

Privacy Policy

1. Introduction

1.1 Contract

For the purpose of applicable data protection legislation (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (the “GDPR”), the data controller of your Personal Information (see 2.1 for definition) is ProPair Community Interest Company Limited of Beech House, School Lane, Crewe, CW3 0BA, UK (“ProPair”, “us”, “we”, or “our”). ProPair respects your privacy and have detailed here our Privacy Policy for your understanding of how we collect, use and disclose the Personal Information we receive from users in order to assist you in making informed decisions.

The Privacy Policy applies to all information we collect or receive from you when using ProPair.com (the “Site”), as well as the articles, videos and all other platform and service offerings (“services”) of ProPair Group Ltd (“ProPair”, “us”, “we”, or “our”).

When you sign up, set up a profile or use any of ProPair’s services and platform in any shape or form, you expressly and voluntarily agree to abide by our Privacy Policy herein as well as our [Terms of Use](#) and [Safeguarding Policy](#). You can change your profile on ProPair.com or close your account at any time.

You understand that ProPair’s services, product & platform are in Beta, still undergoing testing and do not represent a final product offering. As such, it may contain bugs, defects, errors and other problems and is provided “as is”. Any use thereof shall be at your own risk.

1.2 International Use

Here we detail the jurisdictions to which ProPair’s site, services and platforms are intended and where your information (including Personal Information) will be transferred, processed and stored.

ProPair’s site, services and platforms are controlled and operated from the UK and are not intended for use under the laws or jurisdictions of any state, country or territory other than the UK (other than as required to facilitate mentoring matches in the United States of America, Canada, Australia & New Zealand). If you choose to use our site, services, platform in any shape or form, including consenting to this Privacy Policy you are solely responsible for compliance with all applicable local laws, rules and regulations and you

acknowledge that your information (including Personal Information) will be transferred, processed and stored in the UK and/or European Economic Area ("EEA").

The UK and/or EEA may provide a different level of data security than in your country of residence, and you waive any claims that may arise under your own national laws. We may also limit ProPair's site, services and platform availability, in whole or in part, to any person, geographic area or jurisdiction we choose, at any time and in our sole discretion.

1.3 Students & Children

All users of ProPair's services and platform must be the "Minimum Required Age" (please see below).

"Minimum Required Age" means 13 years old. However, if law requires that a user must be older in order for ProPair to lawfully provide its services to them and platform for their use without parental consent (including using of their Personal Information) then the "Minimum Required Age" is such older age.

If you think your or another child under the "Minimum Required Age" has registered with ProPair then you can delete their account immediately and/or contact ProPair on our contact form below to help us ensure their details are removed from our systems.

For any questions on this please contact a member of our team (hello@propair.me).

1.4 Changes

Our Privacy Policy is a "living" document set as of 18/01/2021 and subject to refinement and expansion in the future. Please check back regularly. If any material changes are made there will be an announcement to all users, and by continuing to post, message and in any way make use of our Site and services after this announcement has been made you expressly confirm acceptance.

1.5 Questions

If you have any questions about how your Personal Information is used or for any other reason please contact us via email (hello@propair.me).

2. Information Collection

Here we explain how and what information we collect and for what purpose we do so.

When using our Site, platform and services, we may ask you to provide us with “Personal Information” you knowingly choose to disclose and that is collected on an individual basis. As well as this website and service use information is collected on an aggregate basis (for example, we may collect data such as 100 users under 25 years old have used a certain feature in a certain time frame) as you and others browse and utilize our Site, platform and services for product development purposes.

2.1 Personal Information

Personal Information means any information which identifies you as an individual. It may include your name, but it may also be other information such as your age, school, company, date of birth, nationality, contacts details including email address and phone number, race, gender or IP Address which combined identify you.

The Personal Information that you provide to us may reveal or allow others to identify aspects of your life that are not expressly stated on your profile.

2.2 How and What Information we Collect

Here we detail the ways that we collect your Personal Information and what information we might collect.

(i.) Personal & Registration Information – Of which you choose to provide

You will provide us information about yourself, your school or company, and your practices when you use any of our products and services or register for email newsletters and alerts.

When you upload or refer your contacts you also give us access to your contact information and friend/colleague lists.

(ii.) Interview & Calls

For prospective Advisors, we may conduct telephone and video interviews and may record these interviews for internal use and for training or product development purposes.

