

**NIYA**  
**PRIVACY NOTICE**

This version is effective from: August 2022

This Privacy Notice (“**Privacy Notice**”) sets out how Niya processes your personal data in connection with our business, including the provision of our platform at <https://niya.ai/> (“**Site**”) and the services we offer through our Site (together, our “**Service**”).

We will update this Privacy Notice from time to time to reflect any changes or proposed changes to our use of your personal data, or to comply with changes in applicable law or regulatory requirements. We may notify you by email of any significant changes to this Privacy Notice, but we encourage you to review this Privacy Notice periodically to keep up to date on how we use your personal data. If we update this Privacy Notice, we will update the effective date at the top of the page.

Your access to and use of our Service, including your profile, is subject at all times to our [Client Terms of Use](#) and our [Candidate Terms of Use](#) (as applicable).

**1 PURPOSE OF THIS PRIVACY NOTICE**

This Privacy Notice explains our approach to any personal data that we might collect from you or which we have obtained about you from a third party, and the purposes for which we process your personal data. This Privacy Notice also sets out your rights in respect of our processing of your personal data. For more information **see below**.

*When we talk about “personal data”, we mean any information which relates to an identified or identifiable living individual. Individuals might be identified by reference to a name, an identification number, location data, an online identifier (such as an IP address) or to other factors that are specific to them, such as their physical appearance.*

*This Privacy Notice is intended to assist you in making informed decisions when using our Service. Please take a moment to read and understand it. It should be read in conjunction with our [Client Terms of Use](#), our [Candidate Terms of Use](#) and our [Cookie Policy](#).*

*This Privacy Notice only applies to the use of your personal data obtained by us, whether from you directly or from a third party. It does not apply to personal data collected by third parties during your communications with those third parties or your use of their services (for example, where you follow links to third party websites over which we have no control).*

**2 ABOUT US**

Our Service is made available by Niya Network Limited (“**Niya**”, “**we**”, “**us**”, “**our**”). Niya is the data controller responsible for your personal data. Niya is an English company (No: 13056558) with its registered office at 86-90 Paul Street, London, United Kingdom, EC2A 4NE.

**3 HOW TO CONTACT US**

If you have any questions about this Privacy Notice or want to exercise [your rights as a data subject](#) set out in this Privacy Notice, you can contact us using the following methods:

<b>On Site</b>	Contact us using our Enquiry Form.
<b>Email</b>	Send us an email at: <a href="mailto:team@niya.ai">team@niya.ai</a> .
<b>Post</b>	Write to us at: 86-90 Paul Street, London, United Kingdom, EC2A 4NE

#### 4 WHAT PERSONAL DATA WE COLLECT

In providing our Service, we may collect and process different types of personal data about you for different processing purposes. The types of personal data we collect depends on who you are and how you use our Service and includes the following:

<b>Identity Data</b>	First name; last name.
<b>Contact Data</b>	Address; email address; telephone number; social media handle.
<b>Registration Data</b>	First name; last name; date of birth; gender; country of residence; nationality; company; job title; employment status; qualifications; skillset; any KYC information that we may collect; any other personal data that you may provide when you register an account with us.
<b>Financial Data</b>	Bank account details; payment card details; billing address.
<b>Transaction Data</b>	Details about payments made between you and us; details about your use of the Service.
<b>Profile Data</b>	Account username; password; profile picture; purchase details; interests and preferences; contact preferences; employment history and/or professional experience; references; skillset; social media handle; website and/or portfolio details; the content of any messaging you send using any Enquiry Form and/or chat function on our Service; details of any employment matches via the Service.
<b>Behavioural Data</b>	Data relating to your browsing activity or interaction with our emails, obtained through the use of cookies, pixel tags and other similar technologies; information about when your current or previous sessions started; details about your use of the Service.
<b>Technical Data</b>	IP address; browser type and operating system; geolocation, to ensure we're showing you the correct notices and information; any other unique numbers assigned to a device.
<b>Marketing and Communications Data</b>	Marketing preferences; service communication preferences.

