

## Recruiting Privacy Notice

**Zoovu** (as below defined, hereinafter: “We”, “Us”) are committed to respecting your privacy and protecting your personal data. This Recruiting Privacy Notice (“Privacy Notice”) describes how we handle and protect your personal data in connection with Zoovu’s recruiting processes and programs. In case of a conflict between this Privacy Notice and applicable law, applicable law will govern.

Privacy Notice (together with any other documents referred to herein) sets out the basis on which the personal data collected from you, or that you provide to Us, will be processed by Us in connection with Our recruitment processes. Please read the following carefully to understand Our views and practices regarding your personal data and how We will treat it.

By submitting your personal data to us, you acknowledge that:

- You have read and understood this Privacy Notice.
- Your personal data may be transferred and processed outside the EEA/UK, for the purposes and in the manner specified in this Privacy Notice. Please see the section “Where we process your personal data” below.
- We need to process your data in order to be able to continue your candidacy for the job for which you have applied.
- All of your representations are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing any inaccurate information may make you ineligible for employment.
- This Privacy Notice does not form part of any contract of employment offered to candidates hired by Zoovu.

For the purpose of the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), hereinafter: “GDPR”) and the UK GDPR the Data Controller is **Zoovu Limited**, address: 27 Old Gloucester Street, London, WC1N 3AX, United Kingdom, company number: 11536298.

We use Clear Company, an online application provided by Clear Company Inc., to assist with Our recruitment process. We use Clear Company to process personal information as a data processor on Our behalf.

Clear Company is only entitled to process your personal data in accordance with Our instructions.

Where you apply for a job opening posted by Us, these Privacy Notice provisions will apply to Our processing of your personal information. Other privacy policies may apply if we process your personal data in another role. Notably, successful candidates who get employed with us would become subject to our Employee Privacy Policy. Our **general privacy policy** will apply in addition to this policy where you are using our website.

Where you apply for a job opening via the application function on a job site or similar online service provider (“Partner”), you should note that the relevant Partner may retain your personal data and may also collect data from Us in respect of the progress of your application. Any use by the Partner of your data will be in accordance with the Partner’s Privacy Notice.

## Your Personal Information

### Information we collect from You

We collect and process some or all of the following types of information from you:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, We process personal details such as name, email address, address, telephone number, date of birth, qualifications, experience, information relating to your employment history, skills experience that you provide to Us, as well as your video in case you conduct your interview using the Video Interview feature.
- If you contact Us, We may keep a record of that correspondence.
- A record of your progress through any hiring process that We may conduct.
- Details of your visits to Clear Company’s Website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to Clear Company’s Website and the resources that you access.

## Information we collect from other sources

Clear Company provides Us with the facility to link the data you provide to Us, with other publicly available information about you that you have published on the Internet – this may include sources such as LinkedIn.

Clear Company's technology allows Us to search various databases – some publicly available and others not, which may include your personal data (include your CV or Resumé), to find possible candidates to fill Our job openings. Where We find you in this way We will obtain your personal data from these sources.

We may receive your personal data from a third party who recommends you as a candidate for a specific job opening or for Our business more generally.

## Legal basis for processing your personal data

We process your personal data as part of entering into the contract of employment.

Our processing of your personal data for the purposes mentioned above is based:

- in part, on our legitimate business interests in evaluating your application to manage our relationship with you, to ensure that we recruit appropriate employees, and to evaluate and maintain the efficacy of our recruiting process more generally;
- in part, on our performing contractual and precontractual measures relating to our potential employment relationship with you;
- in part, on our complying with applicable law with regard to personal data necessary to satisfy our legal and regulatory obligations, including with regard to public health and workplace safety;
- in part, on your consent, if we offer you the opportunity to participate in our optional recruiting programs or if we collect sensitive personal data for legally permitted purposes other than compliance with our legal obligations regarding public health and workplace safety.

We may ask for your consent in other cases where we process your data.

Such consent can be withdrawn at any time by contacting us at [legal@zoovu.com](mailto:legal@zoovu.com)

## **Background screening**

If you receive an offer from us, we may conduct a background check on you or instruct a third party to do so on our behalf. Background screening will only be done where permitted by the law applicable to the location where the position is located and to the extent necessary and proportionate to the role that you are being offered.

