#### . Introduction

1.1 We are committed to safeguarding the privacy of our Website visitors, Applicants and Clients. This Privacy Policy sets out how The Hire Hub Careers Ltd (hereinafter "**The Hire Hub** ", "**we** ", "**us** ", "**our**"), collects, shares and uses information about you when you visit our website ("**Website**"), and how you can exercise your privacy rights. If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Policy.

# 2. What does The Hire Hub do?

2.1 The Hire Hub is headquartered in the United Kingdom and helps to connect employers and job candidates through our online platform.

# 3. What information do we collect and how do we use it?

# 3.1 Information you give us.

3.1.1 You may give us information, including information that can identify you ("**personal information** ") when you use our website to recruit candidates. We will also collect information from you when you correspond with us.

3.1.2 If you are a candidate, you may provide personal information such as your name, address, email address and telephone number, and other relevant information such as education and employment history. If you have uploaded your CV or created an Account on our Website (including our employer microsites) we will retain that information and use it to suggest other jobs to you which you may be interested in unless you tell us otherwise. If you consent, we may also collect information such as ethnicity and sexual orientation to help employers monitor the diversity of their employees, but this information will be anonymised and will not affect your application.

3.1.3 If you are an employer searching for candidates, you will register an account with us in which we will collect information such as your name, job title, billing address and payment information.

3.1.4 If you subscribe to receive our newsletters and/or email notifications, then you will provide us with your name, email address, and other relevant information.

3.1.5 The personal information that you provide to us will be used for the purposes of enabling you to use our website and receive our services, for administrative and troubleshooting purposes and in order to send you marketing materials. This includes but is not limited to using your information to contact you about candidates you may be interested in, send statements and invoices to you, dealing with enquiries and complaints made by or about you relating to the Website and our services, and to collect payments from you. As explained in Information we receive from other sources below, we may also use this information for further purposes when combined with other data we collect about you.

3.1.6 Please note that we will not store your payment information, this will be done via a third party payments company.

#### 4.1 Information we collect automatically.

4.1.1 When you visit our Website, we may automatically collect the following information from your device: your IP address, log-in information, location information, browser type and version, operating system, referral source, information about your visit including the URL clickstream to, through and from our Website, length of visits to certain pages and page interactions, page views, products you searched for or viewed and download errors. We collect information automatically through the use of various technologies, including through "cookies".

4.1.2 We use the information we collect automatically: (i) to administer our Website for internal operations including troubleshooting purposes; (ii) to ensure that content from our Website is presented in the most effective manner for you and your devices; (iii) as part of our effort to keep our Website safe and secure; (iv) to measure or understand the effectiveness of advertising and job applications we serve to you and others, and to deliver relevant advertising and job applications to you; and (v) to make suggestions and recommendations to you and other users of our Website about goods or services that may interest you or them.

#### 4.2 Information we receive from other sources.

4.2.1 From time to time, we may receive personal information about you from third party sources such as advertising networks, analytics providers, social media organisations and credit reference agencies, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

4.2.2 The types of information we collect from third parties may include generic socio-demographic information, preferences, avatars and we use the information we receive from these third parties to learn more about your preferences as our customer, enhance your user experience on our website and for providing you with information, content and offerings tailored to your needs.

#### 5. Who do we share personal information with?

5.1 We may disclose your personal information to the following categories of recipients:

 $\cdot$  to **candidates** and **employers** in connection with jobs advertised on our website that you are recruiting or applying for.

• to our **group companies, third party services providers and partners** who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our website), or who otherwise process personal information for purposes that are described in this Privacy Policy or notified to you when we collect your personal information.

 $\cdot$  to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter

of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.

• to an actual or **potential buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy.

• to any **other person with your consent** to the disclosure.

