely on United Kingdom rules when contacting recipients outside the United Kingdom.

17. Changes to this Policy

KTS may amend this Policy to reflect changes in law, regulatory guidance, recruitment services, communication methods, systems or compliance practices. The revised version will be published on the Website with an updated version number and effective date.

18. Contact details and governing law

Questions, opt-out requests and spam complaints may be sent to:

Organisation	Key Talent Solutions Ltd / KTS Group
Email	info@kts-group.co
Website	https://kts-group.co
Registered office	128 City Road, London, United Kingdom, EC1V 2NX
Company number	14405318

This Policy and any non-contractual issue arising from it are governed by the laws of England and Wales, subject to any mandatory law or right that applies in another jurisdiction.

This Policy does not limit any statutory right or legal obligation that cannot lawfully be limited. It should be read together with the KTS Privacy Policy and applicable contractual terms.

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