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IMPORTANT INFORMATION AND WHO WE ARE

The Hastee Group, which includes Hastee Technologies HR Ltd and all affiliated companies respects your privacy and is committed to protecting your personal data. Hastee Technologies HR Ltd, a company incorporated in England with company number 14155527, of registered office C/O Legalinx Ltd. 3rd Floor, 207 Regent Street, London, W1B 3HH (“we”, “us”, or “Hastee”) is the controller and responsible for this website. This privacy policy will inform you about how we treat your personal data when you use our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. This policy does not apply to third-party websites, products or services.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Hastee collects and processes your personal data through your use of this website, including any data you may provide through this website when you take part in a competition or click on links such as:

- Try Us Out
- Register As A Company
- Support – Get In Touch
- Schedule A Demo
- Drop Us An Email
- Refer Your Employer

If you are a visitor to our website:

- i) who has registered an account on the Hastee App pursuant to contract for services between Hastee and your employer (“a **Registered User**”) – any personal data you provide through this website is dealt with under the [App Privacy Policy](#);

- ii) and are a client with whom Hastee has a contract for services (“**Client Contract**”), a separate data processing agreement, as contained in that Client Contract, applies to any information you provide through this website.

It also sets out the choices you can make about the Personal Data we collect and the legal rights you have in relation to your Personal Data.

This website is not intended for children and we do not knowingly collect data relating to children.

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 are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Hastee is the controller responsible for this website and personal data collected through it.

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.

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 website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

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).

When you use our website, we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data includes first name, last name, username or similar identifier. If you are a Registered User and you provided us with your payroll or employer ID when clicking on the “Request Invitation Code” link - our use of this personal data will be governed by the terms of our [App Privacy Policy](#).

Contact Data includes email address and telephone numbers.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

Profile Data includes your name and password (if you click on the link to “Sign Up as an Employer”), feedback and survey responses.

Usage Data includes information about how you use our website, products and services.

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

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

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 filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Express interest in our products or services;
 - subscribe to our publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below:
 - Technical Data from analytics providers such as Google based outside the EU.

4. How we use your personal data

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.

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.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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 where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To facilitate and enable our relationship with you as a prospective client or register your interest in your employer becoming a Hastee customer	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (for running our business and to communicate with you regarding service and updates)

		Performance of a contract with you
To manage our relationship with you as a user of our website which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

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.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).

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.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table at section 4 above "Purposes for which we will use your personal data".

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
Service Providers	Identity Data Contact Data Financial Data Employment Data	So that survey, hosting, analytics, search engine and other technical assistance providers can assist us in the improvement and optimisation of the Hastee website.

	<p>Transaction Data Device Data Aggregate Data Usage Data</p>	<p>Survey companies are only permitted to use your personal data to request a review from you in the context of your use of the Hastee website. They may not use it for any other purpose.</p> <p>Our IT service providers provide us with software development, business analyst and system administration services.</p>
Advertising and remarketing networks	<p>Technical Data Usage Data</p>	<p>Our website uses remarketing and conversion tracking technologies provided by Google AdWords (for further details about the Remarketing product we use, see here; for the product's privacy policy, see here) and Facebook Pixel (for further details about the Facebook product we use, see here).</p> <p>This technology allows us to display targeted advertising to users who have already visited our website when they use the websites of the partner networks of Google and Facebook across the internet. We may add similar providers to those mentioned here in the future. Third-party vendors, including Google and Facebook, use cookies to serve you ads based on your visits to our website. Please refer to our cookie policy for further information about how these technologies are used on our website.</p>
Communication Partners	<p>Contact Data</p>	<p>Our third-party partners provide live chat and facilitate communication (like email, chat and phone), in order to provide you with the full functionality of the Hastee website.</p> <p>They may ask for your name and email to provide assistance to you.</p>
Professional advisers	<p>Identity Data Contact Data Device Data Usage Data</p>	<p>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).</p>
Hastee Group Companies	<p>Identity Data Contact Data Employment Data Usage Data Device Data Aggregate Data Location Data Camera Data</p>	<p>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.</p>

Purchaser of Hastee and/or any member of the Hastee Group	Identity Data Contact Data Usage Data Device Data Aggregate 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.
Law Enforcement Agencies	Identity Data Contact Data Usage Data Device Data Aggregate 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 Usage Data Device Data Aggregate 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.

6. 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.

7. Data security

The transmission of information by the internet is not completely secure. Although we will endeavour to protect your personal data, we cannot guarantee the security of your data transmitted via the Hastee website; any transmission is at your own risk. Once we have received your information, we will use security features to try to prevent unauthorised access.

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.

8. 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.

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.

9. 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.

10. 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.

11. 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.

12. 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.

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