#### 5 HOW WE COLLECT AND RECEIVE PERSONAL DATA

We collect and receive personal data using different methods:

<b>Personal data you provide to us</b>	You may give us your personal data directly, for example, when you submit an application to register for an account and create a profile on our Service, contact us with enquiries, complete forms or upload information to our Service, send messages using the chat function on our Service, subscribe to receive our marketing communications or provide feedback to us.
<b>Personal data we collect using cookies and other similar technologies</b>	When you access and use our Service, we will collect certain Behavioural Data and Technical Data. We collect this personal data by using cookies and other similar technologies (see the "Insight, analysis and retargeting through Cookies")

	section below).
<b>Personal data received from third parties</b>	We may receive personal data about you from third parties. Such third parties may include NGOs and charities we work with, analytics providers, and third parties that provide technical services to us so that we can provide our Service.
<b>Publicly available personal data</b>	From time to time, we may collect personal data about you (Identity Data, Contact Data or Profile Data) that is contained in publicly available sources (including media reports) or that you or a third party may otherwise make publicly available (for example through speeches at events or publishing articles or other news stories or posts on social media platforms).

## 6 WHO WE COLLECT PERSONAL DATA ABOUT

We collect and process personal data from the following people:

<b>Service visitors</b>	Client Users, Candidate Users and any other (non-registered) user of Niya who visits or interacts with our Service.
<b>Client User</b>	A user that accesses Niya on behalf of one of our clients that are seeking to find and/or engage Candidate Users via our Service.
<b>Candidate User</b>	A user that accesses our Service in connection with (i) the supply or potential supply of services to our clients; and/or (ii) the engagement or potential engagement with our clients as worker or employee, in each case in accordance with briefs communicated to Niya by Client Users.
<b>People who contact us with enquiries</b>	If you contact us with an enquiry through our Service or otherwise, we will collect and process your personal data in connection with your interaction with us and our Service.
<b>People who work for our customers and suppliers</b>	If you work for one of our clients or suppliers and have responsibility for placing orders with us, administering your organisation's account with us or handling our orders or our account with your organisation, we will process your personal data in connection with your organisation's relationship with us.
<b>Visitors to our physical locations</b>	If you attend one of our physical offices or other locations, we may process personal data that you volunteer in connection with your visit and any enquiries you make. CCTV footage may also be collected for security purposes.
<b>Event attendees</b>	If you attend one of our events, we will process personal data about you in connection with your attendance at the event. For example, we may ask you to complete a registration or feedback form, or other document relating to the event.
<b>Job applicants</b>	If you apply for a job with us, we will collect and process your personal data in connection with your application.

## 7 HOW WE USE YOUR PERSONAL DATA

We use your personal data for the purposes set out in this section. If we wish to make any changes to these purposes, or if we wish to use your personal data for any purpose that is not listed in this section, we will notify you using the contact details we hold for you.

### Use of our Service by Candidate Users. For more information see below.

<p><b>To register your initial interest in Niya and assess your suitability to use our Service</b></p>	<p>If you submit an application to register as a Candidate User of Niya, you will need to complete the registration form, providing all required Identity Data, Contact Data, Registration Data, Financial Data, and Profile Data. We will use this data in order to process your registration and understand whether you meet the candidate criteria to use our Service.</p> <p>We will contact you using your Contact Data to let you know that we have received your application and if you are suitable for our Service, in which event you will be invited to publish your profile (see below).</p> <p>We will also use your Profile Data on an ongoing basis to assess your continued suitability to be registered as a Candidate User.</p> <p>If we do not consider you suitable to use our Service as a Candidate User, we will notify you and reject your application for registration or terminate your use of Niya (as applicable).</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our and our client's legitimate interests to use your personal data to ensure that Niya is only used by Candidate Users that are generally suitable for our Service, and to ensure we provide access to our Service in an effective way.</p>
<p><b>To complete your registration and to create and manage your profile</b></p>	<p>We may also ask for further information if we think it may be useful in providing our Service to you.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest to use your personal data in such a way to register your account on Niya and onboard you. Where you provide any special category data (such as data concerning your health) to us as part of your application, it is necessary for us to process this to ensure that we and/or our clients are meeting the duty of care that is owed to you (i.e. to ensure that any briefs are suitable and do not put you at unnecessary risk) and to defend against any potential legal claim that may be issued against us or our clients.</p>
<p><b>To match you with employment opportunities and to share your personal data with our clients</b></p>	<p>We process your Identity Data, Contact Data, Registration Data and Profile Data to filter for, match you with, show you information about, and provide you with access to, employment opportunities.</p> <p>When you register an account and create a profile on our Service, you will be invited to input information about your skillset as part of your Registration Data and Profile Data.</p> <p>If you match with an employment opportunity on our Service,</p>

