

Privacy Policy

PredictiveHire Limited (Company number 09342431)

This Privacy Policy applies to PredictiveHire Limited, a company registered in England and Wales with its registered office at Hermes House, Fire Fly Avenue, Swindon, SN2 2GA, United Kingdom, PredictiveHire Pty Ltd (ACN 164 492 586) of Level 16, 530 Little Collins Street, Melbourne 3000, Australia, and their respective affiliates (together "**we**", "**us**", "**our**"), in relation to their operations and explains how we handle personal information and comply with the requirements of applicable data protection and privacy laws ("**Privacy Laws**"). If you have further questions relating to this policy, please contact Predictive Hire direct on the contact details set out in section 16 below.

We recognise the importance of your privacy, and that you have a right to control how your personal information is collected and used.

1. Types of personal information we collect

- 1.1 We collect personal information from customers (existing and prospective), employees (existing and prospective) of customers, suppliers, contractors, shareholders, and other individuals for various business and other purposes further listed in section 3.2 below. In this section, we explain the types of personal information which we usually collect as well as how we collect this information.
- 1.2 The types of personal information Predictive Hire will collect from you will depend on the circumstances in which that information is collected. It may include:
 - (a) contact details (eg, your name, address, email and phone details);
 - (b) information required for you to transact with us (eg, place of work, position, authority to transact with us, etc.);
 - (c) information about your current and former employment (eg, place of work, position, length of tenure, qualifications, curriculum vitae, aptitude, performance reviews, psychological and medical testing results and any other relevant human resources information);
 - (d) information required for you to open a trading account with us or otherwise do business with us including bank account details, information obtained through credit checks and any other relevant financial information;
 - (e) information on prior dealings with Predictive Hire or our customers;
 - (f) age;
 - (g) information on personal lifestyle preferences;
 - (h) any other information required as part of a recruitment process; and
 - (i) statistical information regarding the use of the Predictive Hire websites, including website users' IP addresses and the dates, times and page locations of website users' visits.
- 1.3 The types of personal information listed in section 1.2 above are not intended as an exhaustive list. We may occasionally collect additional personal information about you as part of a user authentication process and may also require you to provide personal information about other individuals (eg, your authorised representatives etc). In that case, you are expected to inform any such individuals whose personal information you provide to us that you are providing

their personal information to us and to advise them about this policy. We accept no responsibility for advising any such individuals of the existence or content of this policy.

- 1.4 In order to provide services to our customers, we may sometimes need to collect sensitive information (including eg. information about a person's race, ethnic origin, political opinions, health, religious or philosophical beliefs, sexual preferences, genetics or criminal history). Where we do need to collect your sensitive information, we will only collect it with your consent, and we will only use it for the purpose for which you provided it.

2. How we collect personal information

- 2.1 In this section, we explain how we usually collect your personal information. We usually collect personal information through:

- (a) our websites;
- (b) software platforms through which we provide services to customers;
- (c) use of social media;
- (d) orders for products or services;
- (e) employment applications;
- (f) third party service providers;
- (g) requests for brochures, to join a mailing list or to be contacted for further information about our products or services;
- (h) provision of customer service and support;
- (i) responses to surveys or research conducted by us or on our behalf; and
- (j) publically available materials.

- 2.2 If you do not provide us with the information we request, we may not be able to fulfill the applicable purpose of collection, such as to supply products or services to you or to assess an application for employment.

- 2.3 Where practicable, we will collect personal information directly from you. From time to time we may be given information by third party sources, including but not limited to:

- (a) your employer;
- (b) your representatives or advisers;
- (c) our related entities and business partners; and
- (d) third parties who assist us in any aspect of our business.

- 2.4 We may also collect your personal information from other parties where legally required to do so. If we receive information about you from someone else, we will take reasonable steps to ensure you are aware that we have collected personal information about you and the circumstances of the collection.

- 2.5 While we take reasonable steps to ensure that your personal information remains secure, many information security risks do exist and we always recommend that you take appropriate steps to help safeguard your personal information from such risks.

