

Privacy Policy

Version 1.2



Last Updated: 26th April 2018



© greatwithtalent Ltd 2018

great{with}talent is a trademark of greatwithtalent Ltd which is registered in the
United Kingdom and other countries.

www.greatwithtalent.com ▫ info@greatwithtalent.com ▫ +44 (0) 333 012 4649

Introduction.

great{with}talent cares deeply about your privacy. For this reason, we collect and use personal data only as it might be needed for us to deliver to you (the “Client”) our world-class products, services, websites and mobile applications (including Free Trials), collectively, our “Services”.

Our Privacy Policy is intended to describe to you how and what data we collect, and how and why we use your personal data. It also describes options we provide for you to access, update or otherwise take control of your personal data that we process.

If at any time you have questions about our practices or any of your rights described below, you may reach our Data Protection Officer (“DPO”) at dpo@greatwithtalent.com.

Important Legal Notices

*FOR THE PURPOSES OF THE SERVICES PROVIDED BY GREAT{WITH}TALENT TO THE CLIENT, WE ARE CATEGORISED AS THE **DATA PROCESSOR** FOR THE INFORMATION WE GATHER AS PART OF OUR ONLINE QUESTIONNAIRES AND ASSESSMENTS, AND HAS NO DIRECT RELATIONSHIP WITH THE INDIVIDUAL(S) WHOSE PERSONAL DATA IT PROCESSES UNDER DIRECTION OF THE CLIENT.*

*IF YOU ARE A POTENTIAL OR CURRENT EMPLOYEE (“INDIVIDUAL”) OF A CLIENT, THE **DATA CONTROLLER**, THAT USES GREATWITHTALENT SERVICES, THIS PRIVACY POLICY DOES NOT APPLY TO YOU OR YOUR USE OF THE SERVICES. PLEASE REFER TO THE CLIENT’S PRIVACY POLICY, WHICH APPLIES TO THE COLLECTION, USE, PROCESSING AND RETENTION OF YOUR PERSONAL INFORMATION.*

GREATWITHTALENT TAKES INDIVIDUAL PRIVACY VERY SERIOUSLY AND THIS [PRIVACY NOTICE](#) SHOULD BE READ BEFORE QUESTIONNAIRE COMPLETION.

Accepting this Privacy Policy.

We need to process your personal information to run our business and provide you with the Services. By accepting our [Terms of Service](#) (which includes specific information for Clients governed under the General Data Protection Regulation (GDPR)), you are confirming that you have read and understand this policy including how and why we use your information. If you don’t want us to collect or process your personal information in the ways described in this policy, you shouldn’t use the Services. We are not responsible for the content or the privacy policies of third-party websites, or third-party apps.

What information do we collect?

We collect information so that we can provide the best possible experience when you utilise our Services. Much of what you likely consider personal data is collected directly from you when you:

- (1) create an account or purchase any of our Services;
- (2) request assistance from our customer support team;
- (3) complete contact forms or request other information from us.

Your personal data includes information such as:

- Name
- Employer's Address
- Contact numbers
- Email addresses
- Other data collected that could directly or indirectly identify you.

However, we also collect additional information when delivering our Services to you to ensure necessary and optimal performance. These methods of collection may not be as obvious to you, so we wanted to highlight and explain below a bit more about what these might be (as they vary from time to time) and how they work:

Account related information is collected in association with your use of our Services, such as account number, purchases, when Services renew or expire, information requests, and customer service requests and notes or details explaining what you asked for and how we responded.

Cookies and similar technologies on our websites and our mobile applications allow us to track your browsing behaviour, links clicked, units purchased, your device type, and to collect various data, including analytics, about how you use and interact with our Services. This allows us to provide you with more relevant product offerings, a better experience on our sites and mobile applications, and to collect, analyse and improve the performance of our Services. We may also collect your location (IP address) so that we can personalise our Services. For additional information, and to learn how to manage the technologies we utilise, please visit our [Cookie Policy](#).

Data about usage of services is automatically collected when you use and interact with our Services, including metadata, log files, cookie/device IDs and location information. This information may include specific data about your interactions with the features, content and links (including those of third-parties, such as social media plugins) contained within the Services, Internet Protocol (IP) address, browser type and settings, the date and time the Services were used, information about browser configuration and plugins, language preferences and cookie data, information about devices accessing the Services, including type of device, what operating

system is used, device settings, application IDs, unique device identifiers and error data, and some of this data collected might be capable of and be used to approximate your location.

How we utilise information.

We strongly believe in both minimising the data we collect and limiting its use and purpose to only that (1) *for which we have been given permission*, (2) *as necessary to deliver the Services you purchase or interact with*, or (3) *as we might be required or permitted for legal compliance or other lawful purposes*. These uses include:

Delivering, improving, updating and enhancing the Services we provide to you. We collect various information relating to your purchase, use and/or interactions with our Services. We utilise this information to:

- Improve and optimise the operation and performance of our Services (again, including our websites and mobile applications)
- Diagnose problems with and identify any security risks, errors, or needed enhancements to the Services
- Detect and prevent fraud and abuse of our Services and systems
- Collecting aggregate statistics about use of the Services
- Understand and analyse how you use our Services and what products and services are most relevant to you.

