

JobAdder Privacy Policy

UPDATED 9 April 2021

JobAdder Operations Pty Ltd ACN 167 597 953, a company registered in Australia (“**we**” “**us**” or “**our**”) is committed to protecting and respecting your privacy.

This privacy policy (together with our terms of use <https://jobadder.com/terms> and any other documents referred to in it) sets out the basis on which any personal data that we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <https://jobadder.com> (our “**website**”) or using our SaaS online recruitment software platform (the “**Service**”) you are accepting and consenting to the practices described in this policy.

If you are a citizen or resident of the European Union or United Kingdom, the General Data Protection Regulation (EU) 2016/679 or Data Protection Act 2018 (UK) (collectively, “**GDPR**”) will apply to your personal data.

For the purposes of the GDPR, the data controller is:

- in the instance where your personal data is provided to, or collected by, us in connection with our provision of services (including support services) to you or the organisation that you are part of: JobAdder Europe Limited with registered office address at 10 John Street, London, United Kingdom, WC1N 2EB; and
- in the instance where your personal data is provided to, or collected by, any licensee of our services, including without limitation our online recruitment software system: the Licensee (as defined in clause 1.1(a) below) on whose behalf we may process such personal data.

If you are a citizen or resident of Australia, New Zealand or any other country, the Australian Privacy Act 1988 (“**Australian Privacy Laws**”) will apply to your personal data.

“**Personal data**” is, unless otherwise indicated, the collective term used in this privacy policy to refer to ‘personal information’ as it is defined under Australian Privacy Laws, and ‘personal data’ as it is defined under the GDPR.

1 **Information we may collect from you**

We may collect and process the following data about you:

- ### 1.1 **Information you may provide to us.** The types of information you may provide to us depends on the nature of your dealings with us as follows:

- (a) If you are the representative of a licensed user ("**Licensee**") of our Service, you may give us information about individuals within your organisation at or before the time that you register with us. This includes information you provide when you take out a trial of the Service, accept a licence agreement, make an enquiry with us online, or subsequently in other ways, including if necessary to provide you with ongoing services. The information you give us may include names, position titles, addresses, telephone numbers, email addresses and other contact details.
- (b) Our Service is a Software-as-a-Service (SaaS) product. As such, information and data you provide by inputting into our software as a Licensee is held on servers owned by third party hosting providers and leased by us. Such data may include personal data relating to your clients and individuals within your organisations, including information about job candidates and potential candidates.
- (c) If you are one of our 'business contacts' (e.g. a contact person in one of our suppliers, or in an agency with which we deal), you may give us basic business contact information about you. This includes your name, title and work contact details.
- (d) If you are providing us with personal data about a third party, you warrant to us that you have that person's consent to disclose their personal data to us and that your use and disclosure of the information to us is in accordance with the GDPR. This paragraph is without prejudice to any obligations you may have to us as a Licensee under any licence agreement for use of our software or services.
- (e) Please note that we use a third party payment gateway provider to process payments, however we do not have access to credit card information, nor do we collect or store such information.

1.2 **Information we collect about you.** With regard to each of your visits to our website we may automatically collect the following information:

- (a) Technical information, including the Internet protocol (IP) address used to connect your computer, tablet, mobile or other device (each being a "**Device**") to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, information you post online either on our website or on a third-party social media site to which we have access.

(b) Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (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), and methods used to browse away from the page and any phone number used to call our customer service number.

1.3 **Information we receive from other sources.** We may receive information about you if you use any other websites that we operate or may operate from time to time or other services we provide. We may share information amongst members of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries ("**Affiliates**"). We may also work with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

2 **Disclaimer where we are carrying out the role of data processor (for the purposes of the GDPR where applicable)**

To the extent that we are carrying out the function as data processor for a third party controller in connection with any of your personal data, then we will comply with this privacy policy and the GDPR to the extent that it applies to us as a data processor, however to the fullest extent permissible by law, we disclaim all liability whatsoever for all duties, obligations or other legal requirements which are proper to such third party data controller, which for the avoidance of doubt may be the Licensee to whom access to our Service may have been provided.

3 **Analytic Tools, Cookies and Remarketing**

3.1 Our website and Service uses analytic tools (such as Google Analytics) and cookies to distinguish you from other users of our website or Service and monitor website and Service user activities and behaviours. This helps us to provide you with a good experience when you browse our website or Service and also allows us to improve them. By continuing to browse the website or Service, you are agreeing to our use of analytic tools cookies.