Our legal basis for background screening is our need to perform precontractual measures related to establishing our employment relationship. If a background screening is required, you may be contacted by a third-party background screening service provider to request authorization for the release of your information, and at that time you will be provided with further information about the process and what personal data it might involve.

## **Purposes of processing**

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the recruitment process.
- To find appropriate candidates to fill Our job openings.
- To help Our service providers (such as Clear Company and its processors and data providers) and Partners (such as the job sites through which you may have applied) improve their services.

## **Automated decision making/profiling**

We may use Clear Company's technology to select appropriate candidates for Us to consider based on criteria expressly identified by us, or typical in relation to the role for which you have applied. The process of finding suitable candidates is automatic, however, any decision as to who We will engage to fill the job opening will be made by Our staff so there is no automated decision-making involved in this process.

## **Disclosure of Your Information**

As set out above, We pass your information to Our third party service providers such as applicant tracking systems, including Clear Company, who use it only in accordance with Our instructions and as otherwise required by law. We may also use other third-party providers such as storage providers, analytics providers and communications providers.

## **How We Store Your Personal Data Security**

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so.

## **Where We Store Your Personal Data**

Where We store your personal data in Our own systems, it is stored European Economic Area.

The data that We collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for Us or for one of Our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your orders, the processing of your payment details and the provision of support services.

In particular, your data may be accessible to i) Clear Company’s staff in the USA or ii) may be stored by Clear Company’s hosting service provider on servers in the USA as well as in the EU. The USA does not have the same data protection laws as the United Kingdom and EEA.

A Data Processor Agreement has been signed between Clear Company Software Limited and its overseas group companies, and between Clear Company and each of its data processors. These data processor agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

In case we needed to transfer your data to parties located outside of the UK or the EEA, we shall undertake an assessment and take appropriate measures to ensure such third party will provide adequate security of such personal data and respect your rights to privacy. These safeguards are intended to ensure a similar degree of protection is afforded to your data wherever it may be transferred and may include:

- only transferring your personal data to countries which have been deemed to provide an adequate level of protection for personal data by the European Commission and/or the ICO; and/or
- entering into specific contractual terms which have been approved by the European Commission and/or the ICO and which give personal data the same protection as within the EU/UK/EEA/Switzerland.

If you would like further information please contact Us (see 'Contact' below).

## Data retention

If you accept an offer of employment with us, any relevant personal data collected during your pre-employment period will become part of your personnel records and will be retained in accordance with specific country requirements and with the privacy notice applicable to Zoovu employees, which will be provided during the on-boarding process.

If we do not employ you, we may nevertheless continue to retain and use your personal data for 6 months (this period may vary depending on the applicable law in the relevant country) for system administration purposes, to consider you for potential future roles, and to perform research.

Thereafter, we retain a minimal amount of your personal data to record your recruiting activity with us.

Your personal information will be deleted on one of the following occurrences:

- deletion of your personal information by you (or by another person engaged by the Customer) where enabled; or
- receipt of a written request by you to us.

## Your rights

Under the GDPR and the UK GDPR you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address
- require Us to correct any mistakes in your information which We hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to Our continued processing of your personal data
- otherwise restrict Our processing of your personal data in certain circumstances
- claim compensation for damages caused by Our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the **[Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#)**.

If you would like to exercise any of those rights, please:

- Contact Us using Our Contact details below,
- Let Us have enough information to identify you. It is normally enough proof of identity if you send the request from the same email address used for past communications,

- We will let you know if we need additional information to verify your identity,
- We will let you know if we need additional information to verify your identity,
- Let Us know the information to which your request relates.

## How to complain

We hope that We can resolve any query or concern you raise about Our use of your information. The GDPR and the UK GDPR also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

**You have the right to make a complaint at any time to the applicable data protection supervisory authorities in the EU/UK/EEA/Switzerland. You can find the list of the EU data protection authorities [here](#).**

## Contact

All questions, comments and requests regarding this Privacy Notice should be addressed to [legal@zoovu.com](mailto:legal@zoovu.com). You may also contact our Data Protection Officer. Our DPO contact details can be found below:

Aphaia Ltd  
The Brew  
Eagle House  
163 City Rd  
London EC1V 1NR

Contact email: [dpo@aphaia.co.uk](mailto:dpo@aphaia.co.uk)

Contact telephone: (+44) (0)20 3917 4158