	<p>we process your Contact Data to notify you of the match and provide you with information about the opportunity. We process your Profile Data to keep a record of any matches and the content of any messages you send using the chat function on the Service</p> <p><b>Please note, where we share your personal data with Client Users, that client will be a separate controller of any of your personal data that they receive in connection with your supply of services and/or work. For information about how and why our clients process your personal data, please see their privacy policy or contact them for further information.</b></p> <p><b><i>Our legal basis for processing</i></b></p> <p>Use of your personal data in this way is integral to our Service and for matching you to employment opportunities. It is therefore necessary for us to use your personal data in this way to perform the contract that we have with you.</p>
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**Use of our Service by Client Users and managing our client relationships. For more information see below.**

<p><b>Use of our Service by Client Users</b></p>	<p>Where you are a Client User, we collect and maintain personal data that you provide to us or that we otherwise receive in connection with your use of Niya. We will use this for the purpose of supplying our Service to our clients.</p> <p>The personal data we process may include your Identity Data, Contact Data, Registration Data, Financial Data and Transaction Data (where applicable and to the extent that this constitutes your personal data). We process this information so that we can fulfil the supply of our Service and for record-keeping purposes. We may collect and process your personal data whether you are interacting with us on your own behalf or on behalf of any organisation you represent.</p> <p>If you attend one of our offices, we will process personal data about you that we receive in connection with your visit or any enquiries that you have. This will usually include your Contact Data, and any other personal data you volunteer.</p> <p>Note, use of our Service is also subject to separate terms and conditions between us and our clients. For more information see our <u><i>Client Terms of Use</i></u>.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you for the Service, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we provide our Service in an</p>
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	effective, safe and efficient way.
<p><b>Managing our client relationships and communicating with our clients and potential clients</b></p>	<p>When you make an enquiry (whether via email, telephone or otherwise) or we communicate with you in relation to our Service, we will collect and process your Identity Data, Contact Data and, if applicable, Transaction Data, as well as any other relevant personal data you volunteer or that we otherwise receive. We use this information to respond to your enquiry and to manage the relationships that we have with our clients.</p> <p>We may also record (including voice recordings of telephone conversations) and use the information referred to above to train our personnel so that they can effectively deal with enquiries.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest to use your personal data in the ways described above to ensure that we are able to help you with your enquiry, provide a good standard of service and improve our client relationships.</p>

**Other use of Niya by Service Visitors. For more information see below.**

<p><b>If you browse Niya</b></p>	<p>When you browse Niya, we collect and process Behavioural Data and Technical Data to help us understand how you are using and navigating our Service. We do this so that we can better understand which parts of our Service are more or less popular and improve the structure and navigation of our Service.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>Please see the “Insight and analysis through Cookies” section to learn about the legal basis that we rely on to collect data via the use of non-essential Cookies.</p> <p>Where we collect Behavioural Data and Technical Data other than through the use of non-essential Cookies, it is in our legitimate interest to use personal data in such a way to ensure that we provide access to our Service in a secure and effective way and so that we can make improvements to our Service.</p>
<p><b>If you contribute to or post content on our Service</b></p>	<p>If you write an article or blog for us or contribute in any other way to publications on our Service, we may use your personal data (such as your Identity Data and/or Contact Details) to credit you for your contribution. If you provide photographs or other images in support of your article or blog, we may publish one or more of those images alongside your article or blog.</p> <p>If you submit any other content to us, such as photographs, quotes or testimonials, we may process any personal data</p>

