



VARSITY CAREERS HUB PRIVACY POLICY

Varsity Careers Hub is committed to protecting and respecting your privacy.

SCOPE OF POLICY

This policy (together with our Terms of Use) (<http://varsitycareershub.co.uk/terms-and-conditions.pdf>) applies to your use of our website, www.Varsitycareershub.co.uk, (collectively, the “Varsity Careers Hub Platforms”), and any of the services accessible through the Varsity Careers Hub Platforms, (“Services”).

This policy sets out the basis on which any personal data 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.

For the purposes of applicable data protection laws (including the EU General Data Protection Regulation 2016/679 – “GDPR”) (“**Data Protection Laws**”), the data controller is Varsity Careers HubHub. The third-party employers that we provide your data to may also be data controllers for the purpose of the Data Protection Laws and at that stage use of your personal data will be governed by the privacy policy of the individual third party employer.

Information we may collect from you

We may collect and process the following data about you:

- **Information you give us (Submitted Information):** you may give us information about you by filling in forms on the Varsity Careers Hub Platforms,



or by corresponding with us (for example, by email or chat). This includes information you provide when you register to use our site subscribe to any of our Services and when you report a problem with the site. The information you give us may include:

- Name
- Address (including postcode)
- E-mail address
- Phone number
- Nationality
- Gender
- Ethnicity
- Date of birth
- Preferred work location
- Education Stage
- Degree subject studied
- Education stage and timing
- Your username and password
- Your CV/ Resume file
- **Information we collect about you and your device:** Each time you use the Varsity Careers Hub Platforms we may automatically collect the following information:
 - Details of your use of the Varsity Careers Hub Platforms including, but not limited to, traffic data and location data, (Log Information).
- If you contact us, we may keep a record of that correspondence.



- **Uses made of the information:** We use the information held about you in the following ways:
- We may offer you the opportunity to have any application auto-populated using the information provided by you. We may engage a third party to provide this service and you acknowledge and consent to such third party accessing your data solely for the purposes of auto-populating application forms.
- We will use Device Information and Log Information for our understanding of how you use the Varsity Careers Hub Platforms, to ensure that it is optimised for your use and that we are targeting the right users.

We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this policy for as long as it is combined. Other than to employers who are advertising roles via the Varsity Careers Hub Platforms, we do not disclose information about identifiable individuals to other third parties, but we may provide them with anonymous aggregate information about our users (for example, we may inform them that 50 men have used the Varsity Careers Hub Platforms on any given day). We may make use of the personal data we have collected from you to enable us to comply with our third parties' wishes by displaying their information to that target audience.

Why we collect your personal data

Your personal data is collected primarily so that you can effectively use the Varsity Careers Hub Platforms and the associated Services. In using the Varsity Careers Hub



Platforms you may be required to provide your explicit consent to the following use of your personal data:

- The provision of your personal data, (which may include some or all of the Submitted Information and/or your contact details), to third party employers who are advertising job roles via the Varsity Careers Hub Platforms.
- To aggregate your personal data with others personal data into a non – identifiable form in order to carry our analysis of our users for internal business purposes.

Disclosure of your information

We may disclose some or all the Submitted Information and/or your contact details that we collect from you when you register or use the Varsity Careers Hub Platforms to the third-party employers, to allow them to contact you directly in respect of job opportunities.

We may disclose your Submitted Information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Varsity Careers Hub or substantially all of its assets are acquired by a third party, in which case personal data held by it about its users 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 or regulatory obligations or requests.
- In order to:



- Enforce or apply our Terms of Use and other agreements or to investigate potential breaches; or
- Protect the rights, property or safety of Varsity Careers Hub, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Varsity Careers Hub offers different services to different third party employers and as a consequence, the type of personal information we share about you with such third party employers will differ, depending on our contractual arrangements. There are 3 levels of disclosure with third party employers:

1. We may share all or some of your Submitted Information with the third party employer;
2. We may share your contact details with the third party employer; or
3. We may not share any personal information with the third party employer and instead may send you a push notification (or other digital communication) to allow you to submit an application or correspond with the third party employer directly through their website, app or other channel or environment (in which case any personal information you submit will be subject to the third party employer's privacy notices, policies and procedures).

Our contractual arrangements and the requirements of third party employers are changing all the time, and the nature of our service is for your benefit, to allow you to make the most of the Varsity Careers Hub Platforms. If you would like specific



information about which category of disclosure particular third party employers fall into, please contact us using the contact details below.

Where we store your personal data

The data that we collect from you is transferred to and stored at a destination within Europe. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of the Varsity Careers Hub Platforms, 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 the Varsity Careers Hub Platforms; 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.

We may collect and store personal data on your Device using application data caches and browser web storage (including HTML 5) and other technology. Certain Services may include social networking, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.



Your rights

In accordance with applicable Data Protection Laws, you have the right to access your personal data, the right to rectification, a right to restrict our processing activities of your data and a right of erasure. You have the right to ask us not to process your personal data for any marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You will be required to provide your consent to the processing of your Submitted Information by checking certain boxes in the Varsity Careers Hub Platforms. You can contact us at support@varsitycareershub.co.uk for further information.

The Varsity Careers Hub Platforms may, from time to time, contain links to and from the websites of our partner networks, third party employers, advertisers and affiliates (including, but not limited to, websites on which the Varsity Careers Hub Platforms or the Services are advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

Access to information

The applicable Data Protection Laws give you the right to access information held about you. Your right of access can be exercised in accordance with such Data Protection Laws. You will not have to pay a fee to access your personal data (or exercise any of



the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances. You can exercise the right at any time by contacting us at support@varsitycareershubs.co.uk.

Changes to 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 when you next start the Varsity Careers Hub Platforms including where we are required to obtain either revised or additional consent from you with regards to the collection, transfer and processing of your personal data. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the Varsity Careers Hub Platforms or the Services.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to support@varsitycareershubs.co.uk.

Varsity Careers Hub, January 2020