3. How we use personal information

3.1 We will only use and disclose your personal information in accordance with Privacy Laws and this Privacy Policy. We will only process your personal information where:

- (a) you have consented to the processing (you can withdraw this consent at any time - see section 13.3 below); or
- (b) the processing is necessary for the purposes of our legitimate interests or those pursued by a third party (examples of legitimate interests include the pursuit of our commercial objectives, or where we process personal information for direct marketing purposes). However, we will not process your information for such purposes where these are overridden by your own interests or by your rights and freedoms with respect to your personal data.

3.2 The following table sets out the types of data we may collect in the course of providing services to our customers, the purpose for which that data is collected and processed, and the legal basis for processing that data:

We use personal data to	How do we use personal data for this purpose?	What is the legal basis for us processing your data in this way?
Verify your identity	We may use personal data to confirm your identity.	We need to be able to confirm your identity so that we can assess your expected performance against the KPIs for a particular role and assess your suitability for that role.
Supply products or services to our customers	<p>We use our own survey platform (Questionnaire eXperience, QX) to collect survey data from our customers' internal cohort of existing employees. External applicants applying for a job that matches the internal cohort description (e.g. Sales Assistant) will fill out the survey. A prediction is then calculated from an applicant's answers and sent to the customer. This is to give our customers insight into which applicants are best suited to a particular role.</p> <p>We may use data gathered from existing employees and applicants of one of our customers to generate insights for our other customers using big data analytics. However, we will only ever share your data with our other customers in an</p>	<p>We need to be able to process the survey data we collect from you in order to assess your suitability for roles you have applied for at our customer organisations, and provide insights to our customers to help them make the best hires.</p> <p>We will ask for your consent before processing your data in this way.</p>

	anonymised or de-identified form, from which it is not possible to identify you.	
Obtaining products and services from our suppliers	We need to process your data in the context of obtaining products and services from our suppliers which are necessary for us to provide our services, such as cloud-based solutions to enable us to store the data we collect.	We need to process personal data to obtain products and services from our suppliers where this is necessary for us to provide our services. We will ask for your consent before processing your data in this way.
Responding to reasonable enquiries from existing or prospective customers seeking information about our products or services	We may need to process personal data relating to current or potential employees of our existing or prospective customers, in order to respond to reasonable enquiries from those customers.	It is in our legitimate interests to process personal data where this is necessary for us to respond to the reasonable enquiries of our existing or prospective customers with regard to their current employees or applicants for roles at their organisations.
Processing and assessing employment applications	We process your personal data using data analytics techniques in order to assess your suitability for jobs you have applied for at our customers' organisations. We do this in order to match you to the most suitable positions and help our customers make better hiring decisions.	We need to process your data for the purposes of assessing your employment applications in order to provide services to our customers. We will ask for your consent before processing your data in this way.
Enforcing agreements between you and Predictive Hire	We may need to process your personal data for the purposes of enforcing agreements between you and us (such as the terms you agree to in order to complete our applicant surveys) in the event that you breach these agreements.	It is in our legitimate interests to process personal data where this is necessary for us to protect our own legal rights.
Undertaking research and surveys and analysing statistical information	We ask job applicants to complete surveys on behalf of our customers and collect applicants' personal information through these surveys. We use the information we collect to create a profile of the applicant and predict how that applicant would perform in a particular role.	We process the personal data we collect from surveys to assess an applicant's suitability for a particular role, and provide insights to our customers. We will ask for your consent to this type of data processing before processing your data in this way.
Keeping customers informed about our activities, products and services	We may use your personal information to provide you with relevant marketing	It is in our legitimate interest to provide you with marketing

	communications (including by text, email, post or online advertising), relating to our products and services. This includes measuring the effectiveness of our marketing communications campaigns, including online advertising.	communications, including online advertising, that are relevant to your interests. However, you can change your marketing choices, at any time. Please see the Direct marketing section below for information about how to change your marketing choices You also have choices when it comes to online advertising. Please see the section entitled "Cookies" below for more information about you can control your choices in relation to online advertising.
Improving our products and services and developing new products and services (whether or not we supply these to you)	We may use your personal data for the purpose of improving our data modelling capabilities. This includes identifying patterns within your data for the purposes of developing and improving our data science practices.	It is in our legitimate interest, given the nature of our business, to constantly improve in the area of data science so as to ensure that we remain technically relevant in this domain.
Complying with legal requirements	We may sometimes need to process personal data to comply with legal requirements (for example in relation to occupational health and safety and environmental matters).	It is in our legitimate interests to process personal data for the purposes of complying with legal requirements to which we are subject.