	<p>comprised within that content for the purposes of promoting our Service.</p> <p>We may also allow third parties to use the articles or blogs that you contribute, or the content that you provide. If the use of such content would involve the use of your personal data, we may use your Contact Details to ask your permission to use the relevant content, unless we are satisfied that we have a lawful right to use the content without your permission.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>Where we permit a third party to use your personal data contained within content that you submit, we will do so without your permission if we are satisfied that it is within our or the third party's legitimate interest to use your personal data, including to promote our Service or services offered by the third party. If it is not within our legitimate interest, we will contact you to ask your permission, in which case our processing of such personal data will be based on your consent.</p>
<p><b>If you link to social media sites and interact with our social media pages</b></p>	<p>If you click on one of the social media links on our Service or otherwise interact with our social media pages such as on Facebook, LinkedIn, Slack or Instagram (including interacting with any 'like' or similar embedded features on our Service or social media accounts), we and the relevant social media platform may receive information relating to such interaction and may share your personal data in connection with this purpose, such as certain Behavioural Data and Technical Data. For more information about how we use this personal data, please see the "<a href="#">Insight, analysis and retargeting through Cookies</a>" section below.</p> <p>The relevant social media platform may also be a controller in respect of the personal data that is collected via your use of our social media pages and may use that personal data for additional purposes. For details of how the relevant social media platform uses your personal data, please see the privacy policy of the relevant social media platform.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest to use personal data in the ways described above to ensure that we provide the Service in an effective way and to promote our Service via social media.</p>
<p><b>If you have a general question or need help with any technical issues concerning our Service</b></p>	<p>There are various ways in which you are able to contact us (see the "<a href="#">How to contact us</a>" section above).</p> <p>When you make an enquiry, we will collect and process your Identity Data, Contact Data and, if applicable, certain Profile Data and Transaction Data, as well as any other personal data you volunteer that is relevant to your enquiry. If you have a technical issue concerning our Service, we may also collect</p>

	<p>and process Behavioural Data and Technical Data to help us diagnose the technical issues you are experiencing and to help us resolve them in an efficient way.</p> <p>We may also record (including voice recordings of telephone conversations) and use the information referred to above to train our personnel so that they can effectively deal with enquiries.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest to use your personal data in the ways described above to ensure that our Service is operating effectively and to enable us to help you with any enquiry you may have.</p>
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**Hosting and managing events. For more information see below.**

<p><b>If you sign up for and/or attend one of our events</b></p>	<p>From time to time, we may organise and host events for the purpose of promoting our Service or for charitable causes or other reasons. We may process your Identity Data and Contact Data to communicate with you about such events where you have specifically requested information about such events or where we have another lawful basis for sending that information to you.</p> <p>If you attend one of our events, we may use your Identity Data, Contact Data and certain Profile Data to record your attendance at the event and for related record-keeping purposes and, if relevant, we may collect and process any dietary requirements you may have. You may also feature in photographs taken at our events and such photographs may appear in publications that we make available.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is necessary for us to use your personal data in this way to perform our obligations in accordance with any contract that we may have with you where you have signed up to attend an event, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that the event is operated in an effective way.</p> <p>We may specifically ask your permission to use your photographs, quotes, testimonials, or other content that you make available or publish at the event. Where this is the case, our processing of your such personal data will be based on consent.</p>
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**Insight, analysis and retargeting through Cookies. For more information see below.**

<p><b>If we use cookies to help us understand more about you and your use of our</b></p>	<p>We and our third-party partners use cookies, web beacons, pixel tags and other similar technologies (which we generically refer to as "<b>Cookies</b>") to collect data from the devices that you</p>
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<b>Service</b>	<p>use to access our Service <b>and any emails that you receive from us</b>. The data that is collected includes Behavioural Data, Technical Data, and certain Profile Data. Please see our <a href="#">Cookie Policy</a> for further information, including details of our third-party partners.</p> <p>We and our third-party partners use this data to analyse how you use our Service and the effectiveness of our Service, including:</p> <ul style="list-style-type: none"><li>• for the purposes described in the <a href="#">“If we carry out any online personalised advertising”</a> section below;</li><li>• to analyse how you use, and the effectiveness of, our Service;</li><li>• to count users who have visited our Service <b>or opened an email</b> and collect other types of information, including insights about visitor browsing habits, which helps us to improve our Service <b>and the effectiveness of our emails</b>;</li><li>• to measure the effectiveness of our content;</li><li>• to learn what parts of our Service are most attractive to our users, which parts of our Service are the most interesting and what kind of features and functionalities our visitors like to see;</li><li>• to help us understand the type of marketing content that is most likely to appeal to our visitors and customers; and</li><li>• to help us to remember your preferences.</li></ul> <p><b>In some of our email messages, we use a “click-through URL” linked to certain websites administered by us or on our behalf. We may track click-through data to assist in determining interest in particular topics and measure the effectiveness of these communications.</b></p> <p><b><i>Our legal basis for processing</i></b></p> <p>Where your data is collected through the use of non-essential cookies, we rely on consent to collect your personal data and for the onward processing purpose. Please see our <a href="#">Cookie Policy</a> for further details.</p>
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**Advertising and marketing activities. For more information see below.**

