



Privacy, Data Protection & Cookies Policy

As the operators of the LANDED Hiring Software website, (**"the website"**) Onboard Staffing Solutions Ltd, registered in Northern Ireland with Company Registration Number NI620623 and having its address at 28 The Promenade, Portstewart, BT55 7AE (**"We"**, **"Us"**) is committed to protecting and respecting your privacy. This Policy (**"Policy"**) together with our Terms of Use and other documents referred to on it, set out the basis on which any Personal Data collected from you, or that you provide to us will be processed by us.

We aim at all times to process and collect your data lawfully, transparently, fairly and without adversely affecting your rights as a Data Subject (as defined below). Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

Please note:

By giving your consent, you are accepting and consenting to the practices describes in this policy. If you do not give your consent, please navigate away from the Website. You may withdraw your consent at any time. An explanation of your rights is set out below:

For the purpose of the Data Protection Act 1998 up to by not including 25th March 2018, and from then on, The General Data Protection Regulation ("GDPR");

- In respect of the personal data of users of the Website and the services, and business contacts and prospects of Workable, the Data Controller is Onboard Staffing Solutions Ltd. Our nominated representative, as Data Protection Officer for the purpose of Data Protection Legislation, is Michael Green, Finance Manager.
- In respect to Us processing personal information as a data controller, we also process personal information as a Data Processor on behalf of our customers, "the Employer", who use our Services to assist with their recruitment process. Where you are a Candidate or prospective Candidate involved in a recruitment process with an Employer, the Employer's privacy policy may apply to our processing of your personal information instead of, or in addition to, this Privacy Policy.

If you are not satisfied with any action taken by us or response given you have the right to complain to the Information Commissioner at www.ico.co.uk, or helpline telephone number: 0303 1231113. We are registered with the ICO and our registration number is ZA092181.

Definitions

In this policy the following terms shall have the following meanings:

Cookie: a small file placed on your computer or device by the website when you visit certain parts of the website.

Cookie Law: means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003.

Data Protection Legislation: up to but excluding 25th May 2018, the Data Protection Act 1988 and thereafter:



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- (a) Unless and until the GDPR ((EU) 2016/679) is no longer directly applicable to the UK, the GDPR and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK; and then
- (b) Any successor legislation to the GDPR or the Data Protection Act 1988.

Data Subject: a natural identifiable person.

Personal Data: has the meaning set out in the Data Protection Legislation, be at the date of this policy, any data which identifies a natural person (by way of example, name, address, phone number and so on).

What this policy covers:

This policy also explains:

- What personally identifiable information of yours is collected:
 - On the website when you interact with it;
 - When you download from the website;
 - When you interact with the website's advertising & applications on third party websites and services;
- What organisation is collecting the information;
- How the information is use
- With whom the information may be shared;
- What choices are available to you regarding the collection, use and distribution of the information;
- What kind of security procedures are in place to protect the loss, misuse or alternation of information under the Website's control;
- How you can correct any inaccuracies in the information; and
- How you can request the information we process and store to be removed.

There are other terms that may apply to you. In addition to this policy, please refer to our Terms of Use. We may update and change these terms and our website from time to time for a variety of reasons. By way of example: to reflect the changes to the services we offer, user's needs, regulatory or legal requirements. Every time you wish to use the website, please check these terms to ensure you understand the terms that apply at that time.

Children under the age of 16

Persons under the age of 16 are not eligible to use our service and we ask that minors do not submit any personal information to us. We will not knowingly accept any data from a person who is under the age of 16 years.

Information we may collect from you

We may collect and process the following information about you:

- Information that you provide by filling in forms hosted by 'The Employer' on the website www.wearelanded.com/careers/companyname (**Website**). This includes information provided at the time of registering to use the Website, subscribing to our Services, posting material or requesting further information or services.



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- We may also ask you for information when you report a problem with the Website.
- Specifically, if you are a Candidate, information relating to your employment history, skills and experience that you upload to the Website, as well as profile photos, links to your social profiles and other publicly available information that we may collect through a third-party service.
- Specifically, if you are a Customer organisation (i.e. an Employer organisation), information regarding job Openings and other details regarding your organisation and its personnel.
- If you contact us for support or general queries, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of all actions that you carry out through the Website and of the provision of services to you.
- Details of your visits to the Website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to our site and the resources that you access.

How we store your personal data

We take appropriate measures to ensure that all personal data is kept secure for the duration of your use of our Services.

Unfortunately, the transmission of information via the internet is not completely secure. We will take steps reasonably necessary to ensure that your data is treated securely in accordance with this policy; however, any transmission remains at your own risk. Once we have received your information, we will use strict procedures and security features in order to prevent unauthorised access.

The data we collect from you will not be transferred outside the European Economic Area ("EEA") save in relation to data submitted to our support desk, or data submitted to an Employer knowingly located outside the EEA. By submitting Personal Data, you agree to this transfer, storing or processing.

If you have any questions about how we store and use data collected which relates to you, please contact us by email, support@wearelanded.com.

IP Addresses and cookies

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration, customer support and to collect aggregate information for internal reporting purposes.

In addition, our Website uses cookies. A cookie is a small file of letters and numbers that we put on your computer if you agree. These cookies allow us to distinguish you from other users of the Website, which helps us to provide you with a good experience when you browse our Website and also allows us to improve the Website.