- 3.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your Device. Cookies contain information that is transferred to your device's hard drive or device.
- 3.3 We use the following cookies:
- (a) **Strictly necessary cookies.** These are cookies that are required for the operation of our website/Service. They include, for example, cookies that enable you to log into secure areas of our website/Service, use a shopping cart or make use of e-billing services.
 - (b) **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website/Service when they are using it. This helps us to improve the way our website/Service works, for example, by ensuring that users are finding what they are looking for easily.
 - (c) **Functionality cookies.** These are used to recognise you when you return to our website/Service. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
 - (d) **Targeting cookies.** These cookies record your visit to our website/Service, the pages you have visited and the links you have followed. We will use this information to make our website/Service and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.
- 3.4 Except for strictly necessary cookies specified in (a) above, all cookies will expire after 30 days.
- 3.5 If you do not wish cookies to be stored on your device, you can block them by activating the relevant setting on your browser which can usually be found in the "help" section. More information on how to do this is available here: www.allaboutcookies.org or www.youronlinechoices.eu. However please note that, if you use your browser settings to block cookies (including strictly necessary cookies) you may not be able to access all or parts of our website/Service. Your usage of the website/Service without changing your browser cookies settings will indicate your consent to usage of cookies in accordance with this section of our privacy policy. You can change your cookie settings at any time.

3.6 We may remarket our services to you in a targeted way, by using third party remarketing services (such as Google Ads or similar providers). Our third party remarketing vendors may advertise our services to you at multiple online locations. You agree to our use of these third party vendor remarketing services for the purpose of advertising to you in this way. You can withdraw your consent to this advertising at any time. Visit <http://optout.networkadvertising.org/#!/> for information on how to opt out.

4 **Uses made of your information**

We use information held about you in the following ways:

4.1 **Information you give to us.** We will use this information:

- (a) to provide our SaaS solution in accordance with the instructions of the relevant Licensee;
- (b) to carry out our obligations arising from any contracts entered into between you and us including the provision to you with information, products and services that you request from us, online content and dealing with your requests and enquiries;
- (c) to provide you with information about other products and services we offer that are similar to those that you have already purchased or enquired about;
- (d) to send newsletters or other communications on topics which may be of interest to our customers and to people who have requested information from us via our website (e.g. to provide a trial of our products or services, provide you with information on our products and services or other information requested);
- (e) where you have expressly consented to us contacting you for marketing purposes, to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. We will only provide your data to selected third parties for marketing purposes if you have expressly consented to this. If you do not want us to use your data in this way, please ensure that the relevant box is ticked or unticked as appropriate on the webpage where we collect your data, or click on the unsubscribe button on any email communication from us;
- (f) to notify you about changes to our service or products;

- (g) to contact you in relation to service updates that affect you, regulatory updates that affect our services and any additional information in relation to our service that we think you may find interesting;
- (h) to analyse and improve the services offered on our website/Service; and
- (i) to ensure that content from our website/Service is presented in the most effective manner for you and on your Device.

4.2 **Information we collect about you.** We will use this information:

- (a) to provide our SaaS solution in accordance with the instructions of the relevant Licensee;
- (b) to administer our website/Service and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- (c) to improve our website/Service to ensure that content is presented in the most effective manner for you and for your Device;
- (d) to allow you to participate in interactive features of our service, when you choose to do so;
- (e) as part of our efforts to keep our website/Service safe and secure;
- (f) to personalise the way the website/Service content is presented to you and provide you with the most user-friendly navigation experience. We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes;
- (g) to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- (h) to use IP addresses to identify the location of users, to block disruptive use, to establish the number of visits from different countries and to determine whether you are accessing the services from a particular country; and
- (i) to make suggestions and recommendations to you and other users of our website/Service about goods or services that may interest you or them.

4.3 **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information

and the combined information for the purposes set out above (depending on the types of information we receive).

5 Disclosure of your information

5.1 We may share your personal data with our Affiliates and third party service providers (e.g. who assist us with technical, payment and delivery services) in accordance with this policy.

5.2 We may also disclose your personal data 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 standard terms of use; or to protect our rights, property, our customers, clients, Affiliates, or other related third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

6 Security of information we store and transfer

6.1 All information you provide to us is stored on secured servers. Any payment transactions will be encrypted using Secure Sockets Layer (SSL) technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website or Service, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. It is important for you to protect against unauthorised access to your password and to your computer, so we advise that you sign off when you have finished using a shared computer and strongly recommend that you do not use the browser's password memory function as that would permit other people using your Device to access your personal data.

6.2 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 website/Service and any transmission is at your own risk.

6.3 Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access however, we cannot guarantee the security of such information. To the fullest extent permitted by law, we disclaim all liability and responsibility for any damages you may suffer due to any loss, unauthorised access, misuse or alterations of any information you submit to the website or our Service.

7 Overseas disclosure

7.1 The data that we collect from you may be transferred to, and stored at, a destination outside Australia, New Zealand, UK or the European Economic Area ("**EEA**"), that does not have a similar standard of protection to Australia, New Zealand, UK or the EEA (as applicable). It may also be processed by staff operating outside these areas who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of any order, the processing of payment details and the provision of support services. This may include the transfer or disclosure of your information to other jurisdictions including but not limited to the United States and Canada.

7.2 We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

8 **How long do we keep your personal data secure and private**

We will keep your personal data only for as long as is reasonably necessary for the purpose that it has been processed and taking into account any legal requirements under the GDPR, or any other applicable laws of England and Wales (if you are located in the UK), and under Australian Privacy Laws (if you are located in a country other than the UK or EU).