3.3 In order to provide services to our customers, we may use your personal data (including any data we collect through surveys or research) to predict your behaviour in a particular role and assess your suitability for that role. We do this by using data analytics to measure your expected performance against key performance indicators for that role and provide our customers with predictions of your performance. The purpose is to enable our customers to make better hiring choices.

4. When we disclose personal information

4.1 We generally explain at the time we collect personal information how we will use or disclose that information. We will only use or disclose personal information for a purpose other than for which it was collected or a related purpose if you have consented to such different use or disclosure or such use or disclosure is otherwise allowed by the Privacy Laws.

4.2 In carrying out our business, it may be necessary to share information about you with and between our related bodies corporate and organisations that provide services to us (eg, our

alliance partners). We would not otherwise routinely disclose personal information to another organisation unless:

- (a) required by law;
- (b) we believe it is necessary to provide you with a product or service which you have requested;
- (c) it is necessary to protect the rights, property or personal safety of any of our customers, any member of the public or our interests;
- (d) the assets and operations of our business are transferred to another party as a going concern; or
- (e) you have provided your consent.

5. Disclosure to Service providers

- 5.1 Like most large organisations, we may use a range of service providers to help us maximise the quality and efficiency of our services and our business operations. This means that individuals and organisations outside of Predictive Hire, such as our legal, financial, accounting, administrative and insurance service providers, will sometimes have access to personal information held by us and may use it on behalf of us. We require our service providers to adhere to strict privacy guidelines and not to keep this information or use it for any unauthorised purposes. If we do give our service providers access to any of your personal information, it will be de-identified.

6. Disclosure of information outside the jurisdiction of collection

- 6.1 We may disclose personal information outside of the jurisdiction from which it was collected. In the conduct of our business, we transfer to, and hold or access personal information from, various countries including Australia, the United Kingdom and the United States. The privacy laws of those countries may not provide the same level of protection as the privacy laws of the country from which the personal information was collected. However, this does not change our commitments to safeguard your privacy and we will comply with all applicable laws relating to the cross-border data disclosure.

7. Direct marketing

- 7.1 Like most businesses marketing is important to our business' success. We therefore, from time to time, send marketing materials to current or prospective customers. We only do so in accordance with applicable laws or with your prior consent.
- 7.2 If you are receiving promotional information from us and do not wish to receive this information any longer, you can opt out at any time by contacting Predictive Hire direct on the contact details set out in section 16 below and asking to be removed from our mailing lists, or by using the unsubscribe facilities included in our marketing communications.

8. Cookies

- 8.1 We sometimes use cookie technology on our websites to provide information and services to web site visitors. Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes and are a necessary part of facilitating online transactions. Most web browsers are set to accept cookies, but you can change your cookie preferences via your browser settings. Cookies are useful to estimate our number of members and determine overall traffic patterns through our websites. For more information about the cookies we use, please see our Cookie Policy on our website.

8.2 If you do not wish to receive any cookies, you may set your browser to refuse cookies. This may mean you will not be able to take full advantage of the services on the website.

9. Links to other websites

9.1 Our websites may contain links to third party websites. These linked sites are not under our control and we are not responsible for the content of those sites nor are those sites subject to our Privacy Policy. Before disclosing your personal information on any other website, we recommend that you examine the terms and conditions and Privacy Policy of the relevant site. Predictive Hire is not responsible for any practices on linked websites that might breach your privacy.

10. Employee information

10.1 This Privacy Policy does not apply to our handling of information about our own employees. For information about our practices relating to information about our employees, please contact us at the contact details listed in section 16 below.

11. Recruitment to work for Predictive Hire

11.1 If you send us an application to work for us, this information will be used to assess your application. This information may be disclosed to our other group companies and / or our third-party service providers for purposes such as:

- (a) aptitude, psychological and medical testing; and
- (b) other human resources management activities.

