

**PRIVACY NOTICE**

*Effective Date: 24 July 2020*

**ABOUT US**

**THE PURPOSE OF THIS PRIVACY NOTICE**

**WHO THIS NOTICE APPLIES TO**

**OUR PROCESSING ACTIVITIES**

**THE PERSONAL DATA WE COLLECT**

**SOURCES OF PERSONAL DATA**

**HOW WE USE PERSONAL DATA**

**DISCLOSURE**

**SECURITY MEASURES**

**TRANSFERS OUTSIDE THE EEA**

**COOKIES**

**THIRD PARTY WEBSITES**

**ACCESS TO INFORMATION**

**RETENTION**

**AMENDMENTS TO THIS PRIVACY NOTICE**

**HOW TO CONTACT US**

**SUPERVISORY AUTHORITY**

**ABOUT US**

*Terms used to refer to the Company include “we”, “us” and “our”*

**Company:** Social Talent Limited  
**Address:** One Kilmainham Square, Dublin 8, Ireland  
**Registered Number:** 491073  
**Website:** <http://socialtalent.com>

**THE PURPOSE OF THIS PRIVACY NOTICE**

*We provide internal recruitment teams and hiring managers with the skills and knowledge to source, assess, interview and hire with greater efficiency.*

This Privacy Notice (together with our User Agreement, where relevant, available at <https://www.socialtalent.com/terms-and-conditions> (the “**End User Agreement**”) sets out the basis on which any personal data we collect from you, or that you provide to us, will be used by us where we are controllers of that personal data for the purposes of the General Data Protection Regulation in Europe (the “**GDPR**”). If you are an employee of one of our customers, then we are only the processor of your personal data (your employer is the controller), but we provide this Privacy Notice to you on behalf of your employer. Please read this Privacy Notice carefully to understand our views and practices regarding the personal data we collect and how we will treat it.

*This Privacy Notice covers how we process personal data for the purposes of the GDPR.*

This Privacy Notice is a statement of our commitment to protect the rights and privacy of individuals in accordance with data protection legislation including where applicable the GDPR.

Social Talent provides a learning management system (the “**Platform**”) and related services to enable recruitment teams to source the right talent.

**WHO THIS NOTICE APPLIES TO**

This Privacy Notice provides specific information relating to the following data subjects where we act as controllers of their personal data for the purposes of the GDPR:

- (i) individual consumers who contract with us directly for use of and access to the Platform;
- (ii) users on our graduate list available at <https://ninja.socialtalent.co/>;
- (iii) business contacts including Customers and suppliers whose personal details we process on our customer relationship management system and for the purposes of processing payments;
- (iv) users of our Website;
- (v) individuals who we communicate with to work with our company.

If you are an employee of one of our corporate customers (referred to here as the “Customer”), then we provide this Privacy Notice to you on behalf of the Customer. When we provide access to the Platform and related services to end users like you who are authorised to access the Services by their employer, the Customer controls the purpose and the means of any use made by us of the personal data that is provided to us, and we are a processor for the purposes of the GDPR.

**OUR PROCESSING ACTIVITIES**

We have set out below the circumstances where we act as controllers of personal data.

*We will only ever process personal data in compliance with data protection legislation and in manner that the individual might reasonably expect.*

We use your personal data to provide you with certain services and to assist us in the operation of our business. Under data protection law, we must ensure that there is an appropriate basis for the processing of your personal data and let you know what that basis is.

*Generally we process your personal data on the basis that a) you have consented to the processing; b) the processing is necessary for the performance of our contracts with you or in order to take steps at your request before entering a contract; c) the processing is necessary in order for us to pursue our legitimate interests; and/or d) the*

We have set out below the legal basis for processing personal data for the purposes of the GDPR. At times we will need to process your data to pursue our legitimate business interests, for example for administrative purposes, to provide information to you, to operate, evaluate, maintain, develop and improve our websites and services or to maintain their security. We will not process your data on a legitimate interest basis where the impact of the processing on your interests and rights outweigh our legitimate interests.

If do not want us to process your personal data on the basis of our legitimate interests, contact us at [privacy@socialtalent.com](mailto:privacy@socialtalent.com) and we will reassess our processing activities.

