

# GradScan customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

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- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- <u>Sharing information outside the UK</u>
- How to complain

# Contact details

Email

ethan@gradscan.com

#### What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- Occupation
- Date of birth
- Usage data (including information about how you interact with and use our website, products and services)
- Employment details (including salary, sick pay and length of service)



- Health information (such as medical records or health conditions)
- Website user information
- Any other information included in user-uploaded CVs, which does not fall under one of the following categories: age disability gender reassignment marriage or civil partnership pregnancy and maternity religion or belief sex sexual orientation personal address personal dates of birth personal contact information political opinions religious or philosophical beliefs trade union membership genetic data biometric data (where used for identification purposes) health data concerning a person's sex life

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Addresses
- Account information, including registration details
- Information used for security purposes
- Technical data, including information about browser and operating systems
- Any other information included in user-uploaded CVs, which does not fall under one of the following categories: age disability gender reassignment marriage or civil partnership pregnancy and maternity religion or belief sex sexual orientation personal address personal dates of birth personal contact information political opinions religious or philosophical beliefs trade union membership genetic data biometric data (where used for identification purposes) health data concerning a person's sex life

We collect or use the following personal information for **recruitment purposes**:

 Contact details (eg name, address, telephone number or personal email address)



- Date of birth
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Security clearance details (eg basic checks and higher security clearance)
- Any other information included in user-uploaded CVs, which does not fall under one of the following categories: age disability gender reassignment marriage or civil partnership pregnancy and maternity religion or belief sex sexual orientation personal address personal dates of birth personal contact information political opinions religious or philosophical beliefs trade union membership genetic data biometric data (where used for identification purposes) health data concerning a person's sex life

# Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

• Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right here.

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- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here.
- Your right to erasure You have the right to ask us to delete your personal information. You can read more about this right here.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information. You can read more about this right here.
- Your right to object to processing You have the right to object to the processing of your personal data. You can read more about this right here.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right here.
- Your right to withdraw consent When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right here.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - GradScan aims to achieve the following: 1. Improved efficiency and ease when searching for graduates to fill juniorlevel positions in companies. 2. Improved efficiency and ease of finding jobs for graduates, which is especially in need due



to the current state of the graduate job market. 3. Enablement of fairer, more granular filtration of candidates, due to the context-rich nature of unstructured data, when compared to the heavily categorized and specific nature of the data used in current application systems. • The processing is required to achieve benefits for graduates, recruiters, and society. • No excessive processing or data gathering will be performed. • Users will have the processing explained to them during signup. • Users will need to give explicit consent prior to using the system. Due to these factors the processing intended to be performed is a legitimate interest to all involved parties.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - GradScan aims to achieve the following: 1. Improved efficiency and ease when searching for graduates to fill juniorlevel positions in companies. 2. Improved efficiency and ease of finding jobs for graduates, which is especially in need due to the current state of the graduate job market. 3. Enablement of fairer, more granular filtration of candidates, due to the context-rich nature of unstructured data, when compared to the heavily categorized and specific nature of the data used in current application systems. • The processing is required to achieve benefits for graduates, recruiters, and society. • No excessive processing or data gathering will be performed. • Users will have the processing explained to them during signup. • Users will need to give explicit consent prior to using the system. Due to these factors the processing intended to be performed is a legitimate interest to all involved parties.



Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Legitimate interests we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - GradScan aims to achieve the following: 1. Improved efficiency and ease when searching for graduates to fill juniorlevel positions in companies. 2. Improved efficiency and ease of finding jobs for graduates, which is especially in need due to the current state of the graduate job market. 3. Enablement of fairer, more granular filtration of candidates, due to the context-rich nature of unstructured data, when compared to the heavily categorized and specific nature of the data used in current application systems. • The processing is required to achieve benefits for graduates, recruiters, and society. • No excessive processing or data gathering will be performed. • Users will have the processing explained to them during signup. • Users will need to give explicit consent prior to using the system. Due to these factors the processing intended to be performed is a legitimate interest to all involved parties.

# Where we get personal information from

• Directly from you

#### How long we keep information

Data will be retained from graduates who have signed up to the website until either of the following occurs:

1. A graduate opts to delete their account, which is possible at all times from the 'profile' page.



2. A graduate is inactive on the site for longer than three months and one week.

# Who we share information with

Data processors

#### Microsoft

This data processor does the following activities for us: Enables processing of CV data by LLM

Others we share personal information with

- Professional consultants
- Third parties:
  - $\circ\,$  Recruiters and Employers will use the site to find graduates to fill vacant positions.

# Sharing information outside the UK

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

#### Organisation name: Microsoft

Category of recipient: Data processor

Country the personal information is sent to: Sweden

**How the transfer complies with UK data protection law:** The country or sector has a UK data bridge (also known as Adequacy Regulations)



# How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

### Last updated

23 December 2024