

## 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

## 2. Responsibilities

- 2.1 All employees of UWAVE Ltd (also “HiredGrad”) who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject’s attention and their consent to the processing of their data is secured.

## 3. Privacy notice

### 3.1 Who are we?

UWAVE Ltd owns and operates an online recruiting platform called [www.hiredgrad.com](http://www.hiredgrad.com) under the trading name “HiredGrad”. HiredGrad is a registered trademark of UWAVE Ltd. HiredGrad connects jobseekers with companies for jobs, and organizes recruiting events and programs in partnership with student societies of universities. All jobseekers, societies and companies can create an account on HiredGrad if interested.

The personal data we would like to collect from and process on you is:

<b>Personal data type:</b>	
Candidate data (name, email, phone number, CV, preferred location, preferred job function, availability for job, race, ethnicity, gender, sexual orientation)	From the candidate while the candidate is signing up
Company data (name, point of contact (POC), POC name, POC email, POC phone number, website, industry, about us, social media page links, jobs)	From the company while the company is signing up
Society data (name, point of contact (POC), POC name, POC email, POC phone number, website, society)	From the society while the society is signing up

interest, society member interest, list of society members)	

The personal data we collect will be used for the following purposes:

- Matching jobs and companies with suitable candidates based on matching criteria
- Notifying relevant jobs to candidates based on matched criteria
- Notifying companies about candidates that have applied to their jobs

Our legal basis for processing for the personal data:

- Scope of usage of data is limited to the purposes of recruiting
- Consent is obtained from the user when the user signs up to share data with other relevant users for the purposes of recruiting

The special categories of personal data concerned are:

- Race
- Ethnicity
- Gender
- Sexual orientation

### 3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for UWAVE Ltd to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by emailing us on [hello@hiredgrad.com](mailto:hello@hiredgrad.com).

### 3.3 Disclosure

UWAVE Ltd will not pass on your personal data to third parties without first obtaining your consent.

### 3.4 Retention period

UWAVE Ltd will process personal data indefinitely till you may ask us not to do so and will store the personal data indefinitely till you may ask us not to do so.

### 3.5 **Your rights as a data subject**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

### 3.6 **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by UWAVE Ltd, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and UWAVE Ltd's data protection representatives reachable at [hello@hiredgrad.com](mailto:hello@hiredgrad.com).

### 3.7 **Detailed privacy statement**

Read more about how and why we use your data in the Annexure.

## 4. **FAQ - Online privacy statement**

## How we use your information

This privacy notice tells you how we, UWAVE Ltd, will collect and use your personal data.

## Why does UWAVE Ltd need to collect and store personal data?

In order for us to provide you the full scope of services under HiredGrad, we need to collect personal data for matching the right candidates with the right companies or jobs, and organize recruiting events and programs. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes, UWAVE Ltd would contact you for additional consent.

## Will UWAVE Ltd share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to UWAVE Ltd in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service of matching companies and jobs with candidates they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with UWAVE Ltd's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

## How will UWAVE Ltd use the personal data it collects about me?

UWAVE Ltd will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. UWAVE Ltd is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

## Under what circumstances will UWAVE Ltd contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to

rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

### Can I find out the personal data that the organisation holds about me?

UWAVE Ltd at your request, can confirm what information we hold about you and how it is processed. If UWAVE Ltd does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of UWAVE Ltd or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

### What forms of ID will I need to provide in order to access this?

UWAVE Ltd accepts the following forms of ID when information on your personal data is requested:

Passport, driving licence, birth certificate, utility bill (from last 3 months).

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# PRIVACY NOTICE & POLICY

**Document Control**  
Reference: GDPR REC 4.1  
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Issue Date: 24-May-2018  
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## Change History Record

Issue	Description of Change	Date of Issue
1	Initial issue	24/05/2018

## ANNEXURE

### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

### **Key points**

HiredGrad enables you, as a jobseeker, to upload your CV and be connected directly to the hiring manager if your skills are relevant. If you are an employer, it enables you to submit a request for candidates to help us fulfill your job openings. We will never rent or sell your information to third parties, and we take your privacy extremely seriously. We use cookies on HiredGrad just like all **great** websites do. Please disable cookies in your browser if you don't wish to receive cookies from us.

