

Placer: Privacy Policy

We, **Placer Ltd**, a private limited company registered in England with company number 10803538 and having our registered address at Studio 10 Tiger House, Burton Street, London, England, WC1H 9BY (**we, us or our**), are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or about you from other sources (such as your learning provider, or employers you have completed a placement with), 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.

If you do not agree to your personal data being used in the manner described in this policy then please do not provide this to us. However, please note that some functionality of the App or the Services (each as described below) may be restricted/ unavailable where you do not provide us with any personal data we request.

SCOPE OF POLICY

This policy (together with our end-user licence agreement, as set out at <http://www.placer.co.uk/end-user-licence-agreement.pdf> (**EULA**), and any additional terms of use incorporated by reference into the EULA, together our website terms of use <http://www.placer.co.uk/terms-of-use.pdf> (**Terms of Use**) applies to your use of:

- The Placer mobile application software (**App**) once you have downloaded a copy of the App onto your mobile telephone or handheld device (**Device**) via an app store provider located at <https://play.google.com/store/apps> and <https://itunes.apple.com/gb/genre/ios/id36>; and
- Any of the services accessible through the App (**Services**) that are available via the App or other sites of ours (**Services Sites**), unless the EULA states that a separate privacy policy applies to a particular Service, in which case that privacy policy only applies.

INFORMATION WE COLLECT ABOUT YOU

1.1. We will collect and process the following data about you:

- **Information you give us (submitted information):**

This is information you give us about you by filling in forms on the App and the Services Sites (together, **Our Sites**), or by corresponding with us (for example, by e-mail or chat). It includes information you provide when you register to use the App, subscribe to any of our Services, search for the App or Service, share data via the App's social media functions and when you report a problem with the App or our Services. If you contact us, we will keep a record of that correspondence.

There are certain categories of information which we require in order that we can set up the App for you (including creating a profile for you), and to enable you to properly use the Services. These categories are:

- Name
- Course currently studying
- E-email address and phone number
- University student number
- Details of your academic achievements
- Education & training background (including university attended)
- Any personal statement you choose to provide
- Please note that we will also collect any feedback/comments/views you choose to provide, on the App, about employers you have completed work experience placements with via the App

Additionally, to improve your user experience when interacting with the App, you may choose to provide us with the following information (but you don't have to):

- LinkedIn link
- Website link
- Previous employment experience (including previous employer(s) and position(s) held)
- Previous work experience (including previous employer(s) and position(s) held)

- **Information we collect about you and your device:**

Each time you visit one of our Sites or use the App we will automatically collect the following information:

- technical information, including the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use and time zone setting;
- details of your use of any of our Apps or your visits to any of Our Sites and the resources that you access;
- We may also use GPS technology to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can enable or disable location services when you use our Service at any time through your mobile device settings.
- Information we receive from other sources. We may receive information about you if you use any of the Services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on Our Sites. We are also working closely with third parties (including, for example, business partners, subcontractors, delivery services, analytics providers, search information providers) and may receive information about you from them.

Please also be aware that we may collect information about you from employers that you engage with and for whom you may carry out work experience, including any feedback, views or opinions given by them about your performance during the work experience.

COOKIES

We use cookies to distinguish you from other users of the App or Service Site. This helps us to provide you with a good experience when you use the App or browse any of the sites and also allows us to improve the App and Our Sites. For detailed information on the cookies we use and the purposes for which we use them, see our cookie policy <http://www.placer.co.uk/cookies.pdf>.

USES MADE OF THE INFORMATION

We use the information held about you in the following ways:

- to create an individual profile for you in the App, which will allow you to (i) browse, shortlist and apply for placement and other work experience opportunities with employers, and (ii) provide feedback, views and opinions about employers you connect with via the App and carry out work experience for;
- to carry out our obligations arising from any contracts entered into between you and us (including this policy, the EULA, and the Terms of Use), and to provide you with the information, products and Services that you request from us;
- to notify you about changes to any of the Services;
- to ensure that content from Our Sites is presented in the most effective manner for you and for your computer or Device;
- to administer Our Sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve Our Sites to ensure that content is presented in the most effective manner for you and for your Device/computer;
- to allow you to participate in any interactive features of the App or Services, when you choose to do so;
- as part of our efforts to keep Our Site(s) safe and secure;
- to make suggestions and recommendations to you and other users of Our Sites about services that may interest you or them and
- for research purposes carried out internally or by trusted third parties.

