PRIVACY NOTICE

Zest Education ("We") are committed to protecting and respecting your privacy.

Any mention of "Our Group" means our subsidiaries, our ultimate holding company and its subsidiaries, our associated companies as defined in section 1159 of the UK Companies Act 2006 (our Group).

This notice together with our terms of use sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

The UK General Data Protection Regulation (UK GDPR) (Regulation (EU) 2016/679) is a regulation which replaces the Data Protection Regulation (Directive 95/46/EC). The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

The Brexit transition period ended on 31 December 2020 and the UK has now officially left the EU. The UK GDPR has been directly incorporated into UK law sitting alongside the Data Protection Act 2018.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purposes of data protection legislation in force from time to time the data controller is Zest Education of Unit 10 City Arcade, Bore Street, Lichfield, WS13 6LZ.

Our Data Protection Officer is Beth Mercer.

Who we are and what we do

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Businesses Regulations 2003 (our business). We collect the personal data of the following types of people to allow us to undertake our business;

- Prospective and placed candidates for permanent or temporary roles;
- Prospective and live client contacts;
- Supplier contacts to support our services;
- Employees, consultants, temporary workers;

We collect information about you to carry out our core business and ancillary activities.

Information you give to us or we collect about you.

This is information about you that you give us by filling in forms on our site www.zesteducation.co.uk (our site) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, to enter our database, subscribe to our services, attend our events, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site.

The information you give us or we collect about you may include your name, address, private and corporate e-mail address and phone number, financial information, compliance documentation and references verifying your

qualifications and experience and your right to work in the United Kingdom, curriculum vitae and photograph, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, business Facebook or corporate website.

Information we collect about you when you visit our website.

With regard to each of your visits to our site we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information if applicable, browser type and version, [browser plug-in types and versions,] [operating system and platform,]

- information about your visit, including [the full Uniform Resource Locators (URL),] [clickstream to, through and from our site (including date and time),] [products you viewed or searched for'] [page response times,] [download errors,] [length of visits to certain pages,] [page interaction information (such as scrolling, clicks, and mouse-overs),] [methods used to browse away from the page,] [OTHER] and any phone number used to call our customer service number.

Information we obtain from other sources.

This is information we obtain about you from other sources such as [LinkedIn, corporate websites, job board websites, online CV libraries, your business card, personal recommendations, and other sources]. In this case we will inform you, by sending you this privacy notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from and whether it came from publicly accessible sources, and for what purpose we intend to retain and process your personal data.

Purposes of the processing and the legal basis for the processing

We use information held about you in the following ways:

- To carry out our obligations arising from any contracts we intend to enter into or have entered into between you and us and to provide you with the information, products and services that you request from us or we think will be of interest to you because it is relevant to your career or to your organisation.
- To provide you with information about other goods and services we offer that are similar to those that you have already purchased, been provided with or enquired about.
- The core service we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of temporary or permanent engagement. However, our service expands to supporting individuals throughout their career and to supporting businesses' resourcing needs and strategies.

Our legal basis for the processing of personal data is our legitimate interests, described in more detail below, although we will also rely on contractual obligations to which you are subject, legal obligations and consent for specific uses of data.

We will rely on contractual obligations if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation in some cases, where we are required by law or regulation to process your data.

We will in some circumstances rely on consent for particular uses of your data. Where we rely on consent, you will be asked for your express consent. An example of when we will rely on consent as the legal basis for processing your data is when we process your data for marketing purposes.

Our Legitimate Interests

Our legitimate interests in collecting and retaining your personal data is described below:

As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts. The exchange of personal data of our candidates and our client contact details is a fundamental part of this process.

In order to support our candidates' career aspirations and our clients' resourcing needs, we require a database of candidate and client personal data. The database will contain historical information as well as current resourcing requirements.

To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts.

Consent

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system. Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

Other Uses we will make of your data:

We will also use your data:

- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To improve our site to ensure that content is presented in the most effective manner for you when you are using your computer or other devices;
- To notify you about changes to our service;
- To allow you to participate in interactive features of our service, when you choose to do so;
- As part of our efforts to keep our site safe and secure;
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

We do not undertake automated decision making or profiling. We use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision making process. *If automated decision making or profiling is used, we will provide information about how decisions are made, the significance and the consequences of the decision making.*

Do you have to provide us with personal data?

You may refuse to give us your personal and sensitive personal data. Furthermore, you have the right to ask us to delete, change or stop processing your data that we have already received or collected. If you do not provide us with personal or sensitive personal data, or if you request a restriction of processing however, we may not be able to provide you with the services that you have requested and that are stated in this policy.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

Disclosure of your information inside and outside of the UK and the EEA

We will share your personal information with:

Any member of our group both in the UK, the EEA and outside of the EEA.

Selected third parties including:

- Clients for the purpose of introducing candidates to them;
- Candidates for the purpose of arranging interviews and engagements;
- Clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you;
- subcontractors including email marketing specialists, event organisers, payment and other financial service providers
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience];
- Analytics and search engine providers that assist us in the improvement and optimisation of our site;
- Credit reference agencies, our insurance broker, compliance partners and other sub-contractors for the purpose of assessing your suitability for a role where this is a condition of us entering into a contract with you.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Zest Education substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- 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 terms of use and other agreements; or to protect the rights, property, or safety of Zest Education, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

The lawful basis for the third party processing will include:

- Their own legitimate interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- Satisfaction of their contractual obligations to us as our data processor;
- For the purpose of a contract in place or in contemplation;
- To fulfil their legal obligations.

Where we store and process your personal data

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted [using SSL technology]. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Retention of your data

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate interests and that you are happy for us to do so. Accordingly, we have a data retention notice and run data routines to remove data that we no longer have a legitimate interest in maintaining.

We do the following to try to ensure that the data we hold on you is accurate:

- our website enables you to manage your data and to review whether the details we hold about you are accurate
- prior to making an introduction we check that we have accurate information about you
- we keep in touch with you so you can let us know of changes to your personal data

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data include:

- the nature of the personal data;
- its perceived accuracy;
- our legal obligations;
- whether an interview or placement has been arranged; and
- our recruitment expertise and knowledge of the industry by country, sector and job role.

We may store and handle your data in the following ways:

- We may archive part or all of your personal data, retain it on our financial systems only or delete all or part of the data from our main Customer Relationship Manager (CRM) system.
- We may pseudonymise parts of your data, particularly following a request for restriction or erasure of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

Our current retention notice is available upon request.

Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for marketing purposes or if we intend to disclose your information to any third party for marketing purposes. We will collect express consent from you, if legally required, prior to using your personal data for marketing purposes.

You can exercise your right to accept or prevent processing for marketing purposes by checking the boxes on the forms we provide you when we collect your data. You can also exercise the right to not have your data used for marketing purposes at any time by contacting us at hello@zesteducation.co.uk.

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

The UK GDPR provides you with the right to:

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party in certain formats, if practicable.
- **Make a complaint** to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: https://ico.org.uk/concerns/.

Access to information

The Data Protection Act 2018 and the UK GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete. Your right of access can be exercised in accordance with the Act and the UK GDPR.

A subject access request should be submitted to hello@zesteducation.co.uk. No fee will apply unless the requests from a data subject are manifestly unfounded or excessive, in particular because of their repetitive character. In such circumstances, we may charge a fee or refuse to act on the request.

Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.

Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to hello@zesteducation.co.uk.