### **1. What Does This Privacy Policy Cover?**

We at HiredGrad ("we," "us," "our") know that our users ("you," "your") care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about our Privacy Policy. By visiting or using the [www.hiredgrad.com](http://www.hiredgrad.com) website and domain name, and any other linked pages, features, content, mobile applications, or any other services we offer from time to time by in connection therewith (collectively, the "Website," or the "Services"), in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.

This Privacy Policy covers our treatment of personally identifiable information ("Personal Information") that we gather when you are accessing or using our Website. This policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage.

We do not knowingly collect or solicit personal information from anyone under the age of 16 or knowingly allow such persons to register for the Services. If you are under 16, please do not attempt to register for the Services or send any information about yourself to us, including your name, address, telephone number, or email address. No one under age 16 may provide any personal information to us or on the Services. In the event that we learn that we have collected personal information from a child under age 16 without verification of parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 16, please contact us at [hello@hiredgrad.com](mailto:hello@hiredgrad.com).

## **2. What Information Does HiredGrad Collect?**

We gather various types of Personal Information from our users, as explained more fully below. We may use this Personal Information to personalize and improve our services, to allow our users to set up a user account and profile, to contact users, to fulfill your requests for certain products and services, to analyze how users utilize the Website, and as otherwise set forth in this Privacy Policy. We may share certain types of Personal Information with third parties (as described in this Section and in Section III below). We collect the following types of information:

### **A. Information You Provide to Us:**

We receive and store any information you knowingly provide to us. For example, we collect Personal Information such as your name, user name, email address, contact information, employment history and details, resume, and personal preferences regarding employment, and we may collect other employment-related information as our services and products are further developed. If you provide your third-party account credentials to us or sign in through a third party website or service, you understand some content and/or information in those accounts ("Third Party Account Information") may be transmitted into your account with us, and that Third Party Account Information



transmitted to our Website is covered by this Privacy Policy. You can choose not to provide us with certain information, but then you may not be able to register with us or to take advantage of some of our features.

## **B. Information Collected Automatically:**

Whenever you interact with our Website, we automatically receive and record information on our server logs from your browser including your IP address, "cookie" information, and the page you requested. "Cookies" are identifiers we transfer to your computer or mobile device that allow us to recognize your browser or mobile device and tell us how and when pages in our Website are visited and by how many people. You may be able to change the preferences on your browser or mobile device to prevent or limit your computer or device's acceptance of cookies, but this may prevent you from taking advantage of our Website's best features.

When we collect usage information (such as the numbers and frequency of visitors to the Website), we only use this data in aggregate form, and not in a manner that would identify you personally. For example, this aggregate data tells us how often users use parts of the Website, so that we can make the Website appealing to as many users as possible. We may also provide this aggregate information to our partners; our partners may use such information to understand how often people use our Website, so that they, too, can provide you with an optimal online experience. We never disclose aggregate information to a partner in a manner that would identify you personally.

## **C. E-mail and Other Communications:**

We may contact you, by email or other means; for example, we may send you promotional offers, or communicate with you about your use of the Website or the Product. Also, we may receive a confirmation when you open an email from us. This confirmation helps us make emails more interesting and improve our service. If you do not want to receive email or other mail from us, you may unsubscribe through your notification settings or indicate your preference by emailing us at [hello@hiredgrad.com](mailto:hello@hiredgrad.com).

We may contact you via email in case we shortlist you for an open position at a company that uses our Services. We will send your profile to the hiring manager of that company only after your approval.

### **3. Will HiredGrad Share Any of the Personal Information It Receives?**

We neither rent nor sell your Personal Information in personally identifiable form to anyone. We share your Personal Information in personally identifiable form with third parties only as described below.