DISCLOSURE OF YOUR INFORMATION

We may share the information held about you with selected third parties, including:

- Your **learning provider(s)** (university or college, for example): to provide them with updates and analysis regarding your use of the Services. Your learning providers will also be able to see: your profile on the App; which placements (if any) you have applied for; the progress of any placement applications you have made; the placements you have successfully secured; any feedback, views and opinions you choose to provide, via the App, about employers; and any feedback, views and

opinions which employers choose to provide, via the App, about you;

- **Employers** you have completed placements or other work experience opportunities with, who will have access to any feedback you provide about them on the App (and, therefore, any personal views you choose to share with us about those employers). Please also be aware that your profile on the App will be visible to all participating employers; and
- **Analytics** and **search engine providers** that assist us in the improvement and optimisation of Our Sites.

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006.

We may also disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Placer Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers 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 obligation or request.
- in order to:
 - enforce or apply the EULA, our Terms of Use and other agreements or to investigate potential breaches; or
 - protect the rights, property or safety of Placer Ltd our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

HOW LONG DO WE KEEP THE INFORMATION?

We will keep your information for a period of sixty (60) days following notification from you that you no longer wish to use the Services. Once this period expires, we will delete it.

WHAT ARE YOUR RIGHTS

You have a number of rights under data protection law in relation to the way we process your personal information.

Specifically, in relation to the personal data that we hold about you, you may have the right to: (a) access it ("subject access request"); (b) receive it in a structured commonly used and redeemable format ("data portability"); (c) require us to rectify it, if it is inaccurate; (d) require us to erase it in some instances; (d) require us to restrict our processing of it in some instances; (e) object to our processing of your personal information (including for the purposes of sending marketing materials to you); and (f) where we are relying on your consent to process your personal data (for example, in relation to marketing), you may withdraw your consent at any time.

You can find out more about these rights **here**, and you can exercise them by contacting: support@placer.co.uk

Our Data Protection Officer is David Barker. Please address any questions, comments and requests regarding our data processing practices to our Data Protection Officer in the first instance.

HOW WILL WE COMPLY WITH DATA PROTECTION LAWS?

Data protection laws require that we meet certain conditions before we are allowed to use your personal information in the manner described in this policy. We take our responsibilities under data protection laws very seriously, including meeting these conditions. To use your personal information, we will rely on the following conditions:

- **Providing the App:** We will process your personal information to the extent that this is necessary for the performance of our obligations under our EULA and Terms of Use; and
- **Legitimate Interests:** We will also process your personal information where this processing is in our "legitimate interests". It is in our legitimate interests to collect your personal information as it provides us with the information that we need to provide the App and Services to you more effectively, and to enable you to connect with prospective employers offering placement and work experience opportunities. When relying on this condition, we are required to carry out a balancing test of our interests in using your personal information (for example, in order to improve the App, or your user experience), against the interests you have as a citizen and the rights you have under data protection laws (for example, to not have your data sold to third party marketing companies without your knowledge, or store your personal data in insecure or unstable countries/ regions). The outcome of this balancing test will determine whether we can use your personal information in the ways described in this privacy policy. We will always act reasonably and give full and proper consideration to your interests in carrying out this balancing test.

- Consent: As detailed further above in this policy, we may choose to provide you with targeted marketing that we feel may be of interest to you. WHERE WE STORE YOUR PERSONAL DATA

All information you provide to us is stored on our secure servers held in the EEA European Economic Area (EEA) only. It will also be processed by staff operating within the EEA who work for us or for one of our suppliers. These staff may be engaged in the fulfilment of your request and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.

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

LINKING

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which the App 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.

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. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or the Services.

CONTACT

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

COMPLAINTS

If you have any concerns regarding our processing of your personal information, or are not satisfied with our handling of any request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office. Their address is:

**First Contact Team
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF**