

PRIMARY TALENT INTERNATIONAL LIMITED

Website Privacy Policy (incorporating Cookies Policy)

Your privacy is very important to us and we will always endeavour to comply with the latest applicable data protection measures to ensure fairness, transparency, accuracy, security, minimisation and respect for your rights with regard to your personal data which we gather.

So, to comply with the latest European General Data Protection Regulation (GDPR) we have updated our Privacy Policy. We also endeavour to work with reputable third party sub-contractors and others who have the same data protection principles.

We strive to give our website visitors the best experience possible with the best choice of content, with speed, accuracy and relevance whilst at the same time protecting their privacy.

We hope that we have found the right balance through this privacy policy. This is what this means in terms of what we may collect when you visit our website, what we do with it and what you can tell us to do with it.

By using our website, we invite you to consent that you agree that we may collect and use your personal information in this way. You may also withdraw that consent at any time.

Our website will typically collect the type of personal information mentioned below from and about you when you visit, browse or use our website.

If we exchange emails or other communications or enter into any other relationship with you, we also obtain additional personal information but again we will use our best endeavours only to use or disclose such information in the manner stated below.

1. The type of Personal Information which we/our sub-contractors and others may gather from you or from Third Parties.

Each time you use our website, we collect some or all of the following information either directly from your own disclosure or through our website software:

- Your IP address, browser type and location, unique device identifiers, language preference, the date, time and frequency of your visits, which pages you viewed and for how long and if you clicked, copied or downloaded any material, and similar information from your general online use and preferences, gathered by the use of cookies and similar technologies (please see paragraph 9 below);
- Any material that you viewed, used, copied, downloaded or clicked a link to access;
- your acceptance (or otherwise) to receive any publications, newsletters, updates or other material or media from us or any of our providers;

- your consent (or otherwise) to this Privacy Policy and your agreement to our Terms and Conditions.

If we need to verify your age and/or identity for any reason (for example, payment verification, fraud prevention or dispute resolution) we may also ask you for your age (only to confirm that you are of legal age to contract), passport/ID/Visa/driver's licence (these documents will also have your place of birth, gender, nationality and a facial image of you), your social security/national insurance number, or any other identifier if required for identifying you as a specific individual.

If we want to identify you further to gain a better profile or business relationship with you, we may use the material which you have included on publicly available websites such as that of your own website, LinkedIn, Facebook, Instagram and other social media sites, which may include additional information or photographs.

You can access your personal details at any time, ask us to update the information we hold or to delete it altogether (please see paragraph 7 below) for your rights over your personal information).

2. Communicating with you

We reserve the right to send you email, sms or other communications from time to time regarding updates and changes to our content, material or services; or about new links, partners, providers or suppliers to our website. You can choose not to receive this material by unsubscribing.

If we require to email you any technical support, administrative or legal notices important to our website, our content, material or services that we consider essential that you know, including any breach of security relating to your personal information; you will not be able to unsubscribe from these notices as they may contain, for example, new privacy terms, conditions or situations, important instructions on use of or updates to our content, material and/or services which you have subscribed to from us.

3. How your Personal Information is used by us

We want to give you the best experience possible with the best choice of content, material and/or services that we can with speed, accuracy and relevance.

To do this, we need to collect sufficient information about you and users in general to enable us to operate the website and keep it current, up-to-date, relevant to users' needs and preferences now and in the future as well as to keep it secure and in compliance with the applicable law.

We also need to use your personal information for the purposes specified in paragraph 1 above (your consent and identity) as well as:

- to respond to and answer your queries, comments or complaints;

- to operate our website professionally, efficiently and legally and ensure its security (as well as your security), maintenance, upgrade and enhancement (please see paragraph 5 below and our Terms and Conditions);
- for business and statistical analysis by our own staff and professional advisors;
- to provide you with information on updates, marketing, promotions, events, webinars and other material which you have consented/subscribed to or otherwise may expect from us as part of our general offering (you can unsubscribe from any of this material at any time); and
- for our legitimate interests and such other internal business reasons, including but not limited to disclosing your personal information to any employee, business adviser, consultant, partner, contractor, provider; risk management/credit reference/debt collection/fraud prevention agencies; compliance/fiscal/regulatory/legal or government bodies.

4. How long we will keep your Personal Information

We will only keep your personal information for as long as is necessary for the purposes for which it was gathered, given voluntarily by you, publicly available or otherwise processed as specified in this policy document. In certain circumstances, we may store it for a longer period if so required for example, by applicable laws, regulators, payment protection, law enforcement or for secure archiving. In any case of longer storage by us, the terms of this policy document will continue to apply.