# 6. Legal basis for processing your personal information

6.1 Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

6.2 However, we will normally collect personal information from you only (i) where we need the personal information to perform a contract with you, (ii) where the processing is in our legitimate interests and not overridden by your rights, or (iii) where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

6.3 If we ask you to provide personal information to comply with a legal requirement or to perform a contact with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

6.4 If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our Website, enable you to recruit a candidate and communicate with you as necessary to provide our services to you, respond to your queries, improve our platform, undertake marketing, or for the purposes of detecting or preventing illegal activities. We may have other legitimate interests and, if appropriate, we will make clear to you at the relevant time what those legitimate interests are.

6.5 If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the <u>Contact</u> section.

# 7. Third party websites

7.1 Where we provide links to other websites, we do so for information purposes only. The other websites are outside our control and are not covered by this Policy. If you access other websites using the links provided, the operators of these websites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours.

7.2 On some pages of our website, third parties that provide content, applications or plug-ins through our website may track your use of content, applications and plug-ins or customize content, applications and plug-ins for you. For example, when you share an article using a social media sharing button on our website (e.g., Facebook, Twitter, or Google Plus), the social network that has created the button will record that you have done this. Further details can be found in our Cookie Notice.

# 8. Data Retention

8.1 We will not retain your information for longer than is necessary for our legitimate business purposes such as storing your information for future applications and marketing our services to you. However, please be advised that we may retain some information after you have closed your Account with us, for instance if doing so is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.

8.2 When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

# 9. Marketing

9.1 In order to keep you updated we may send you our newsletter and other communications regarding content, services, offers, promotions and events from us, our affiliates and partners via email. These communications are to provide welcome and engagement communications, updates about other users with whom you are connected and their services or job availabilities; recommendations about skills, needs and content that may be relevant to you and your requirements; events; or other communications about job opportunities that we think may be of interest to you. These messages will be sent to you based on your profile information and your messaging preferences. You can opt-out of marketing at any time. For further details see <u>Your Rights</u> below.

# 10. International data transfers

10.1 Given that the Internet is a global environment, using the Internet to collect and process personal information necessarily involves the transmission of data on an international basis. While we generally store all of the personal information that we collect about you through our website on our servers in the United Kingdom, it is possible that your personal information will be transmitted to parties outside your region (where data protection laws may be different), for example we use service providers in Europe.

10.2 Where your information is transferred outside of the European Economic Area we take appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy and data protection law. These include implementing the European Commission's Standard Contractual Clauses, copies of which can be provided upon request.

# 11. Security of your personal information

11.1 We apply appropriate technical and organisational precautions to protect your personal information that is under our control from unauthorised access,

collection, use, copying, modification or disposal, to prevent the loss, misuse or alteration of your personal information. We will store all the personal information you provide on our secure (password- and firewall- protected) servers. All electronic transactions you make to or receive from us may be encrypted.

11.2 Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

#### 12. Use of this Website by minors

12.1 Our Website is not directed at children younger than 16. We do not knowingly collect information from minors who are under 16 and we will cease to process and delete any such information as soon as we find out. If you have any queries about this, please contact us using the contact details provided under the Contact heading below.

#### 13. Your rights

13.1 You have certain data protection rights which you can exercise using the contact details provided under the Contact heading below. Your rights include the right to:

• access, correct, update or request deletion of your personal information. Note that if you have chosen to have an Account then you can access some of the personal information, we hold about you via your Account to obtain a copy of it and to correct, amend, or delete information that is inaccurate. You can also close your Account at any time.

• **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information.

• if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

13.2 You also have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the Contact heading below.

13.3 You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

13.4 We will endeavour to respond to your request within an appropriate timeframe and, in any event, within any timescales required by law. We may withhold such personal information to the extent permitted by law.

#### 14. Privacy Policy amendments

14.1 This Policy was last updated on 01 January 2025. We may update this Policy from time-to-time by posting a new version on our website. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

#### 15. Contact Us

Phone: 01322 687600 Email: connect@thehirehub.careers

