



Privacy and Data Protection Policy

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1. Overview

- 1.1. This policy details the responsibilities of Gravyty's employees and sub-contractors to protect any and all personal data (of whatever origin and type) that they are exposed to, or handle, and respect the privacy of any and all data subjects.

2. Purpose

- 2.1. This policy's purpose is to provide a detail of the legal requirements, internal procedures and guidelines for acceptable collection, handling and processing of personal data, as determined by applicable law, Gravyty's management, regulators, customers and users.

3. Scope

- 3.1. This Privacy and Data Protection Policy ("**Policy**") covers all Gravyty employees and sub-contractors ("**Gravyty Personnel**") that are exposed to, or handle, any and all personal data ("**Data**") whether or not that personal data is of a particularly sensitive nature. By complying with this Policy, Gravyty Personnel shall respect and protect the personal data and privacy of any and all data subjects.

4. General

- 4.1. Privacy and confidentiality are at the heart of Gravyty's business.
- 4.2. We treat personal data and information seriously, respect individuals' privacy and understand the importance of maintaining the confidentiality of information stored about our peers, customer and users ("**Data Subjects**") while doing business with Gravyty or whilst using Gravyty services.
- 4.3. Gravyty's entire market reputation depends on treating personal information properly, in the strictest confidence and with due sensitivity.
- 4.4. All Data must be handled at all times with the utmost care, in accordance with this Policy.
- 4.5. All Data Subject rights must be respected at all times with the utmost sensitivity, in accordance with this Policy.



- 4.6. Responsibility for this Policy, exceptions, and handling unusual cases, lies with Gravyty's Data Protection Officer.

5. Legal Requirements

- 5.1. Headhunter Systems Limited ("Gravyty") is fully compliant with UK data protection legislation, the Data Protection Act of 2018 (DPA 2018), and effective May 25, 2018, the EU General Data Protection Regulation (Regulation (EU) 2016/679) or GDPR.
- 5.2. Furthermore, Headhunter Systems Limited is registered as a Data Controller with the UK regulatory body, the Information Commissioner's Office (ICO). Our registration number is Z2240223. Our entry on the ICO Register can be found here:
<https://ico.org.uk/ESDWebPages/Entry/Z2240223>
- 5.3. Gravyty follows the ICO Guides and Codes of Practice on data handling, protection and the sharing of data with others. Our Service Agreements, Privacy Policy and Terms of Use (as available on the Gravyty platform) reflect this guidance.
- 5.4. Gravyty remains subject to GDPR irrespective of UK's intended departure from the European Union in 2019.
- 5.5. All exceptions and breaches of this policy must be reported immediately to the Data Protection Officer.

6. Compliance with Data Protection Laws

- 6.1. Gravyty Personnel shall comply with the requirements of applicable data protection laws, privacy laws and this Policy in respect of their day-to-day activities when collecting or processing Data.
- 6.2. Gravyty Personnel shall not knowingly do anything or permit anything to be done which might lead to a breach of such data protection laws.
- 6.3. Gravyty personnel may only process Data to the extent it relates to:
 - (a) the types of Data;



- (b) the categories of Data Subject;
- (c) the nature and purpose; and
- (d) lawful purpose

to provide Gravyty customers and users with Gravyty services or to provide information about Gravyty's products or services.

- 6.4. Gravyty Personnel may not allow Data to be processed by, or transferred to, any other person or organization (including processors, sub-contractors or sub-processors) under any circumstances except for with the express written approval of the Data Protection Officer (who will ensure that any transfer is done for an approved purpose and using a method sanctioned by the relevant data protection law.)
 - 6.5. Gravyty Personnel may not share, show or display (even momentarily) any Data of one customer or user to any other customer or user without appropriate consents to do so being obtained.
 - 6.6. Gravyty Personnel shall fully comply with all supervisory audits made by any regulatory authority.
 - 6.7. In a case where Gravyty acts as data processor, pursuant to data processor agreement, Gravyty personnel must, inter alia:
 - (a) process the Data only in accordance with the written instructions provided;
 - (b) maintain all appropriate technical and organisational security measures against:
 - (i) unauthorised or unlawful processing, use, access to or theft of the Data; and
 - (ii) loss or destruction of or damage to the Data,
- to ensure that the relevant data controller continues to act in accordance with the requirements of applicable data protection laws and protects the rights of the Data Subjects.