Processing activity	Legal Basis
Processing data for users of the Platform (ie. name, e-mail, job title, learning progress)	Contract – End User Agreement (for individual customers) Legitimate Interest – (for employees of corporate customers)

processing is required by law.

We have set out clearly here what processing activities we undertake and what are legal basis is for processing that data.

Registration for free use of SourceHub available at <a href="http://www.sourcehub.co">www.sourcehub.co</a> on an individual basis	Contract – End User Agreement
Appearance on our graduate list available at <a href="https://ninja.socialtalent.co/">https://ninja.socialtalent.co/</a>	Legitimate Interest
Sending newsletters and other information that may be of interest to you	Consent/Legitimate Interest
Use of the Website as an unregistered visitor	Legitimate Interest
Candidates for job opportunities with the Company	Legitimate Interest/Consent
Business contact information for the purposes of account management	Contract – Subscription Agreement
Business contact information for the purposes of lead generation	Legitimate Interest
Event and webinar administration and management	Consent/Legitimate Interest

We may need to use your information to comply with legal and regulatory obligations, including complying with your information rights, with reporting obligations and with court orders. We may also need to process your personal data to protect your vital interests or those of another person.

## **THE PERSONAL DATA WE COLLECT**

We collect limited personal data in order to perform the processing activities. We have described here what personal data we collect.

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, payment details and information about your interaction with the services provided by us.

### **We collect identity data**

We collect the following identity data: name, email address, phone number, country, company and department.

### **We collect payment data**

We will need to collect your payment details to take payment from you for the services provided by us.

### **We collect data from your interactions with us and our business relationship**

If you interact with us we will record details of those interactions. For example, we will collect details of phone calls, email correspondence and hard copy correspondence.

### **We will collect your identity data as part of sales and lead generation activities**

### **We collect recruitment related data**

If we interact with you for the purposes of any job with Social Talent we will collect recruitment related data such as identity data, CV data and application data as part of the recruitment process. We may collect diversity data such as gender, religion, ethnic origin, sexual orientation but only with your consent.

### **We collect certain non-personal technical data from your interactions with our website**

When you interact with us online we will automatically collect data about your use of our services, including data on the type of device you're using, its IP address, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. This information is collected at an aggregate level and your identity data is not stored as part of this technical data.

For further information see our [cookies policies](#) below.

### **SOURCES OF PERSONAL DATA**

*Generally we collect personal data that has been provided directly by you and from sources where you would reasonably expect us to collect it from.*

We will collect personal data from you when you interact with us, for example if you register for an event, request information or support, use our services (including our websites) or purchase our products.

We may collect personal data about you indirectly, for example from your company or from your professional social media accounts in order to contact you about our products and services.

In addition our servers, logs and other technologies automatically collect certain information to help us administer, protect and improve our services, analyse usage and improve user experiences.

### **HOW WE USE PERSONAL DATA**

*We will only ever use personal data for the purposes set out in this privacy notice.*

We will only use personal data for the purpose of [our processing activities](#) mentioned including to:

- manage and administer your subscription for products and services that we provide to you
- process your applications for participation in events that we run, including conferences, seminars, workshops and training
- process payments that are paid by you
- contact you by post, phone, text message, email, social media, or fax using our online website or other means
- assess your suitability for any role that we have available
- monitor and record our conversations when we speak to you on the telephone (for example, to check your instructions to us, to analyse, to assess and improve customer service and for training and quality purposes)
- manage and respond to a complaint or appeal
- keep proper records
- send communications that may be of interest to you. You can unsubscribe from receiving such communications by contacting us using [the details below](#) or following the unsubscribe process;
- send notifications about changes to our products and services;

- ensure that content from the Website is presented in the most effective manner;
- administer the Website and for internal operations, including support, troubleshooting, data analysis, testing, research, statistical and survey purposes;
- provide information to users;
- contact you about our products and services;
- improve the Website and our products and services and to ensure that content is presented in the most effective manner for you and for your device;
- allow you to participate in interactive features when you choose to do so; and
- as part of our efforts to keep our services safe and secure.