#### **A. Interaction With Employers:**

User profile information including, without limitation, your name, email address and other contact information, employment history and other employment details (including information that may have been automatically transmitted to your Website account from a third party site or service) (“User Profile Information”), may be displayed to Employers (as that term is defined in our Terms of Service ([www.hiredgrad.com](http://www.hiredgrad.com)) in accordance with the preferences you have indicated and the functionality of the Website, in order to facilitate interaction between you and Employers.

#### **B. Affiliated Businesses and Third Party Websites We Do Not Control:**

In certain situations, businesses or third party websites we're affiliated with may sell items or provide services to you through the Website (either alone or jointly with us). You can recognize when an affiliated business is associated with such a transaction or service, and we will share your Personal Information with that affiliated business only to the extent that it is related to such transaction or service. One such service may include the ability for you to choose to automatically transmit Third Party Account Information to your Website profile or to automatically transmit information in your Website profile to your third party account.

We have no control over the policies and practices of third party websites as to privacy or anything else, so if you choose to allow these automatic transmissions, please review all third party websites' policies.

## **C. Agents:**

We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us.

## **D. Business Transfers:**

We may choose to buy or sell assets. In these types of transactions, customer information is typically one of the business assets that is transferred. Also, if we (or substantially all of our assets) are acquired, or if we go out of business or enter bankruptcy, Personal Information would be one of the assets transferred to or acquired by a third party.

## **E. Protection of HiredGrad and Others:**

We may release Personal Information when we believe in good faith that release is necessary to comply with laws; enforce or apply our conditions of use and other agreements; or protect the rights, property, or safety of HiredGrad, our employees, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

## **F. With Your Consent:**

Except as set forth above, you will be notified when your Personal Information may be shared with third parties, and will be able to prevent the sharing of this information.

## **4. Is Personal Information About Me Secure?**

Your account is protected by a password for your privacy and security. You need to prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.

We endeavor to protect the privacy of your account and other Personal Information we hold in our records, but we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

The Website may contain links to other sites. We are not responsible for the privacy policies and/or practices on other sites. When following a link to another site you should read that site's privacy policy.

## 5. What Personal Information Can I Access?

Through your account settings, you may access, and, in some cases, edit or delete your Personal Information. The information you can view and update may change as the Website changes. If you have any questions about viewing or updating information we have on file about you, please contact us at [hello@hiredgrad.com](mailto:hello@hiredgrad.com).

## 6. What Choices Do I Have?

You can always opt not to disclose information to use, but keep in mind some information may be needed to register with us or to take advantage of some of our features.

You may be able to add, update, or delete information as explained in Section 5 above. When you update information, however, we may maintain a copy of the unrevised information in our records. Please note that some information may remain in our private records after your deletion of such information from your account. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.

You may request deletion of your account with HiredGrad by emailing us at [hello@hiredgrad.com](mailto:hello@hiredgrad.com).

If you do not wish to receive email or other mail from us, please email us at [hello@hiredgrad.com](mailto:hello@hiredgrad.com). Please note that if you do not want to receive legal notices from us, such as this Privacy Policy, those legal notices will still govern your use of the Website and the Product, and you are responsible for reviewing such legal notices for changes. Please also note that once Employers have your contact information, we are not able to control the manner or frequency in which they contact you; if you would like to stop receiving messages from Employers, please indicate your preference to those Employers directly.

## 7. Changes to This Privacy Policy

We may amend this Privacy Policy from time to time. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is used. If we make changes in the way we use Personal Information, we will notify you by posting an announcement on our Website or sending you an email. You are bound by any changes to the Privacy Policy when you use the Website or the Product after such changes have been first posted.

## 8. Questions or Concerns

If you have any questions or concerns regarding our privacy policies, please send us a detailed message to [hello@hiredgrad.com](mailto:hello@hiredgrad.com). We will make every effort to resolve your concerns.