7. Sensitive or Special Types of Data

7.1 Gravyty or Gravyty Personnel may not, under any circumstances, collect, process or store any sensitive or especially sensitive personal information such as credit card or banking data, social security, passport or driving license numbers, mother's maiden name, medical information, racial or ethnic origin, sexual orientation, political opinions or associations, criminal history or religious affiliation and beliefs.

8. Access to Data

- 8.1. Access to Data is limited to Gravyty Personnel --
 - (a) who require access to the Data to meet Gravyty's obligations to its customers and users; and
 - (b) as is strictly necessary for performance of their duties.
- 8.2. Access to Data is restricted for all other Gravyty Personnel.
- 8.3. Should Gravyty Personnel become aware that other individuals not so authorised have access to Data, the Data Protection Officer must be informed immediately.
- 8.4. Gravyty's Acceptable Use Policy shall also apply to customer or user Data.
- 8.5. Gravyty Personnel understand that use of Data and systems to engage in any activity not related to Gravyty's business or for other purpose except for that for a lawful purpose is an offense under law and a disciplinary offence which will result in termination for cause.

9. Technical and Organizational Measures

- 9.1. Gravyty's technical and organization measures for protecting Data and privacy are set out in this Policy and its other Information Security policies.
- 9.2. Gravyty's corporate website privacy policy can be found here: <https://gravyty.com/privacy-policy/>
- 9.3. The Gravyty alumni community and mentoring platform privacy policy can be found on each Gravyty alumni community and mentoring platform.



- 9.4. Gravyty's alumni community and mentoring platform has been built under "privacy by design" principles, collecting and processing Data in accordance with data protection laws and practice.

10. Data Subject Requests

- 10.1. DPA 2018 and GDPR provide Data Subjects with rights with regards the processing of their data. These include:
- the right to be informed;
 - the right of access;
 - the right to rectification;
 - the right to erasure;
 - the right to restrict processing;
 - the right to data portability; and
 - the right to object to processing.
- 10.2. To the extent that Data Subject Requests are received by Gravyty Personnel, Gravyty Personnel shall comply with the request as soon as is possible, but no later than within five (5) working days. Gravyty Personnel shall update the relevant Gravyty customer that a Data Subject Request has been received together with its nature such that any Gravyty customer can similarly comply.


11. Records

- 11.1. Gravyty Personnel shall maintain records of all Data processing activities including the different types of processing being carried out (if applicable).
- 11.2. The length of time that we retain, and store Data depends on the purpose for which it was collected. We will only store Data for as long as is required to fulfil that purpose, or for the purpose of satisfying legal requirements.

12. Data Breaches

- 12.1. Gravyty Personnel must be aware of any cases (whether suspected or actual) where there is (or may be) unauthorised or unlawful processing, use of, or access to the Data, or any theft of, loss of, damage to or destruction of the Data ("**Data Breach**").



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- 12.2. Any actual, possible or probable Data Breach shall be reported immediately to the IT Management Group and the Data Protection Officer who will determine the appropriate course of action pursuant to the Incident Management Policy and applicable law.
 - 12.3. Gravyty Personnel shall provide Gravyty customers and users with full co-operation and assistance in dealing with the Data Breach, in particular in relation to:
 - (a) resolving any data privacy or information security issues involving any Data; and
 - (b) making any appropriate notifications to individuals affected by the Security Incident or to a regulatory authority.
 - 12.4. The Data Protection Officer shall investigate any Data Breach in the most expedient time possible and provide affected Gravyty customers and/or users with a detailed description of the Data Breach to include, the type of data that was the subject of the Data Breach, its remedy, and any other information that affected Gravyty customers and/or users may request concerning the Data Breach .

13. Return or Destruction of Data

- 13.1. Gravyty and Gravyty Personnel shall, upon a lawful request, destroy or return all Data and copies the Data, unless the Data Protection Officer determines that relevant data protection or other local applicable law to which Gravyty is subject requires that Data to be retained.

14. Policy Guidance and Questions

- 14.1 Any further guidance and queries in relation to this Policy (included permitted exceptions) shall be addressed to the Data Protection Officer.

