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1. IMPORTANT INFORMATION AND WHO WE ARE

We respect your privacy and we want to be transparent with you about what personal data we collect and why. This policy (“**Privacy Policy**”) explains the personal data we collect from you, either directly or indirectly, and how we will use it. Personal data is any information that can be used to identify you or that we can link to you (“**Personal Data**”).

The Hastee group is made up of different companies. For the purpose of this Privacy Policy “Hastee” (“**we**”, “**us**”) refers to:

- **Hastee Technologies HR Ltd**, a company incorporated in England with company number 14155527 of registered office C/O Legalinx Lts. 3rd Floor, 207 Regent Street, London, W1B 3HH.
- **Hastee HR Ltd**, a company incorporated in England with company number 14152229 with the same registered office as Hastee Technologies HR Ltd; and
- **Hastee Europe, S.L.U.**, an entity duly incorporated, organised and in existence in accordance with the Laws of Spain, whose registered office is located at Plaza Pau Vila 1, Esc. A 2, 08039, Barcelona, Spain, registered with the Commercial Registry of Barcelona under Volume 46772, page 84, Sheet B-530387 and with Spanish tax ID number B67374504 (“**Typs**”).

This Privacy Policy is addressed to:

- Our suppliers and service providers who are natural persons (such as self-employed persons);
- The representatives or contact persons of our suppliers, partners, service providers and clients who are legal entities; and
- The representatives or contact persons of customers or prospective customers who are legal entities.

Hastee respects your privacy and is committed to protecting your personal data. It is important that you read this Privacy Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we process your personal data. It also explains your rights and our obligations when doing so. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

Please also use the Glossary to understand the meaning of some of the terms used in this Privacy Policy.

Controller

If you are a client, partner or supplier of services to us, the agreement between us will tell you which Haste company you have a primary relationship with and who is therefore the controller.

If you are a representative of a prospective client contacted by our sales team to establish if you might be interested in our services, the relevant controller will be HTL and, in the event you have been contacted by a member of our Spanish team, Typs as a joint controller of your Personal Data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

2. What information do we have about you?

This information may either be directly provided by you, or by the legal entity for whom you work (which could be one of our suppliers, business partners or clients), by third parties (e.g. organisations who provide business development services to us) or be obtained through trusted publicly available sources (such as LinkedIn, Companies House or the website of the organisation you work for).

Personal Data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect various types of personal data about you, including:

Identity Data includes first name, last name and your LinkedIn profile URL (if you have one).

Contact Data includes email address and telephone numbers.

Your Function includes your title, position, name of company.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Any other data you provide to us for example when you fill in forms or during events you attend, or when you answer questions during a conversation or in a survey;

We do not collect any **Special Categories of Personal Data** about you (this 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). Nor do we collect any information about criminal convictions and offences.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Interact with us about services we provide to your employer or that your employer provides to us;
 - express interest in our products or services on behalf of the entity who employs or engages you;
 - subscribe to our publications;
 - give us feedback or contact us.
- **Third parties.** We will receive personal data about you from various third parties as set out below:

- Organisations who provide business development services to us, who contact you to see if the legal entity you work for might be interested in our services;
- Business Partners or individuals who introduce you to us with a view to exploring whether the legal entity you work for might be interested in our services;
- **Publicly available sources.**
 - LinkedIn, Companies House or on the website of the organisation you work for.

4. Legal basis for processing

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- 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 perform the contract we are about to enter into or have entered into with you;
- Where we need to comply with a legal obligation; or
- We have obtained your prior consent.

More about the types of lawful basis that we will rely on to process your personal data is set out at the Glossary in section 10 below.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Please note that, when processing your personal data on the basis of 'legitimate interest', we always seek to maintain a balance between our legitimate interests and your privacy. Examples of such 'legitimate interests' are data processing activities performed:

- To develop a transparent and professional relationship with human resources and payroll professionals;
- To offer our products and services to your organization as a customer or potential customer;
- To prevent fraud or criminal activity, misuses of our services as well as the security of our IT systems, architecture and networks;
- To sell any part of our business or its assets or to enable the acquisition of all or part of another business or its assets by us; and

Note that 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 contact us if you need details about the specific legal ground we are relying on to process your personal data