The cookies we use are "analytical" cookies. Some of the common uses for our cookies are as follows:

- to recognise and count the number of visitors and to see how visitors move around the site when they are using it. This helps us to improve the way our Website works, for example by ensuring that users are finding what they are looking for easily.
- to identify and authenticate a user across different pages of our Website, within our own Website, in a session or across different sessions. This is so that the user does not need to provide a password on every page the user visits; and
- to be able to retrieve a user's previously stored data, for example, information that the user previously submitted to the Website, so as to facilitate reuse of this information by the user.

Uses made of your information

We use information held about you in the following ways:

- To ensure that content from the Website is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us, whether you are a Customer, Candidate or otherwise, including but not limited to the terms of use upon which you access the Website.
- To understand our customers requirements and preferences, perform analysis and comparisons.
- To notify you about changes to our Services and provide you with information that is relevant to your use of the Services.
- To collect publicly available information related to companies or Candidates, which may be reused for business justifiable reasons and in accordance with applicable law.
- If you are a Candidate or prospective Candidate, to enhance any information that we process about you on an Employer's behalf with information obtained from third party data providers.
- To offer support in the event that you have a problem or an issue with the website.

Your Rights

As a Data Subject under the Data Protection Legislation you have the following rights:

- You have the right to ask us not to process your personal data for marketing purposes. If you submit an enquiry form on The Website you give your consent to LANDED contacting you for marketing purposes. We will not share your information with third party marketing agencies without your consent. You can exercise your right to prevent such processing by checking

boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at: support@wearelanded.com .

- You have the right to ask us to supply to you the information we hold, this is known as a data subject request. For further details please contact support@wearelanded.com.
- You have the right to ask us to rectify the data we hold in the event that it contains inaccuracies or is incomplete. To discuss this please contact us at support@wearelanded.com.
- You have the right to ask us to erase Personal Data we hold if:
 - It is no longer necessary for us to hold the data
 - You wish to withdraw your consent to us holding the data
 - You object to us holding or processing the data
 - You believe that we have processed the data unlawfully
 - The data needs to be erased for us to comply with a particular legal obligation.

To make a request please contact us at: support@wearelanded.com

Disclosure of your information

We may disclose your personal information to any member of our company, we may also disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- specifically if you are a Candidate, to make your details available to third party Employer organisations to whom you apply for Openings for the purposes of evaluation for job vacancies.
- 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 our Website Terms and Conditions and other agreements, but we will endeavour to minimise such disclosure to only that reasonably necessary and, where possible, to provide you with notice of such disclosure; and/or
- to protect the rights, property, or safety of Onboard Staffing Solutions Ltd, the Website, our users and any third party we interact with to provide the Website.

Retention and restriction on use of your personal data

Your personal information will be retained until it is deleted. Your personal information will be deleted on one of the following occurrences:

- Request for deletion of your personal information by you (or by another person engaged by the Customer, where you are using the Website and/or Services on behalf of a Customer).



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- Where you are a Candidate, deletion of your personal information by an Employer on whose behalf we are processing your personal information.
- Receipt of a written request by you to us.

Where you request in writing that your personal information is not used to enhance the information that we process about you on an Employer's behalf, such enhanced information will not be provided by us to the Employer.

Any request by you to us to delete your personal information will not result in deletion of any application submitted by you to an Employer (in respect of which we are a data processor and not a data controller). If you require an Employer to delete an application, or any other information provided by you to the Employer directly, you must contact the Employer to request such deletion.

Third Party Websites

The Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and terms of use and that we do not accept any responsibility or liability for these policies and terms of use. Please check these policies before you submit any personal data to these websites.

External Web Services & Links

We use a number of external web services on the Website, mostly to display content or support our services. This is not an exhaustive or complete list of the services we use, or might use, in the future when embedding content, but these are the most common. We cannot prevent these third-party sites, or external domains, from collecting information on your usage of this embedded content. If you are not logged in to these external services then they will not know who you are but are likely to gather anonymous usage information eg: number of views, loads, click throughs etc.

Email Tracking: some emails that we send have tracking on so that we can tell how much traffic those emails sent to the Website & client application pages.

Suppliers & Other Service Providers: From time to time we use third party suppliers and service providers to facilitate our services. Where any service provider collects information directly from you, you will be notified of the involvement of the suppliers or service provider, and all information disclosures you make will be strictly optional.

Control of your Password

You must not disclose your LANDED password (Client or Applicant Portal) to any third parties, nor share with any third parties. If you lose control of your password you may lose control over your Personal Data which in turn may commit you to legally binding obligations without your consent. Therefore, if your password has been compromised for any reason, you should immediately contact us at: support@wearelanded.com.



Access to information

Data Protection Legislation gives you the right to access information held about you. Your right of access can be exercised in accordance with the Data Protection Legislation.

Changes to our privacy policy

We reserve the right to modify this Privacy Policy at any time. Any changes we may make to our Policy in the future will be notified and made available to you using the Website. Your continued use of the Services and the Website shall be deemed your acceptance of the varied Privacy Policy.

Contact

All questions, comments and requests regarding this Privacy Policy should be addressed to support@wearelanded.com