<b>If we send you marketing communications by email</b>	<p>We use your Identity Data, Contact Data and Marketing and Communications Data to send you (or the organisation you represent) marketing communications by email. Our marketing will include information about us, our Service, and any events we may hold from time to time.</p> <p>Our marketing communications will include personalised and non-personalised marketing. Personalised marketing has been specifically tailored to you and will include content that we think is most relevant to you, based on what we know about you. Non-personalised marketing is marketing that is</p>
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	<p>not tailored to you.</p> <p>Where we are sending you personalised marketing, we may also use Profile Data, Transaction Data and Behavioural Data to help us decide what sort of personalised marketing to send you (please see the "<a href="#">Insight, analysis and retargeting through Cookies</a>" section above for more details).</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interest to use your personal data for marketing purposes, for example to decide what marketing content we think may appeal to you.</p> <p>However, we will only send marketing communications to you by email where you have consented to receive such content by email, or where we have another lawful right to send marketing to you using email. For example, in certain circumstances we may rely on our legitimate interest to send marketing by email to Client Users of our Service</p>
<p><b>If we carry out any online personalised advertising</b></p>	<p>We and our third party partners may use your Profile Data, Behavioural Data and Technical Data and other data that is collected through your interactions with third party websites and services to provide you with, and analyse the effectiveness of, personalised ads when you visit other websites and/or use other services.</p> <p>By "personalised ads", we mean advertisements for our Service based on your browsing habits, although our third-party partners may use the data that is collected to show personalised ads for products and services offered by third parties.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>Please see the "<a href="#">Insight, analysis and retargeting through Cookies</a>" section above to learn about the legal basis that we rely on to collect data via the use of Cookies.</p> <p>Where we use your personal data to display online personal advertising to you, we rely on the consent that you have provided in respect of the collection of such data, or it is otherwise in our legitimate interests to promote our Service to you.</p> <p>Our third-party partners may rely on a different lawful basis in respect of their use of your personal data. Please read the privacy notice of the relevant third-party provider, as set out in our Cookie Policy and/or our Cookie preference centre.</p>
<p><b>If we advertise to other people who share similar interests and characteristics to you</b></p>	<p>We will provide your personal data to third-party providers of other services as described in the "<a href="#">Insight, analysis and retargeting through the use of Cookies</a>" section. If you are a user of those third-party services, we may ask the third-party providers of those services to find other registered users of their services who share similar interests and characteristics to you, which will be based on information that the third party</p>

	<p>holds about you and its other registered users.</p> <p>This is known as “lookalike” audience advertising because we are trying to show our advertising to people who “look like” you.</p> <p>Please note that such activity is also subject to the privacy choices you have elected to make on such third-party services.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interests to share your personal data with the third-party providers of other services so that we can advertise our Service to other individuals that use those services and share similar interests and characteristics with you, although where this activity is undertaken through the use of Cookies please see the “<u><a href="#">Insight, analysis and retargeting through Cookies</a></u>” section above) to learn about the legal basis that we rely on. You can opt-out of our sharing of your personal information with the third-party providers by exercising <a href="#">your rights as a data subject</a> as set out below.</p>
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**Internal recruitment. For more information see below.**

<p><b>If we use your personal data in connection with our recruitment activities</b></p>	<p>We use your personal data for internal recruitment purposes, in particular, to assess your suitability for any of our positions that you apply for, whether submitted directly by you or by a third-party recruitment agency on your behalf. We also use your Identity Data and Contact Data to communicate with you about the recruitment process, to keep records about our recruitment process and to comply with our legal and regulatory obligations in relation to recruitment.</p> <p>We will process any personal data about you that you volunteer, including during any interview, when you apply for a position with us. We may also process your personal data obtained from any third parties we work with in relation to our recruitment activities, including without limitation, recruitment agencies, background check providers, credit reference agencies and your referees.</p> <p>The personal data we process may include your Identity Data, Contact Data, Registration Data, details of your education, qualifications and employment history, any other personal data which appears in your curriculum vitae or application, any personal data that you volunteer during an interview or your interactions with us, or any personal data which is contained in any reference about you that we receive. Such information may also include special categories of personal data (such as information about your health, any medical conditions and your health and sickness records) and information relating to criminal convictions and offences if that information is relevant to the role you are applying for.</p> <p>We also use your personal data for the purposes of reviewing</p>
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	<p>our equal opportunity profile in accordance with applicable legislation. We do not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation. All employment-related decisions are made entirely on merit.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>Where we use your personal data in connection with recruitment, it will be in connection with us taking steps at your request to enter into a contract we may have with you or it is in our legitimate interest to use personal data in such a way to ensure that we can make the best recruitment decisions.</p> <p>We will not process any special (or sensitive) categories of personal data or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with your explicit consent.</p>
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**Receipt of products and services from our suppliers. For more information see below.**