(iii.) Message Exchanges, ProPair Support Messaging & Surveys

We continuously monitor all engagement & conversation for safeguarding purposes and product development. As such we may retain messages on record for a reasonable period of time to maintain our Terms of Use & Safeguarding Policy, for training purposes and for aggregate trend & data analysis.

If you choose to correspond with us through email, contact form and our surveys we may retain the content of your messages/answers together with your email address and our responses for training, product development and on an aggregate anonymous basis for relevant commercial purposes.

(iv.) Log Data & Website Use Information

Like many commercial websites, we collect information about how this site is used and we reserve the right to collect, use and disclose any non-Personal Information with our advertisers/ad-serving companies and other third parties at our own discretion.

Information gathered is through "Cookies" and web server logs and this may include data such as the date and time of visits, the pages viewed and other statistics. We and our advertisers/ad-serving companies may use third-party services such as Google Analytics or pieces of code to monitor this.

Please see section "3. Cookies" in this policy for more information about Cookies and our use of them.

(v.) Social Media

There may be social media features/widgets on our Site and services, such as "Like" and "Share" opportunities to other websites/platforms. These features/widgets may collect information about users such as the URL of the page on our Site to which you are visiting. They are governed by the privacy policy of third parties and as such, we recommend you review their policy and terms before use.

(vi.) Educational Institution Partners & Users

Our education institution partners & users may sign up to use us as an educational tool and as such may provide us with Personal Information and data on their students for this purpose and/or to enable participation.

(vii.) Corporate/Charity Institution Partners & Users

Our corporate and charity institution partners & users may sign up to use us as an volunteering facilitation tool and as such may provide us with Personal Information and data on their Advisors for this purpose and/or to enable participation.

2.3 Personal Information Use

Here we explain how we use and who we share your Personal Information with.

ProPair will process your Personal Information for purposes connected with (1) the success and development of our services (including but not limited to analysing aggregate trends and data), (2) to provide a safe and comfortable community for all of our users, (3) any general & relevant job or user career records, (4) to offer you a personalised and relevant experience, (5) for communication purposes, (6) to optimise and monitor the use of our websites & platforms, (7) to comply with applicable legal requirements and (8) for any other legitimate reasons.

We protect your personal information and will only provide it to third parties: (1) with your consent; (2) where it is necessary to carry out your instructions (e.g. to apply for job opportunities and participation in learning programs that our sponsored by our business partners); (3) as reasonably necessary in order to provide our features and functionality to you; (4) when we reasonably believe it is required by law, subpoena or other legal process; or (5) as necessary to enforce our Terms of Use & Safeguarding Policy or protect the rights, property, or safety of ProPair, our users and visitors, and the public.

(i.) Safeguarding – Background Checks & Monitoring

As mentioned in section 2.3 above, we reserve the right to monitor and keep on record for a reasonable amount of time, all engagement and private messaging for safeguarding purposes.

Further to this and for the purpose of maintaining a safe & secure environment for all users, you authorize ProPair to utilise third parties to use your Personal Information to continuously and periodically perform background checks on you when you sign up to ProPair's services and platform.

(ii.) Sharing with Affiliates, Third Parties & Other Users

Recruiters & Business Opportunities: Where you explicitly consent, your personal information may be used to allow recruiters and business opportunities find you and this enables us to serve you ads and other relevant content on and off of our services.

To opt out of receiving notifications please update your preferences, contact a member of the ProPair team or click the unsubscribe link at the bottom of each email.

Similarly, where you explicitly apply for a recruitment or business opportunity, we shall provide the company/institution with relevant profile and data to allow them to make an informed decision.

Educational Institutions: If you are a student, your school, college or university may partner with or sign up for a ProPair service package to use us as an educational tool. As part of this arrangement, we collaborate and share some of your Personal Information (including your progress and usage) to provide our services to them for educational/careers guidance purposes, offer personal recommendations, as well as to advance the impact of our services.

The Personal Information shared is therefore for learning analytics purposes and for the legitimate interests of each student and the educational institution to which they are a member.

If you are an Advisor engaging with a student who belongs to a school, college or university who is a partner with or signed up for a ProPair service package, as part of this arrangement we might share your Personal Information (such as your name, role, ProPair approval status, etc.) for user safeguarding and legitimate interests of each student and the educational institution to which they are a member.

