

FreeHour Careers Month CV Collection Privacy Policy As of 20th February 2021

1. INTRODUCTION

This privacy notice provides you with details of how we collect and process your personal data through your use of our app (FreeHour - Student App), including any information you may provide when uploading your CV to Google Forms for submission to third party companies.

By providing us with your data, you warrant to us that you are over 16 years of age.

FreeHour Malta is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

If you have any questions about this privacy notice, please contact

Full name of legal entity: FreeHour Limited

Full name of legal contact person: Zach Ciappara

Mailing address: 10 Triq Ic-Citru, Attard

Email address: hello@freehour.eu

2. WHAT DATA DO WE COLLECT ABOUT YOU?

Personal data means any information capable of identifying an individual. It does not include anonymized data.

We may process certain types of personal data about you as follows:

- **Identity Data** may include your first name, maiden name, last name, username, marital status, title, date of birth and gender.
- **Contact Data** may include your billing address, delivery address, email address and telephone numbers.
- **Employment History Data** may include your history of employment, courses, internships & other work related information.
- **Result Data** may include information about certain results or grades achieved in previous years for different schools or courses.
- **Marketing and Communications Data** may include your preferences in receiving marketing communications from us and our third parties and your communication preferences

Sensitive Data

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and

genetic and biometric data. We do not collect any information about criminal convictions and offenses.

3. HOW WE COLLECT YOUR PERSONAL DATA

We collect data about you through a variety of different methods including:

- **Direct interactions:** You may provide data by filling in forms on our app (or otherwise) or by communicating with us by mail, phone, email or otherwise, including when you:
 - create an account on our app
 - subscribe to our service or publications;
 - request resources or marketing be sent to you;
 - enter a competition, giveaway, promotion or survey; or
 - give us feedback.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Sharing your CV & other information to the third party recipient you have agreed to in the specific data collection form. Ex. Deloitte
- Where we need to perform the contract between us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Purposes for processing your personal data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

Please email us at hello@freehour.eu you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

PURPOSE: To review your job submission & view the CV information, required for applying to any job.

TYPE OF DATA: Identity, Contact, Employment History, Result, Profile, Usage, Marketing and Communications, Technical

LAWFUL BASIS FOR PROCESSING: Sharing to the disclosed third party client recipient of which has been given specific content by the user to review the CV submission.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us at hello@freehour.eu.

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set above:

- The respective companies whom the user is specifically consenting to sharing the CVs & other information with for the purpose of hiring & job seeking.
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Authorities who require reporting of processing activities in certain circumstances.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS We do not transfer your personal data outside the Maltese Islands

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

We will only retain your personal data for 30 day. This will allow us enough time to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see below for further information.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you may have rights under data protection laws in relation to your personal data. These may include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our app or website, we encourage you to read the privacy notice of every website you visit.

We may disclose personal information to the following types of third parties for the purposes described in this policy:

- (1) **CV Collecting Brands.** In the case of CV collection, we may share your information with the third party recruiters, of which specific consent is given to share the information with the respective brand for recruitment purposes only. For example, if the user uploads a CV to our Google Forms system, this will be then shared with ONLY the respective client that was given specific consent.

These third party Service Providers enter into a contract that requires them to use your Personal Information only for the provision of services to us and in a manner that is consistent with this policy.

13. EMAIL POLICIES

If you choose to correspond with us through email, we may retain the content of your email messages together with your email address and our responses. We provide the same protections for these electronic communications that we employ in the maintenance of information received online, mail and telephone. This also applies when you register for our website, sign up through any of our forms using your email address or make a purchase on this site.

We are committed to keeping your e-mail address confidential. We do not sell, rent, or lease our subscription lists to third parties, and we will not provide your personal information to any third party individual, government agency, or company at any time unless strictly compelled to do so by law.

Email is not recognized as a secure medium of communication. For this reason, we request that you do not send private information to us by email. However, doing so is allowed, but at your own risk. Some of the information you may enter on our website will be transmitted securely via a secure medium known as Secure Sockets Layer, or SSL. Credit Card information and other sensitive information is never transmitted via email.

Choice/Opt-Out

Our site provides users the opportunity to opt-out of receiving communications from us and our partners by reading the unsubscribe link located at the bottom of any e-mail they receive from us at any time.

Users who no longer wish to receive our newsletter or promotional materials may opt-out of receiving these communications by clicking on the unsubscribe link in the e-mail.

14. DISCLAIMER AND LIMITATION OF LIABILITY

FreeHour Limited makes no representations, warranties, or assurances as to the accuracy, currency or completeness of the content contain on this website or any sites linked to this site or app.

All the materials on this site are provided 'as is' without any express or implied warranty of any kind, including warranties of merchantability, noninfringement of intellectual property or fitness for any particular purpose. In no event shall FreeHour Limited or its agents or associates be liable for any damages whatsoever (including, without limitation, damages

for loss of profits, business interruption, loss of information, injury or death) arising out of the use of or inability to use the materials, even if FreeHour Limited has been advised of the possibility of such loss or damages.

15. POLICY CHANGES

We reserve the right to amend this privacy policy at any time with or without notice. However, please be assured that if the privacy policy changes in the future, we will not use the personal information you have submitted to us under this privacy policy in a manner that is materially inconsistent with this privacy policy, without your prior consent. We are committed to conducting our business in accordance with these principles in order to ensure that the confidentiality of personal information is protected and maintained.

SEE ALSO

Our Terms and Conditions: <https://www.freehour.eu/privacy-policy>

If you have any questions about this privacy notice, please contact:

Full name of legal entity: FreeHour Limited
Full name of legal contact person: Zach Ciappara
Mailing address: 10 Triq Ic-Citru Attard, Malta
Email address: hello@freehour.eu