<p><b>If we have engaged you or the organisation you represent to provide us with products or services</b></p>	<p>If we have engaged you or the organisation you represent to provide us with products or services (for example, if you or the organisation you represent provide us with services such as IT support or financial advice), we will collect and process your personal data in order to manage our relationship with you or the organisation you represent, to receive products and services from you or the organisation you represent and, where relevant, to provide our Service to others. The personal data we collect from you may include your Identity Data and Contact Data and any other personal data you volunteer which is relevant to our relationship with you or the organisation you represent.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you or the organisation you represent, or it is in our legitimate interest to use personal data in such a way to ensure that we have an effective working relationship with you or the organisation you represent and are able to receive the products and services that you or your organisation provides, and provide our Service to others, in an effective way.</p>
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**Security. For more information see below.**

<p><b>If we need to use your personal data in connection with the administration of our security measures</b></p>	<p>We have security measures in place at our premises, including CCTV and building access controls. There are signs in place showing that CCTV is in operation. The images captured are securely stored and only accessed on a need to know basis (e.g. to look into an incident). CCTV recordings are typically automatically overwritten after a short period of time unless an issue is identified that requires investigation</p>
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	<p>(such as a theft).</p> <p>We may require visitors to our premises to sign in on arrival and where that is the case we will keep a record of visitors for a short period of time. Our visitor records are securely stored and only accessible on a need-to-know basis (e.g. to look into an incident).</p> <p><b><i>Our legal basis for processing</i></b></p> <p>It is in our legitimate interests to process your personal data so that we can keep our premises secure and provide a safe environment for our personnel and visitors to our premises.</p>
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**Business administration and legal compliance. For more information see below.**

<p><b>If we need to use your personal data to comply with our legal obligations or in connection with the administration of our business</b></p>	<p>We may use your personal data: (i) to comply with our legal obligations; (ii) to enforce our legal rights; (iii) to protect the rights of third parties; and (iv) in connection with a business transition such as a merger, reorganisation, acquisition by another company, or sale of any of our assets.</p> <p><b><i>Our legal basis for processing</i></b></p> <p>Where we use your personal data in connection with a business transition, to enforce our legal rights or to protect the rights of third parties, it is in our legitimate interest to do so. For all other purposes described in this section, we have a legal obligation to use your personal data to comply with any legal obligations imposed upon us, such as a court order.</p> <p>We will not process any special (or sensitive) categories of personal data or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with your explicit consent.</p>
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**8 IF YOU FAIL TO PROVIDE YOUR PERSONAL DATA**

Where we are required by law to collect your personal data, or we need to collect your personal data under the terms of a contract we have with you, and you fail to provide that personal data when we request it, we may not be able to perform the contract we have or are trying to enter into with you. This may apply where you do not provide the personal data we need in order to provide the Services you have requested from us or to process an application to register an account. In these circumstances, we may have to cancel your application or the provision of the relevant Services to you, in which case we will notify you.

**9 HOW WE OBTAIN YOUR CONSENT**

Where our use of your personal data requires consent, you can provide such consent at the time we collect your personal data following the instructions provided, or by informing us using the contact details set out in the "[How to Contact Us](#)" section above.

**10 THIRD-PARTY LINKS**

This Privacy Notice only applies to personal data processed by us through your use of our Service and/or in connection with our business operations. However, from time to time, our Service may contain links to third-party websites and services. We have no control over these websites and services and this Privacy Notice does not apply to your interaction with the relevant third parties.