11.2 As part of the application process you may be asked for your specific consent to the use and disclosure of certain personal information about any pre-employment medical examination or any aptitude or psychological testing. We may also ask you to consent to the disclosure of your personal information to those people who you nominated to provide references.

11.3 A refusal to provide any of this information, or to consent to its proposed disclosure may affect the success of the application.

11.4 You may also be asked whether you agree to your personal information being provided to other companies in the Predictive Hire group for other positions relevant to your qualifications and experience.

12. Accessing and correcting the information we keep about you

12.1 You have a legal right to know what personal information we hold about you. You can request access to the information we hold about you by contacting us at the contact details listed in section 16 below. Our file of your information will usually be made available to you within 30 days, though the Privacy Laws may envisage certain circumstances in which we may not give you access to the personal information we hold about you (eg. where we cannot give, you access if it would unreasonably affect someone else's privacy or if giving you access poses a serious threat to someone's life, health or safety).

12.2 If at any time you wish to change the personal information we hold about you because it is inaccurate or out of date, please contact us at the contact details listed in section 16 below and we will amend your details. If you wish to have your personal information deleted, please let us know in the same manner and we will delete it unless we are required by law to keep it or need to keep it to protect our own legal rights.

- 12.3 [You have the right to ask us to provide you with the personal information we hold about you in a structured, commonly used and machine-readable format and, where technically feasible, to transmit that data to another organisation.]
- 12.4 There is generally no cost for accessing the personal information we hold about you. However, we may apply an administrative charge for providing access in certain circumstances. Any such charge will be reasonable and we will advise you of the charge and obtain your consent before providing you with access to your personal information.

13. Complaints

- 13.1 If you have a privacy-related complaint against us (including, for example, if you think that we have failed to comply with the Privacy Laws), you may use the contact details listed in section 16 below to notify us of your complaint. We will promptly acknowledge and address all complaints. In most cases, we will ask that you put your complaint in writing to us.
- 13.2 We will investigate any complaint and will use reasonable endeavours to respond to you in writing within 30 days of receiving a written complaint. You have the right to make a complaint to the relevant regulator responsible for data protection (being the Information Commissioner's Office in the UK and the Office of Australian Information Commissioner in Australia) if you are dissatisfied with the response that you receive from us or you believe that we have not complied with the Privacy Laws.
- 13.3 You have the right to withdraw any consent you have given to us processing your personal information at any time.
- 13.4 You also have the right to ask us to stop processing your data even where that processing is necessary for our legitimate interests (for example, where the processing is necessary for the commercial objectives we pursue in the course of our business), including the profiling we undertake to provide performance predictions to our customers.
- 13.5 In addition, you have the right to ask us to stop processing your data for direct marketing purposes, including any profiling we undertake for the purposes of direct marketing.
- 13.6 If you wish to make a complaint or ask us to stop processing your data as outlined in this clause, you can do this by contacting us using the contact details set out in section 16 below.

14. Storage and security of your personal information

- 14.1 We will take all reasonable steps to keep secure any information which we hold about you, and keep this information accurate, up to date and complete. Your information is stored on secure servers that are protected in controlled facilities. We require our employees and service providers to respect the confidentiality of any personal information held by us.

15. Retention of information

- 15.1 When we no longer need to use your information, we will remove it from our systems and records and / or take steps to properly anonymise or de-identify it so that you can no longer be identified from it.

16. Contacting Us

- 16.1 If you have any concerns or complaints about how we handle your personal information, or if you have any questions about this policy, please contact the PredictiveHire Support Team via support@predictivehire.com

17. Future changes

- 17.1 We operate in a dynamic business environment. Over time, aspects of our business may change as we respond to changing market conditions. This may require our policies to be reviewed and revised. We reserve the right to change this Privacy Policy at any time and notify you by posting an updated version of the policy on our website. If at any point we decide to use personal information in a manner materially different from that stated at the time it was collected we will notify users by email or via a prominent notice on our website, and where necessary we will seek the prior consent of our users.

November 2016