5. Purposes for which we will use your personal data

We always process your personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose. In particular, we process your personal data for the following purposes:

- facilitate and enable our relationship with you as a prospective client;
- manage our relationship with you as an existing client;
- implement tasks in preparation of or to perform existing contracts;
- provide you with appropriate, adequate and updated information about our products and services;
- improve the quality of our interactions and services by adapting our offering to your specific needs;
- answer your requests and provide you with efficient support;

- send you surveys (e.g. to help us improve your future interactions with us);
- send you communications regarding products or services that we promote;
- make suggestions and recommendations to you about goods or services that may be of interest to your organization;
- manage, plan and execute communications and interactions with you (e.g. through the operation of our CRM database in which we keep records of interactions with you);
- track our activities (e.g. measuring interactions or sales, number of appointments/calls);
- invite you to events or promotional meetings sponsored by us (e.g. HR events, speaker events, conferences);
- fulfilling our compliance and reporting responsibilities (such as complying with our policies, local legal requirements and conducting audits);
- manage mergers and acquisitions involving our company;
- billing and invoicing; and
- any other purposes imposed by law and authorities.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or expressed interest in receiving services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by sending us an email to gdpr@hastee.com or by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service experience.

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 get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out at section 5 above “Purposes for which we will use your personal data”.

We will not sell, share, or otherwise transfer your personal data to third parties other than those indicated in this Privacy Policy.

We require all third-party service providers to respect the security of your personal data and to process it in accordance with data protection law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

RECIPIENTS	CATEGORIES OF PERSONAL DATA SHARED	REASON SHARED
Our personnel	Identity Data Contact Data Function Data	For the purposes set out in section 5.
Service Providers	Identity Data Contact Data Function Data	So that we may store this personal data on our CRM (client-relationship management) platform (for clients or prospective clients) or on our PRM (partnership relationship management) platform (for business partners and introducers). So that our IT service providers can provide support to you in the use of the client platform (if your employer is a client).
Business Partners	Identity Data Function Data	To our third-party business partners who offer business development services to us to facilitate and enable our relationship with you as a prospective client.
Professional advisers	Identity Data Contact Data Function Data	To our lawyers, bankers, consultants, auditors and providers of banking, legal, insurance and accountancy services if such disclosure is reasonably required to comply with any legal obligation; to enforce any contract entered into with you; to protect the rights, property or safety of Hastee or our customers (including by exchanging information with other organisations for the purposes of fraud protection).
Hastee Group Companies	Identity Data Contact Data Function Data	We may share your information with our corporate affiliates and associates (e.g., parent company, sister companies, associated trust entities, subsidiaries, joint ventures, or other companies under common control). We have a legitimate business interest to share data with our group as it allows us to better understand the performance of our services and how to offer and improve our product offerings across the group. It also assists us with finding operational efficiencies (such as financial efficiencies through sharing IT infrastructure), making use of group level software solutions and improving our technological offerings which form an integral part of our Service.

Purchaser of Hastee and/or any member of the Hastee Group	Identity Data Contact Data Function Data	Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy. We will also share information at the negotiation stage or in a bidding process, as applicable.
Any third party to whom we may assign or novate any of our rights or obligations	Identity Data Contact Data Function Data	Third parties to whom we may assign or novate any of our rights or obligations so that they may continue to perform them.
Law Enforcement Agencies	Identity Data Contact Data Function Data	On the basis of the compliance with a legal obligation for example if we are required to disclose information pursuant to regulatory, employment, taxation, criminal, terrorist financing and money laundering law requirements.
Legal, civil or business affairs	Identity Data Contact Data Function Data	We may disclose information when we believe disclosure is appropriate to comply with the law, to enforce or apply applicable terms and conditions and other agreements, or to protect our rights, property or safety or the rights, property or safety of our affiliates, users, or third parties. For example, we may disclose information in response to subpoenas, arbitration proceedings, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies.

7. International transfers

For the purposes of this section the following definitions apply:

European Data Protection Laws means any and all applicable laws relating to the processing of personal data and privacy applicable in the EEA, including applicable guidance and codes of practice issued by the European Commission or any other supervisory authority and including, to the extent applicable, the GDPR.

GDPR means Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and any legislation that amends, re-enacts, replaces or supplements it.