5. Personal Information shared with Third Parties

We will not sell, rent or otherwise disclose your personal information to any third party without your consent except in the following circumstances:

- Where we use or partner with trusted third party providers to provide services for us, including, for example, site security, hosting, management and other IT/professional/insurance and operational services. These companies will have access to only the personal information needed to perform their specific functions and not for any other purposes. They are bound by confidentiality agreements as well as their own privacy policies to which you may also be given the opportunity to accept or decline. Please note that we are not responsible for the privacy practices of such other third parties and advise you to read the privacy statements of each. Your use of such third parties is at your own risk.
- If we require to disclose your personal information to an appropriate investigative third party, for example, if we have reason to believe that you may be involved in any illegal or harmful conduct or if we are required to do so under the applicable law, by a law enforcement or government authority or if we believe that such action is necessary to:
 - (1) comply with the law or with legal process;

- (2) protect and defend our rights, security or property or that of our clients or providers;
 - (3) prevent fraud and other legal acts;
 - (4) protect against abuse, misuse or unauthorised use of our website in any way; or
 - (5) protect our personal safety or property and that of our website visitors, clients, providers or the public (e.g. if you provide false or deceptive information about yourself or attempt to pose as someone else or defame/libel any party we will disclose such information about you in order to assist any type of investigation into your actions).
- We may share non-personal, non-individual information in aggregate form with third parties for business purposes, for example with advertisers or prospective advertisers on our website or we may tell our business partners or prospective business partners the number of website visitors in certain demographic groups who viewed or subscribed to certain content, material or services or share other statistical analyses. This does not involve disclosing any personal information which can identify any individual website visitor in any way.
 - We may transfer our database, including personal information contained therein, to a third party who acquires all or substantially all of the assets or stock in our company or our website service whether by merger, acquisition, reorganisation or otherwise. They will be bound to protect your personal information to no lesser standard than we do so in this policy.
 - Where a specific third party provider asks you to accept their own privacy policy, for example, any social media.

7. Your rights over your Personal Information

You have the right to:

- Access your personal information that we have about you and to have us correct, update, restrict, anonymise, block or have us delete it (unless we are legally obliged to keep it);
- Withdraw your consent at any time to all or any particular service for example, remove your name from marketing material. Contact datacontroller@primarytalent.com
- Request us to send you a copy, free of charge, of your personal information that we have about you;
- Request us to transfer your personal information to another person, organisation or business of your choosing.

- Make any complaint by contacting us at datacontroller@Primarytalent.com or the information commissioner, regulator or data protection officer in your country of residence if you do not believe that we have handled your personal information correctly or have another complaint.

In order to comply with any of the above requests, we will require you to identify yourself or if you have appointed an authorised third party to act on your behalf, then we will ask them to prove that they have your authority to act in this capacity.

All these requests should be directed to: datacontroller@Primarytalent.com

8. Links

Our website contains hyperlinks to other websites owned and operated by independent third parties. Please note that we are not responsible for the privacy practices of such other third party websites and advise you to read the privacy statements of each website you visit which collects your personal information. Your use of such third party websites is at your own risk.

9. Cookies and similar technologies

A cookie is an alphanumeric identifier which we transfer to your hard drive through your web browser when you visit our website from whatever device you are using. Pixel tags (also called web beacons) are small blocks of code placed on websites and e-mails.

We use cookies, pixel tags and other similar technologies to help us identify and track visitors, usage and access preferences for our website content, material, products and/or services including third party products and/or services and hyperlinks) as well as track and understand, for example, an email campaign effectiveness and to deliver targeted material.

These technologies enable our own system to recognise you when you visit our website again and improve our service to you and to help us give you the best client experience possible with the best choice of content, material and/or services with speed, accuracy and relevance. Cookies may also be used to compile aggregate information about areas of our website that are visited most frequently.

This traffic information can be used to enhance the content of our website and make your use of it easier. If you wish to reject our cookies and other similar technologies, you can activate the setting on your browser which will enable you to do so, for example:

Internet Explorer - <https://www.microsoft.com/info/uk-en/cookies.mspx> ;

Safari - https://support.apple.com/kb/ph19214?locale=en_US

Please note: If you do switch off these technologies, then it will affect how you view and use our website and some functionality will not be available to you. To find out more about using your browser settings to control cookies please visit:

www.allaboutcookies.org

10. Updating our Privacy policy

We will update our Privacy Policy and procedures from time to time to make sure they properly, effectively and legally cover your personal information and are up-to-date. We will publish the updated policy on our website so please check it regularly. If there are changes which are important to bring to your notice we will advise you accordingly on our website and/or seek your further consent if so required by the applicable law.

11. Who we are and How to contact us

We are:

Primary Talent International Ltd.

Our Registered Office is at:

107 Bell Street,
London NW1 6TL
England

You can contact us at our Business Address which is at:

10-11 Jockey's Fields
London WC1R 4BN
England

We are registered in England - company registration number: 02507741

If you have any questions about our Privacy policy, please contact us at datacontroller@Primarytalent.com