Aggregate Trends & Analysis: When you sign up to our platform and services you agree that we can use your Personal Information on an anonymous basis for analysis alongside other users and on an aggregate basis (e.g. general trends in the job and careers market). Furthermore, you provide consent for us to share this aggregate trend & data analysis with affiliates, third parties, other users and for ProPair to utilize it within our research, product development and other commercial purposes we choose to.

Business Operation: We may use third parties to facilitate our business, such as sending email and processing payments and in connection with these operations; these third parties may have access to your personal information for use in connection with those activities.

Public Conversations: If you participate in a conversation and share content in public forums, you should be aware that any information you choose to disclose using these services can be read, collected, and used by other members in these forums and other third parties, including advertisers. We are not responsible for the information you choose to submit in these forums. Your group contributions are typically searchable on our services and some content in groups may be public and searchable on the internet if the group owner

has not closed the group for public discussions. Please make yourself aware of the public/private nature of each forum before you use them.

(iii.) Matching & Connecting with Other Users

We use your Personal Information to match you with a suitable set of students / Advisors and when you connect you will be able to view and search each other's connections and profile. Note, this may include sharing such information outside of your home territory e.g. the UK (depending on where your match is based), and you agree (as the receiver of any such a data transfer) to protect the individuals' rights and freedoms for their Personal Information.

We will use your conversations, connections and progress to suggest new matches and connections for you.

You can opt out or put on hold any such automated suggestions, being able to re-activate them at any time.

(iv.) As Required by Law

ProPair may disclose and share your information in order to investigate, prevent, or take action regarding illegal activities, potential threats to the physical safety of any user, violations of our Terms of Use & Safeguarding Policy or this Privacy Policy, protect and defend our rights & property (including affiliated parties), or as otherwise required by law.

(v.) Business Development

With business development, there is the possibility that we buy or sell assets/service offerings. Customer, user and visitor information may be one of the transferred business assets. This may also be the case in the course of corporate divestitures, mergers, or any dissolution. You will be informed of any such activity, use of your information and your choices regarding the information.

3. Cookies

"Cookies" are files with small amount of data, which may include an anonymous unique identifier of each user. Cookies are sent to your browser from a website and stored on part of your computer hard drive. Like many sites, we may use cookies to collect information.

ProPair uses persistent and session cookies. Persistent cookies are used to recognise you as an existing and returning user to our Site, whereas session cookies are temporary and not retained after you have closed our Site in your browser.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, your experience using ProPair's Services may not be optimum and/or you may not be able to use some portions of our Site.

We may use Cookies to:

- Prevent you from seeing unnecessary advertisements/notices and tailor any advertisements to each user
- Authentication, to avoid you logging in more than is necessary for security and recognize you when you return to our Site
- Calculate the aggregate number of people visiting our Site and which parts are most popular, of which enables us to improve it for our users
- Customize each user experience to match their preferences with relevant/appropriate features and services

If you would like to find out more about Cookies, including how to see what cookies have been set and how to manage and delete them, please visit www.allaboutcookies.org, or www.aboutcookies.org.

Browsers also provide their own Cookie help guides. For your ease of reference, we have provided the relevant links to some of the most used browsers below.

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari](#)

4. Security

Here we detail our security measures to ensure your data is kept safe, when & how your data is disposed of and how you can access or edit your Personal Information.

4.1 Security and Location of your Personal Information

Data and Personal Information collected from you will be stored at a destination within the UK and/or European Economic Area ("EEA") and by submitting, posting, sharing your Personal Information, you acknowledge that this transfer, storing or processing will take place. If we do send your Personal Information outside of the UK and/or EEA, we will ensure that adequate safeguards are put in place to protect your Personal Information.

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security and any transmission of data and Personal Information over the internet is done so at your own risk.

4.2 Personal Information Post Use of ProPair Services

After you leave ProPair (i.e. close your accounts), ProPair, its affiliated companies and service providers reserve the right to retain certain information of yours for business purposes permitted by law (including for child safeguarding purposes) and in a safe and secure manner for a commercial period of time. This will typically be at least until the student/Mentee becomes 18 years of age, however, if law requires a person to be older than 18 years of age to be considered an adult then this information will be held until the student/Mentee reaches this older age. ProPair may also retain your Personal Information after you have closed your account if necessary to comply with legal obligations, maintain security or any other reasonable purpose.

Any information or content shared with other users remain visible and we do not control how other users utilize this out of our services.

