



## Privacy Policy

VizCareer is : VizCareer Digital Ltd. We have our registered office 2 Walker Street, Edinburgh, EH3 7LB, Company Registration Number: SC582962

### Introduction

Welcome to VizCareer's Privacy Notice.

VizCareer respects your privacy and is committed to protecting your personal data. This Privacy Notice will inform you as to how we look after your personal data when you use our app or visit our website (regardless of where you visit it from), and tell you about your privacy rights and how the law protects you.

If you are unsure of the meaning of some of the terms used in this Privacy Notice, we have provided a Glossary to help you to understand these.

Important information and who we are

Purpose of this privacy notice

This Privacy Notice aims to give you information on how VizCareer collects and processes your personal data through your use of our app and website, including any data you provide when registering and posting a job or applying for an advertised role on our website.

Our app and website is not intended for children aged under 16 and we do not knowingly collect data relating to children. It is a condition of use that all VizCareer users are aged 16 or above.

It is important that you read this Privacy Notice together with any other privacy notice or fair processing notice so that you are fully aware of how and why we are using your data. This Privacy Notice should be read together with our Website Terms & Conditions and our User Term & Conditions.



## **Controller**

VizCareer is the controller and is responsible for your personal data (collectively referred to as VizCareer, “we”, “us” or “our” in this Privacy Notice).

We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact our data privacy manager using the details set out below:

### ***Contact Details***

Full name of legal entity: VizCareer Digital Ltd

Name of Data Privacy Manager: Debbie Stewart

Email address: Debbie.stewart@vizcareer.com

Postal address: 20 Trongate, Tontine, Glasgow, G1 5NA

You have a right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Changes to the privacy notice and your duty to inform us of any changes**

This version was last updated on 28<sup>th</sup> November 2018. We may make changes to this Privacy Notice from time to time and, if appropriate, will notify you by email regarding changes. Remember, continued use of our app or website will amount to acceptance of our new terms.

It is important that the personal data we hold about you is accurate and current. We would ask that you keep us informed if your personal data changes during your relationship with us.



### **Third-party Links**

Our website and app may include links to third-party websites, plugins and applications. Clicking on those links (for example, a link to our Facebook page) may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice on every website you visit.

### **Blogs**

From time to time, our website will feature public blogs. Any information you include in a comment on our blog may be read, collected and used by anyone. If your personal information appears on our blogs and you would like it to be removed, please contact us.

### **The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

*Identity data* includes first name, maiden name, last name, username or similar identifier, date of birth and gender.

*Contact Data* includes email address and telephone numbers.

*Technical Data* includes Internet protocol (IP) address, your login data, browser type and version, operating platform, timezone setting and geolocation. Each time you use our site, we may automatically collect information, including the type of mobile device you use, a unique device identifier (for example, your device's IMEI number, the MAC address of the device's wireless network interface and the mobile phone number used on the device), your mobile operating system and the type of mobile browser you use.

*Profile Data* includes your username and password, feedback and survey responses.

*Usage Data* includes information about how you use our website, app and services.



*Marketing and Communications Data* includes your preferences in receiving any marketing from us and our third parties and our communication preferences.

We also collect, use and share *Aggregated Data* such as statistical or demographic data for any purpose. Aggregated Data may be derived from your physical data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic biometric data). Nor do we collect any information about criminal convictions and offences.

#### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with the VizCareer's services to allow you to apply for a role or to upload a vacancy). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

#### **How is your personal data collected?**

We use different methods to collect data from and about you including through:

*Direct interactions.* You may give us your Identity, Contact and other Data when you sign up to our site or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: create an account to upload or apply for a role.

*Automated technologies or interactions.* As you interact with our website and app, we may automatically collect Technical Data about your equipment, browsing action and patterns. We collect this data by using cookies and other similar technologies.



## **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Where we need to perform the contract we are about to enter into or have entered into with you.

Where it is necessary for our legitimate interests (or those of a third-party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

See the Glossary of this notice to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email. You have a right to withdraw consent to marketing at any time by contacting our Data Protection Manager (details above).