## DISCLOSURE

In certain circumstances, we may disclose personal data to third parties as follows:

*We share your information with a number of organisations for the purpose of providing our products and services to you. We may also share your personal data where this is necessary because of legal or regulatory requirements.*

- business partners and sub-contractors for the performance of any contract including, payment processors, data aggregators and hosting service providers;
- our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes;
- we may disclose the information relevant to any backup or hosting services to Amazon. You can read more about the measures taken by Amazon to protect the security of their services and the information at: <https://aws.amazon.com/compliance/data-privacy-faq/>;
- analytics and search engine providers that assist us in the improvement and optimisation of the Website. This consists of aggregated anonymous information only and relates to the web pages visited on the Website and not the information included on those webpages;
- if we or substantially all of our assets are acquired by a third party, in which case personal data held by us will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the End User Agreement and other agreements;
- to protect our rights, property, or safety, or that of yours or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection;
- as required by law, in order to respond to a court order or request from law enforcement or other public authority and in order to meet national security or law enforcement requirements. We will disclose your personal data if this is necessary to:
  - comply with a legal obligation
  - protect or defend our rights, interests or property or that of a third party

- prevent or investigate possible wrongdoing in connection with our services
- act in urgent circumstances to protect the personal safety of one or more individuals
- protect against legal liability.

When we engage another organisation to perform services for us, we may provide them with information including personal data, in connection with their performance of those functions. We do not allow third parties to use personal data except for the purpose of providing these services.

## **SECURITY MEASURES**

*We are committed to protecting the security of your personal information and have implemented appropriate physical, technical and administrative safeguards.*

We will take all steps reasonably necessary to ensure that personal data is treated securely in accordance with this Privacy Notice and the relevant law.

In particular, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we manage and collect.

To protect the privacy and security of the personal data, we will also take reasonable steps to verify your identity before granting access to information as appropriate.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We also use secure connections to protect personal data during its transmission. Where you have been given (or where you have chosen) a password which enables you to access the services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## **TRANSFERS OUTSIDE THE EEA**

*We do not currently transfer personal data outside the EEA.*

We do not currently transfer personal data outside the European Economic Area (“EEA”). If at any time it becomes necessary for us to transfer personal data outside the EEA, it will only be transferred outside the area using legally approved transfer mechanisms such as the Standard Contractual Clauses.

## **COOKIES**

*Cookies help us improve the products and services that we offer you.*

The Website uses cookies to distinguish you from other users of the Website. This helps us to provide you with a good experience when you browse the Website and also allows us to improve the Website. If you register with us or if continue to use the Website, you agree to our use of cookies. Please go to the cookie management tool available on the Website at <https://www.socialtalent.com/> to understand the cookies that we collect and manage your preferences around them.

*Cookies are optional and you do not have to accept them*

Cookies enable us to store information about your preferences and therefore customise the Website according to your individual interests. They are also used to monitor which parts of the Website are the most popular to its visitors. Please be aware that if you do disable cookies however, certain services on the Website will not be available to you and your use and enjoyment of them will be impaired.

### **THIRD PARTY WEBSITES**

Our Website and the Platform may contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy notices. We do not accept any responsibility or liability for these third party websites nor do we provide support for their services. Please undertake the appropriate due diligence before submitting any personal data to these websites.

### **ACCESS TO INFORMATION**

*If you are resident in the EEA, you have a number of rights to control the personal data we use and how we use it. This includes the right to access your personal data, rectify inaccuracies, request that your data be deleted, restrict and/or object to the processing of your data and transfer your personal data to other entities. You may exercise these rights by contacting us via email at [privacy@socialtalent.com](mailto:privacy@socialtalent.com), or by sending a letter to the following address: One Kilmainham Square, Dublin 8, Ireland.*

If you are resident in the EEA, you have several rights under the GDPR:

#### **You can ask for access to the information we hold on you**

You have the right to ask for all the information we have about you and the services you receive from us. When we receive a request from you in writing, we must give you access to everything we've recorded about you as well as details of the processing, the categories of personal data concerned and the recipients of the personal data.

We will provide the first copy of your personal data free of charge but we may charge you a reasonable fee for any additional copies.

We cannot give you access to a copy of your data if this would adversely affect the rights and freedoms of others.

#### **You can ask to change information you think is inaccurate**

You should let us know if you disagree with something included in your personal data.

