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## PRIVACY POLICY

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### BACKGROUND:

Aspectz Ltd understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, [www.aspectz.co.uk](http://www.aspectz.co.uk) (“Our Site”) and will only collect and use personal data in ways that are described here and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

<b>“Account”</b>	means an account required to access and/or use certain areas and features of Our Site;
<b>“Cookie”</b>	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;
<b>“Cookie Law”</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003
<b>“personal data”</b>	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”) and
<b>“We/Us/Our”</b>	means Aspectz a limited company registered in England under company number 3959991 whose registered address is 8 Old Forge Court, Colchester Road, Elmstead, Essex CO7 7EA and whose main trading address is via our contact form.

### 2. Information About Us

- 2.1 Our Site is operated by Aspectz Ltd [, a limited company registered in England under company number 3959991, whose registered address is 8 Old Forge Court, Colchester Road, Elmstead, Essex CO7 7EA and whose main trading address is Ribbons, Maypole Road, Tiptree, Colchester CO5 0EJ.
- 2.2 Our VAT number is 988092367
- 2.3 Our Data Protection Officer is Paula Howard and can be

contacted by email at [admin@aspectz.co.uk](mailto:admin@aspectz.co.uk) or by telephone on 01621817816 or by post at via our contact form

### 3. **What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

### 4. **Your Rights**

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

4.1.1 The right to be informed about Our collection and use of personal data;

4.1.2 The right of access to the personal data We hold about you (see section 12);

4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);

4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);

4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;

4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);

4.1.7 The right to object to Us using your personal data for particular purposes; and

4.1.8 Rights with respect to automated decision making and profiling.

4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

## 5. What Data Do We Collect?

Depending upon your use of Our Site, We may collect some or all of the following personal data (please also see section 13 on Our use of Cookies and similar technologies and Our Cookie Policy <https://www.aspectz.co.uk/cookie-policy/>):

- 5.1 Name;
- 5.2 business/company name;
- 5.3 job title;
- 5.4 profession;
- 5.5 employment history
- 5.6 education
- 5.7 details of contacts for references
- 5.8 contact information such as email addresses and telephone numbers;
- 5.9 demographic information such as post code, preferences and interests;

## 6. How Do We Use Your Data?

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. applying for one of our advertised vacancies), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
  - 6.2.1 Providing our clients with your career history and appropriate qualifications relevant to a vacancy you have applied for;
  - 6.2.2 Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);
  - 6.2.3 Personalising and tailoring Our services for you;
  - 6.2.4 Replying to emails from you;
  - 6.2.5 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by emailing Us at [admin@aspectz.co.uk](mailto:admin@aspectz.co.uk))
  - 6.2.6 Advising of addition vacancies / candidates of potential interest
- 6.3 You have the right to withdraw your consent to Us using your

personal data at any time, and to request that We delete it.

- 6.4 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

- 6.4.1 Candidates (12 months)

- 6.4.2 Clients (for as long as our business relationship is maintained)

## **7. How and Where Do We Store Your Data?**

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it

- 7.2 Your data will only be stored in the UK and under the GDPR

- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected

- 7.4 Steps We take to secure and protect your data include:

- 7.4.1 Password protection and encrypted backup

## **8. Do We Share Your Data?**

- 8.1 Subject to section 8.2, We will not share any of your data with any third parties for any purposes without your permission

- 8.2 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

- 8.3 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

## **9. What Happens If Our Business Changes Hands?**

- 9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

- 9.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

## 10. How Can You Control Your Data?

- 10.1 In addition to your rights under the GDPR, set out in section 4, when] you submit personal data, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls of Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by contacting us at [admin@aspectz.co.uk](mailto:admin@aspectz.co.uk)).
- 10.2 You may restrict Our use of Cookies. For more information, see section 13 and Our Cookie Policy <https://www.aspectz.co.uk/cookie-policy/>.

## 11. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at [admin@aspectz.co.uk](mailto:admin@aspectz.co.uk)

## 12. Our Use of Cookies

- 12.1 [Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- 12.2 All Cookies used by and on Our Site are used in accordance with current Cookie Law.
- 12.3 Before Cookies are placed on your computer or device, you will be shown a pop up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- 12.4 Our Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

- 12.5 The analytics service(s) used by Our Site use(s) Cookies to gather the required information.
- 12.6 The analytics service(s) used by Our Site use(s) the following Cookies:

**13. Google Cookie info**

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_ga	2 years	Used to distinguish users.
_gid	24 hours	Used to distinguish users.
_gat	1 minute	Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named _dc_gtm_<property-id>.

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__utma	2 years from set/update	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmt	10 minutes	Used to throttle request rate.
__utmb	30 mins from set/update	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.
__utmc	End of browser session	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to

		determine whether the user was in a new session/visit.
__utmz	6 months from set/update	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.
__utmv	2 years from set/update	Used to store visitor-level custom variable data. This cookie is created when a developer uses the <code>_setCustomVar</code> method with a visitor level custom variable. This cookie was also used for the deprecated <code>_setVar</code> method. The cookie is updated every time data is sent to Google Analytics.

<b>Name of Cookie</b>	<b>First / Third Party</b>	<b>Provider</b>	<b>Purpose</b>
wfCBLBypass	Third	Wordfence	Wordfence offers a feature for a site visitor to bypass country blocking by accessing a hidden URL. This cookie helps track who should be allowed to bypass country blocking.
__cfduid	Third	Cloudflare	The __cfduid cookie is used to identify individual clients behind a shared IP address and apply security settings on a per-client basis
catAccCookies	First	Cookies control	Remember your Cookie preferences.
PHPsession	First	PHP Session	Simple cookie for site operation

15.1 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

15.2 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

15.3 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

#### 15.4 **Contacting Us**

If you have any questions about Our Site, Our services or this Privacy Policy, please contact Us by email at [admin@aspectz.co.uk](mailto:admin@aspectz.co.uk) or by telephone on 01621817816. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

#### 16. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site

following the alterations. We recommend that you check this page regularly to keep up-to-date.