When you use a link to go from our Service to another website (even if you don't leave our Service) or you request a service from a third party, your browsing and interactions on any other websites, or your dealings with any other third-party service provider, is subject to that website's or third-party service provider's own rules and policies. For example, our Service invites you to connect with us on social media platforms such as Facebook and Instagram. When you click on the links we provide to such third-party platforms, you will be transferred from our Service to the relevant third-party platform and the privacy notice (and other terms and conditions) of that platform will apply to you.

We do not monitor, control or endorse the privacy practices of any third parties. We encourage you to become familiar with the privacy practices of every website you visit or third-party service provider that you use in connection with your interaction with us and to contact them if you have any questions about their respective privacy notices and practices.

**11 SHARING PERSONAL DATA**

We only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations. For more information **see below**.

*When processing your personal data, we may need to share it with third parties, as set out in the table below. This list is non-exhaustive and there may be circumstances where we need to share personal data with other third parties.*

<b>Clients</b>	<i>Where you are a Candidate User, we may share your personal data with our clients as described above in the <u>Use of Our Service by Candidate Users</u> section.</i>
<b>Third-party suppliers who provide applications/ functionality, data processing or IT services</b>	<i>We share personal data with third parties who support us in providing our Service and help provide, run and manage our internal IT systems. Such third parties may also include, for example, providers of information technology, cloud-based software-as-a-service providers, website design, hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them. We also share your personal data with third-party service providers to assist us with insight analytics. These providers are described in our <u>Cookie Policy</u>.</i>
<b>Payment providers and banks</b>	<i>We share personal data with third parties who assist us with the processing of payments and refunds.</i>
<b>Payroll, HR and onboarding service providers</b>	<i>We share personal data with third-party service providers who assist us with providing our Service.</i>
<b>Advertising partners</b>	<i>We share personal data with third party advertising partners, including those set out in our <u>Cookie Policy</u> [and/or our <u>Cookie preference centre</u>] when you use our Service. This data is used to provide you with, and measure the effectiveness of, online personalised advertising and for other advertising related activities.</i>
<b>Event partners and suppliers</b>	<i>When we run events, we will share your personal data with third-party service providers that are assisting us with the operation and administration of that event. If we are running</i>

	<i>an event in partnership with other organisations, we will share your personal data with such organisations for use in relation to the event.</i>
<b>Auditors, lawyers, accountants and other professional advisers</b>	<i>We share personal data with professional services firms who advise and assist us in relation to the lawful and effective management of our organisation and in relation to any disputes we may become involved in.</i>
<b>Law enforcement or other government and regulatory agencies and bodies</b>	<i>We share personal data with law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with, applicable law or regulation.</i>
<b>Other third parties</b>	<i>Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, or to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.</i>

## 12 TRANSFERS OUTSIDE THE UK AND THE EUROPEAN ECONOMIC AREA (“EEA”)

Where necessary in order to provide our Service, we will transfer personal data to countries outside the UK and the EEA.

Non-EEA countries do not have the same data protection laws as the UK and the EEA. In particular, non-EEA countries may not provide the same degree of protection for your personal data, may not give you the same rights in relation to your personal data and may not have a data protection supervisory authority to help you if you have any concerns about the processing of your personal data. However, when transferring your personal data outside the UK or the EEA, we will comply with our legal and regulatory obligations in relation to your personal data, including having a lawful basis for transferring personal data and putting appropriate safeguards in place to ensure an adequate level of protection for the personal data. We will take reasonable steps to ensure the security of your personal data in accordance with applicable data protection laws. For more information **see below**.

*When transferring your personal data outside the UK or the EEA, we will, where required by applicable law, implement at least one of the safeguards set out below. Please contact us if you would like further information on the specific mechanisms used by us when transferring your personal data outside the UK or the EEA.*

<b>Adequacy decisions</b>	We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK government and/or European Commission.
<b>Standard Contractual Clauses</b>	Where we use certain service providers, we may use specific contracts approved by the ICO and/or the European Commission which give personal data the same protection it has in Europe.

## 13 HOW LONG WE KEEP YOUR PERSONAL DATA

In respect of personal data that we process in connection with the supply of our Service, we may retain your personal data for up to six years from the date of supply of the Service and in compliance with our data protection obligations. We may then destroy such files without further notice or liability.