We may not always be able to change or remove that information but we'll correct factual inaccuracies and may include your comments in the record to show that you disagree with it.

#### **You can ask to delete information (right to be forgotten)**

In some circumstances you can ask for your personal information to be deleted, for example, where:

- your personal information is no longer needed for the reason that it was collected in the first place
- you have removed your consent for us to use your information (where there is no other legal reason us to use it)
- there is no legal reason for the use of your information
- deleting the information is a legal requirement

Where your personal information has been shared with others, we will do what we can to make sure those using your personal information comply with your request for erasure.

Please note that we can't delete your information where:

- we are required to have it by law

- it is used for freedom of expression
- it is used for public health purposes
- it is for scientific or historical research or statistical purposes where deleting the data would make it difficult or impossible to achieve the objectives of the processing
- it is necessary for legal claims.

**You can ask us to limit what we use your personal data for**

You have the right to ask us to restrict what we use your personal data for where:

- you have identified inaccurate information, and have told us of it
- where we have no legal reason to use that information but you want us to restrict what we use it for rather than erase the information altogether

When personal data is restricted it can't be used other than to securely store the data and with your consent to handle legal claims and protect others, or where it's for important public interests.

**You can ask to have your personal data moved to another provider (data portability)**

You have the right to ask for your personal information to be given back to you or another service provider of your choice in a commonly used format. This is called data portability.

This right only applies if we're using your personal information with consent and if decisions were made by a computer and not a human being. It does not apply where it would adversely affect the rights and freedoms of others.

**You can make a complaint**

You have the right to lodge a complaint with the local supervisory authority for data protection in the EU member state where you usually reside, where you work or where you think an infringement of data protection law took place.

**RETENTION**

*We only keep your data as long as it is necessary for the purposes of processing it or to comply with legal or regulatory requirements.*

In some circumstances it is not possible for us to specify in advance the period for which we will retain your personal data. In such cases we will determine the appropriate retention period based on balancing your rights against our legitimate business interests. We may also retain certain personal data beyond the periods specified herein in some circumstances such as where required for the purposes of a legal claims.

Our retention policy is as follows:

<b>Processing activity</b>	<b>Retention Period</b>
Processing data for users of the Platform (ie. name, e-mail, job title, learning progress)	For the duration of the End User Agreement / Subscription Agreement + 30 days afterward.
Registration for free use of SourceHub on an individual basis	For the duration of the contract or period of inactivity of two (2) years



Appearance on our graduate list available at <a href="https://ninja.socialtalent.co/">https://ninja.socialtalent.co/</a>	Until you unsubscribe or if you don't unsubscribe, after a period of five (5) years
Sending newsletters and other information that may be of interest to you	Until you unsubscribe
Use of the Website as an unregistered visitor	12 months
Candidates for job opportunities with the Company	12 months
Business contact information for the purposes of account management	For the duration of the contract and as required for audit purposes thereafter
Business contact information for the purposes of lead generation	Until you unsubscribe or if you don't and no business relationship arises then two (2) years from the date of collection
Event and webinar administration and management	Until you unsubscribe

In certain cases we may retain information for longer than specified here if required under relevant laws.

### AMENDMENTS TO THIS PRIVACY NOTICE

*We may change this privacy statement from time to time*

We will post any changes on the Website and when doing so will change the updated date at the top of this Privacy Notice. Please make sure to check the date when you use our services to see if there have been any changes since you last used those services. If you are not happy with any changes that we have made you should cease using our services.

In some cases we may provide you with additional notice of changes to this Privacy Notice, such as via email. We will always provide you with such additional notice well in advance of the changes taking effect where we consider the changes to be material.

### HOW TO CONTACT US

Please contact us if you have any questions about this Privacy Notice or information we hold about you:

- by email at: [privacy@socialtalent.com](mailto:privacy@socialtalent.com)
- or write to us at: One Kilmainham Square, Dublin 8, Ireland

If you are an employee of one of our Customers, please contact your employer directly.

### SUPERVISORY AUTHORITY

The Data Protection Commission in Ireland may be contacted through their website at <https://forms.dataprotection.ie/contact> if you have any concerns or questions about the processing of your personal data.