## **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a VizCareer User	(a) Identity (b) Contact (c) Financial	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy. (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing & Comms	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (b) Necessary to comply with a legal obligation
To administer and protect our business and our website/app group restructuring exercise) (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or (b) Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or understand the effectiveness this service	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Comms (f) Technical	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, app, services,	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services,



to keep our website and app updated and relevant, to develop our business and to inform our marketing strategy) customer relationships and experiences

To de-identify you data (anonymise or aggregate)

- (a) Identity
- (b) Contact
- (c) Profile
- (d) Marketing & Comms
- (e) Transaction
- (f) Technical
- (g) Usage
- (h) Financial

Necessary for our legitimate interests (to increase data security and protection, to grow our business)

To make suggestions and recommendations to you about goods or services that may be of interest to you

- (a) Identity
- (b) Contact
- (c) Technical
- (d) Usage
- (e) Profile

Necessary for our legitimate interests (to develop our products/services and grow our business)

### **Marketing & Emails**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. When we send you emails we may include “single pixel gifs” to help us to track information like if, and when, you open an email from us. You can change your email settings with us so that we can’t do this by using the contact details above.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. In addition we may send you messages about technical issues (e.g. planned outages, changes to our policies or to communicate with you about your VizCareer account).



### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third-party company for marketing purposes.

### **Opting out**

You can ask us to stop sending you messages by contacting us at any time. Please use the contact details listed at the beginning of this Privacy Notice.

### **Cookies**

When you register with VizCareer we store “cookies”, which are strings of code on your computer. We use those cookies to collect information, including when you visit our website or use our services, your browser type and version, and other similar information.

We also use analytical cookie files. These allow us to recognise and count the number of visitors and to see how visitors move around our website when they’re using it. This all helps us to improve how our website works!

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies.

If you wish to delete any cookie files, please refer to the instructions on your file management software to locate the file or the directory that stores cookies. Our cookies will contain the domain name VizCareer.com within the file name.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.





### **Disclosures of your personal data**

We may have to share your personal data with third parties for the various purposes set out in the table in part 4 of this Privacy Notice. The internal and external third parties we may share your personal data with are listed in the Glossary.

We may also share your personal data with third parties to whom we may choose to sell, transfer, or merge parts of our business or assets with. Alternatively, we may seek to acquire other businesses to merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **International Transfers**

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data may involve a transfer outside the EEA.

Where we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

Where we use certain service providers, we may use specific contacts approved by the European Commission which give personal data the same protection as it has in Europe.

Where we use providers based in the US, we may transfer data to them if they are party of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data outside the EEA.



## **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Because security is so important to us, we use Amazon Web Services (AWS) and Cognito to secure your data. All data is encrypted including any passwords, if you forget and need to reset your password encryption is such that no third party, including VizCareer, can access your data. AWS is recognised worldwide as a software and cloud provider. For more information on AWS and the protection offered please view their site and terms and conditions.

We have put in place internal procedures to deal with any suspected personal data breach and will notify you and any applicable regulatory of a breach where we are legally required to do so.

## **Data Retention**

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of personal data, the potential harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see “Request Erasure” below for further information on this.

In some circumstances we may anonymise your personal data (so it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.



### **Your legal rights**

Under certain circumstances you have rights under data protection laws in relation to your personal data. We have included an overview of these rights in the Glossary of this Privacy Notice.

If you wish to exercise any of these rights, please contact our Data Protection Manager.

#### **No fee usually required.**

You will not have to pay a fee to access your personal data (or to exercise any of the rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or if you have a number of requests. In this case, we will notify you and keep you updated.



## **Glossary**

### **LAWFUL BASIS**

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **THIRD PARTIES**

We may share your information with selected third parties including business partners, suppliers, sub-contractors and service providers for the performance of our contract with you.

We may also share your data where we are under a duty to disclose or share your personal information in order to comply with a legal obligation, or in order to enforce our Website Terms & Conditions and our User Terms & Conditions.

### **YOUR LEGAL RIGHTS**

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.



Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.