Where we process personal data in connection with your registration as a Candidate User, we may retain your personal data for as long as you are registered as a Candidate User and for the purposes described in this Privacy Notice (in particular the purposes described in the *Use of Our Service by Candidate Users* section as long as reasonably necessary to comply with any contract we may have with you or so that we can introduce you to opportunities in the future that we think might be of interest to you (and in compliance with our data protection obligations). We may then destroy such files without further notice or liability.

Where we process any other personal data, we will retain relevant personal data for up to three years from the date of our last interaction with you (and in compliance with our data protection obligations). We may then destroy such files without further notice or liability.

If any personal data is only useful for a short period (e.g. for a specific activity, promotion or marketing campaign), we will not retain it for longer than the period for which it is used by us.

If you have opted out of receiving marketing communications from us, we will need to retain certain personal data on a suppression list indefinitely so that we know not to send you further marketing communications in the future. However, we will not use this personal data to send you further marketing unless you subsequently opt back in to receive such marketing.

#### 14 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL DATA

We are committed to keeping the personal data you provide to us secure and we have implemented information security policies, rules and technical measures to protect the personal data under our control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. In addition, all our employees and data processors (i.e. those who process your personal data on our behalf) are obliged to respect the confidentiality of the personal data of all users of our Service.

#### 15 PERSONAL DATA OF MINORS

Our Service is not intended for use by, or targeted at, minors (individuals under the age of 18) and we do not knowingly collect personal data of minors.

If you are under the age of 18, you must not use our Service and you must not provide us with any personal information. If we discover that we are holding the personal data of a minor, we will delete that information as soon as possible. Please contact us if you have reason to believe that a minor may have submitted personal data to us (see the [“How to contact us”](#) section above).

#### 16 YOUR RIGHTS AS A DATA SUBJECT

You have certain rights in relation to the personal data we hold about you. These rights include the right: (i) to obtain copies of your personal data; (ii) to have your personal data corrected or deleted; (iii) to limit the way in which your personal data is used; (iv) to object to our use of your personal data; (v) to transfer your personal data; (vi) not to be subject to decisions based on automated processing (including profiling); and (vii) to complain to a supervisory authority. If you would like to exercise any of these rights, please contact us using the details set out in the [“How to Contact Us”](#) section above. For more information, **see below**.

<b>Your right of access</b>	If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may charge a reasonable fee for producing those additional copies.
<b>Your right to rectification</b>	If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal data with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we've

	shared your personal data with so that you can contact them.
<b>Your right to erasure</b>	You can ask us to delete or remove your personal data in some circumstances, such as where we no longer need it or where you withdraw your consent (where applicable). If we have shared your personal data with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal data with so that you can contact them directly.
<b>Your right to restrict processing</b>	You can ask us to “block” or suppress the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal data or you object to us processing it for a particular purpose. This may not mean that we will stop storing your personal data but, where we do keep it, we will tell you if we remove any restriction that we have placed on your personal data to stop us processing it further. If we’ve shared your personal data with others, we’ll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we’ll also tell you who we’ve shared your personal data with so that you can contact them directly.
<b>Your right to data portability</b>	You have the right, in certain circumstances, to obtain personal data you have provided to us (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer it to your chosen third party.
<b>Your right to object</b>	You can ask us to stop processing your personal data, and we will do so, if we are: (i) relying on our own or someone else’s legitimate interest to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or (ii) processing your personal data for direct marketing purposes.
<b>Your rights in relation to automated decision-making and profiling</b>	You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for the entering into, or the performance of, a contract between you and us.
<b>Your right to withdraw consent</b>	If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time. You can exercise your right of withdrawal by contacting us using our contact details in the <a href="#">“How to Contact Us”</a> section above or by using any other opt-out mechanism we may provide, such as an unsubscribe link in an email.
<b>Your right to lodge a complaint with the supervisory authority</b>	If you have a concern about any aspect of our privacy practices, including the way we have handled your personal data, please contact us using the contact details provided in the <a href="#">“How to Contact Us”</a> section above. You can also report any issues or concerns to a national supervisory authority in the Member State of your residence or the place of the

	<p>alleged infringement.</p> <p>As we are incorporated in the United Kingdom, our regulatory authority is the Information Commissioner's Office ("<b>ICO</b>"). Contact details for the ICO can be found on its website at <a href="https://ico.org.uk">https://ico.org.uk</a>.</p>
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