UK Data Protection Laws means any and all applicable laws relating to the processing of personal data and privacy applicable in the UK, including applicable guidance and codes of practice issued by the UK Information Commissioner or any other supervisory authority and including, to the extent applicable, the Data Protection Act 2018, the Regulation of Investigatory Powers Act 2000, the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2426/2003), any domestic data protection laws and any national legislation that amends, re-enacts, replaces or supplements the GDPR in the UK as a consequence of its withdrawal from the European Union.

The Personal Data that we obtain about you is stored on third party servers. We process such Personal Data on servers located both within the United Kingdom and outside the United Kingdom, in the European Economic Area. In connection with any transfers of your Personal Data, we endeavour to ensure that the entities or people to whom we provide Personal Data hold it subject to appropriate safeguards and controls. Whenever we transfer your Personal Data:

- i) out of the United Kingdom to countries that have not been deemed to provide an adequate level of protection for Personal Data by the United Kingdom, we will ensure a similar degree of protection is afforded to it by implementing the following safeguards:
 - Transfers of Personal Data will only take place where the organization receiving the Personal Data has provided us with adequate safeguards and subject to a written agreement, in line with the requirements of UK Data Protection Laws applicable to processors and Personal Data transfers. We will use specific contracts approved by the UK Government to give Personal Data the same protection as it has in the United Kingdom.
- ii) out of Europe to countries that have not been deemed to provide an adequate level of protection for Personal Data by the European Commission, we will ensure a similar degree of protection is afforded to it by implementing the following safeguards:
 - Transfers of Personal Data will only take place where the organization receiving the Personal Data has provided us with adequate safeguards and subject to a written agreement, in line with the requirements of European Data Protection Laws applicable to processors and Personal Data transfers. We use specific contracts approved by the European Commission, which give Personal Data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of Personal Data to third countries.

8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to your personal data to those employees and other staff who have a business need to have such access. 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.

9. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

For contracts, the retention period is the term of your company's contract with us, plus the period of time until the legal claims under this contract become time-barred, unless overriding legal or regulatory schedules require a longer or shorter retention period. When this period expires, your personal data is removed from our active systems.

Personal data collected and processed in the context of a dispute are deleted or archived (i) after a settlement has been reached, (ii) once a decision in last resort has been rendered or (iii) when the claim becomes time barred.

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 unauthorised 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, regulatory, tax, accounting or other requirements.

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

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. In order to exercise any of these rights, you can contact us by using the contact information provided at the end of this Privacy Policy.

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). You may request access to your Personal Data by contacting us using the contact information provided at the end of this Privacy Policy. If permitted, and required by law, we will grant you reasonable access to the data that we have about you. This enables you to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- (a) if you want us to establish the data’s accuracy;
- (b) where our use of the data is unlawful but you do not want us to erase it;
- (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; and/or
- (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

11. GLOSSARY

LAWFUL BASIS

- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests

are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

12. HOW TO EXERCISE YOUR RIGHTS

If you would like to exercise any of the rights described above, please contact us by emailing: gdpr@hastee.com.

We may need to request specific information from you to help us confirm your identity and verify 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 in the event you have made a number of requests, in which case, we will notify you and keep you updated.

If you feel that your complaint has not been adequately resolved, you have the right to make a complaint at any time to:

- the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). Please see <https://ico.org.uk/make-a-complaint/> for information on how to do this.
- In the EU, there are national and regional data protection authorities (a list is available on [this website](#)).

We would, however, appreciate the chance to deal with your concerns before you approach the relevant data protection authority so please contact us in the first instance.

13. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO NOTIFY US OF CHANGES

We may change this Privacy Policy and our information collection, use, and sharing practices over time. This version was last updated in March 2021. To the extent that our Privacy Policy changes in a material way, we will notify you of such changes in accordance with applicable data protection law requirements. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

14. HOW TO CONTACT US

You can contact us with any questions, comments and requests regarding this Privacy Policy or your personal data by emailing: gdpr@hastee.com

Our address is: **Hastee Technologies HR Ltd**, C/O Legalinx Ltd, 3rd Floor, 207 Regent Street, London, W1B 3HH.

HAstee Europe S.L.U., Plaza Pau Vila 1, Esc. A 2, 08039, Barcelona, Spain