Often, much of the data collected is aggregated or statistical data about how individuals use our Services, and is not linked to any personal data, but to the extent it is itself personal data, or is linked or linkable to personal data, we treat it accordingly.

Sharing with trusted third parties. We may share your personal data with affiliated companies within our corporate family, with third parties with which we have partnered to allow you to integrate their services into our own Services, and with trusted third party service providers as necessary for them to perform services on our behalf, such as:

- Processing credit card payments
- Performing analysis of our Services and customers demographics
- Communicating with you, such as by email or survey delivery
- Customer relationship management.

We only share your personal data as necessary for any third party to provide the services as requested or as needed on our behalf. These third parties (and any subcontractors) are subject to strict data processing terms and conditions and are prohibited from utilising, sharing or retaining your personal data for any other purpose than as they have been specifically contracted for (or without your consent).

Communicating with you. We may contact you directly or through a third party service provider regarding products or services you have signed up or purchased from us, such as necessary to deliver transactional or service related communications. We may also contact you with offers for additional services we think you'll find valuable if you give us consent, or where allowed based upon legitimate interests. You don't need to provide consent as a condition to purchase our goods or services. These contacts may include:

- Email
- Text (SMS) messages
- Telephone calls

You may also update your subscription preferences with respect to receiving communications from us at any time.

Compliance with legal, regulatory and law enforcement requests. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process to protect our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent or stop activity we consider to be illegal or unethical.

To the extent we are legally permitted to do so, we will take reasonable steps to notify you in the event that we are required to provide your personal information to third parties as part of legal process.

Website analytics. We use multiple web analytics tools provided by service partners such as Google Analytics, Pingdom and AddThis to collect information about how you interact with our website or mobile applications, including what pages you visit, what site you visited prior to visiting our website, how much time you spend on each page, what operating system and web browser you use and network and IP information. We use the information provided by these tools to improve our Services. These tools place persistent cookies in your browser to identify you as a unique user the next time you visit our website. Each cookie cannot be used by anyone other than the service provider (ex: Google for Google Analytics). The information collected from the cookie may be transmitted to and stored by these service partners on servers in a country other than the country in which you reside. Though information collected does not include personal data such as name, address, billing information, etc., the information collected is used and shared by these service providers in accordance with their individual privacy policies. You can control the technologies we use by managing your settings through our [Cookie Policy](#) or the 'cookie banners' that may be presented (depending on URL of website visited) when you first visit our webpages, or by utilising settings in your browser or third-party tools, such as [Disconnect](#), [Ghostery](#) and others.

Third-party websites. Our website and our mobile applications contain links to third-party websites. We are not responsible for the privacy practices or the content of third-party sites. Please read the privacy policy of any website you visit.

How you can access, update or delete your data.

To easily access, view, update, delete or port your personal data (where available), or to update your preferences, please sign into your User Account and visit “User & Account Settings.”

If you make a request to delete your personal data and that data is necessary for the products or services you have purchased, the request will be honoured only to the extent it is no longer necessary for any Services purchased or required for our legitimate business purposes or legal or contractual record keeping requirements.

How we secure, store and retain your data.

We follow generally accepted standards to store and protect the personal data we collect, both during transmission and once received and stored, including utilisation of encryption where appropriate.

We retain personal data only for as long as necessary to provide the Services you have requested and thereafter for a variety of legitimate legal or business purposes. These might include retention periods:

- mandated by law, contract or similar obligations applicable to our business operations;
- for preserving, resolving, defending or enforcing our legal/contractual rights; or
- needed to maintain adequate and accurate business and financial records.

If you have any questions about the security or retention of your personal data, you can contact us at dpo@greatwithtalent.com.

‘Do Not Track’ notifications.

Some browsers allow you to automatically notify websites you visit not to track you using a “Do Not Track” signal. There is no consensus among industry participants as to what “Do Not Track” means in this context. Like many websites and online services, we currently do not alter our practices when we receive a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track,” you may wish to visit www.allaboutdnt.com.

Changes in our Privacy Policy.

We reserve the right to modify this Privacy Policy at any time. If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy and any other places we deem appropriate, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If we make material changes to this Privacy Policy, we will notify you here.

Data Protection Authority.

If you are a Client in the European Economic Area (EEA) then we maintain your personal data subject to the General Data Protection Regulation (GDPR), effective 25th May 2018. Your data is never transferred outside of the EEA.

great{with}talent are registered under the UK Data Protection Act 1998, registration number Z8456243.

Contact us.

If you have any questions, about this privacy Policy, our practices or our Services, you may contact our DPO by email dpo@greatwithtalent.com or at:

GreatWithTalent Ltd
81-83 Victoria Road
Surbiton
Surrey, KT6 4NS
United Kingdom

Company Registration No: 04700857

We will respond to all requests within thirty (30) days.