9 **How we manage sensitive personal data**

The GDPR defines certain information as 'sensitive' (racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, criminal proceedings and offences). If we ever deal with sensitive personal data we will only use this information to provide the service you require and we will ask for your explicit consent. As a customer, there may be times when you give us this sensitive information. We may share it with our Affiliates and our subcontractors to keep your records up to date.

10 **Your rights**

10.1 You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the pages we use to collect your data. You can also exercise the right at any time by contacting us at support@jobadder.com.

10.2 You can always choose not to provide information, however in that event we may not be able to provide you certain services, or fully provide you certain services.

- 10.3 You will usually be able to add or update certain information on pages such as "My Account". When you update information, we will keep a copy of the prior version for our records unless you write to us to require us not to.
- 10.4 The GDPR and Australian Privacy Laws give you the right to access information held about you and to request that it is corrected if any of your details held are incorrect. Your right of access can be exercised in accordance with the GDPR or Australian Privacy Laws, as applicable. Any access request may be subject to a fee to meet our costs in providing you with details of the information we hold about you and you may also need to pay fees separately to any third party data controller. If you wish to verify the details that we hold about you may do so by contacting us via e-mail to support@jobadder.com. Our security procedures mean that we may request proof of identity before we reveal information. This proof of identity will typically take the form of your e-mail address and any password submitted upon registration.

11 **Use of third party websites and Accessing Google data**

- 11.1 Our website/Service may contain links to and from the websites of our partner networks, advertisers and other third parties. If you follow a link to any of these websites, please note that they 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.
- 11.2 Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.
- 11.3 Notwithstanding anything else in this privacy policy, if you use the Service to access the following types of Google data, the use of that data will be subject to these additional restrictions:
- (a) The Service will only be used to read, write, modify or control Gmail message bodies (including attachments), metadata, headers, and settings to provide a web email client that allows users to compose, send, read and process emails and will not transfer this Gmail data to others unless doing so is necessary to provide and improve these

features, comply with applicable law, or as part of a merger, acquisition, or sale of assets.

- (b) The Service will not use this Gmail data for serving advertisements.
- (c) The Service will not allow humans to read this data unless we have your affirmative agreement for specific messages, doing so is necessary for security purposes such as investigating abuse, to comply with applicable law, or for the App's internal operations and even then only when the data have been aggregated and anonymized.

12 **Marketing**

- 12.1 We may from time to time provide you with an "opt in" or "opt-out" mechanism, subject to the requirements of applicable Australian privacy laws or the GDPR. An "opt-in" mechanism will provide you the opportunity to positively indicate that you would like or do not object to our sending you such further communications and we will not send you any unless you have "opted-in". An "opt-out" mechanism will provide you the opportunity to indicate that you do not want us to send you such further communications, and if you "opt-out" we will not send you any.
- 12.2 In each instance, opting-in or opting-out will be up to you and, in addition, if you do not want us to use your personal data for a particular purpose or disclose it to a third party, you may "opt out" at any time by contacting us as provided below. Please note, by opting-out, you may not be able to participate in certain activities on our website/Service.
- 12.3 Specific opt-outs may also be provided at the point of collection or along with the communications to you.

13 **Privacy complaints**

- 13.1 If you believe that we have breached any applicable privacy laws, or you wish to make a complaint about the way we have handled your personal data, we encourage you to contact us via e-mail to support@jobadder.com. We will respond within a reasonable period of receiving your complaint.

14 **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or by a notice displayed on the homepage of our

website/Service. Please check back frequently to see any updates or changes to our privacy policy.

15 **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to support@jobadder.com.

Addendum: Relevant to ANZ customers only

Statement on JobAdder and SEEK data-sharing

Excepting cases where a customer has **explicitly chosen** to set up an integration between JobAdder and SEEK (such as the imminent SEEK/JobAdder 2-way talent integration) or **explicitly instructed** a transfer of data between the parties then:

JobAdder does not, and will not, share candidate data or any customer-specific commercial data with SEEK, and nor does SEEK request such data from JobAdder.

For example:

- JobAdder does not send data on our individual customers, and their activity, to SEEK.
- We do **not** share sales activity, job-posting activity, invoicing, placement volumes or any other related data.
- JobAdder does not send candidate data or personally identifiable information to SEEK.

At times JobAdder would consider sharing with SEEK aggregated data regarding overall trends (e.g. Job Board usage across Australia). As part of any data sharing on market trends we would never expose customer specific behaviours, choices or information. Our obligation to our customers' data privacy is paramount.

In summary:

JobAdder reports to a distinct board of directors, **not** into the commercial and product management structures of SEEK. JobAdder operates in relation to SEEK with a strict separation of data and the same governance of data-sharing as would occur for any other technical & commercial partner.

JobAdder and SEEK take seriously their legal and ethical obligations regarding the sharing of data, and we hope this statement assures you that these obligations play out practically in a way that protects our customers and treats their candidate and commercial data appropriately.

If you have further questions please direct them to this dedicated email address:

dataprivacy@jobadder.com