4.3 Disposal of Your Personal Information

We will only keep your Personal Information for the period of time required to fulfil the purposes for which we process your details, unless we are permitted or required by law to keep it for a longer period of time.

Where your information is no longer required (for example we no longer need it for safeguarding purposes), we ensure it is disposed of within a reasonable timeframe (within 6 months) and in a secure manner.

You may also request ProPair dispose of your Personal Information directly and we shall do our best to fulfil your requests, however, we may be obligated by law, safety protocol or as a service provider to your employer/charity you volunteer on behalf of, school, college or university to retain certain data about you.

Generally, we will delete your Personal Information as soon as possible after you request to delete your account and it is no longer necessary for us to provide you with any information or services you have requested, unless:

- We are required to retain it as proof that we comply with the legislation in force (e.g. recordings of consent to our Terms of Use, Privacy Policy, and other similar consents are retained for five years), or for any other legal obligations to which we are subject;
- We are required, due to an unresolved issue, claim, appeal or dispute or applicable law, to retain relevant information until the matter has been resolved;
- If the data must be retained per our legitimate commercial interests (where the legitimate interest is not overridden by your data protection & privacy interests), for example in order to prevent fraud and improve users' safety and security. For example, we may be required to retain data in order to prevent a user who has been banned from opening a new account due to their illegal or dangerous conduct or a security incident; or If the users request us to delete their Personal Information.

4.4 Linked Websites

We are not responsible for the practices employed by websites linked to or from our site nor the information or content contained therein. Often, links to other websites are provided solely as pointers to information on topics that may be useful to the users of our site. Please be aware that when you use a link to go from our Site to another website, our Privacy Policy is no longer in effect and is then subject to that website's own rules and policies. Please read over those rules and policies before proceeding.

5. Your Rights

5.1 Access to your information

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email us at hello@propair.me. If we provide you with access to the information we hold about you, we will not charge you for this unless permitted by law. If you request further copies of this information from us, we may charge you a reasonable administrative cost. Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will always tell you the reasons for doing so.

5.2 Right to object

This right enables you to object to us processing your Personal Information where we do so for one of the following reasons:

- because it is in our legitimate interests to do so (for further information please see below);
- to enable us to perform a task in the public interest or exercise official authority;
- to send you direct marketing materials; or
- for scientific, historical, research, or statistical purposes.

5.3 Right to withdraw consent

Where we have obtained your consent to process your Personal Information for certain activities, you may withdraw this consent at any time and we will cease to use your data for that purpose unless we consider that there is an alternative legal basis or **legitimate commercial interest** (where the legitimate interest is not overridden by your data protection & privacy interests) to justify our continued processing of your data for this purpose, in which case we will inform you of this condition.

5.4 Right to erasure

You have the right to request that we “erase” your Personal Information in certain circumstances. Normally, this right exists where:

- the data are no longer necessary;
- you have withdrawn your consent to us using your data, and there is no other valid reason for us to continue;
- the data has been processed unlawfully;
- it is necessary for the data to be erased in order for us to comply with our obligations under law; or
- you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

In the unlikely event that we refuse to comply with your request for erasure we will always tell you our reason for doing so.

When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.

5.5 Right to restrict processing

You have the right to request that we restrict our processing of your Personal Information in certain circumstances, for example if you dispute the accuracy of the Personal Information that we hold about you or you object to our processing of your Personal Information for our legitimate interests. If we have shared your Personal Information with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your Personal Information.

5.6 Right to rectification

You have the right to request that we rectify any inaccurate or incomplete Personal Information that we hold about you. If we have shared this Personal Information with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. You may also request details of the third parties that we have disclosed the inaccurate or incomplete Personal Information to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

5.7 Right of data portability

If you wish, you have the right to transfer your Personal Information between service providers. In effect, this means that you are able to transfer the details we hold on you to another third party. To allow you to do so, we will provide you with your data in a commonly used machine-readable format so that you can transfer the data. Alternatively, we may directly transfer the data for you.

5.8 Right to complain

You have the right to lodge a complaint and can contact us via email at hello@propair.me. You also have the right to make a complaint to your local supervisory authority which is the Information Commissioner's Office in the UK and you can find out their current contact details on their website.

6. Legal conditions for using your Personal Information

Here we explain why and when we have the legal right to use your Personal Information in certain ways.

6.1 Where using your data is in our legitimate interests

We are allowed to use your Personal Information where it is in our interests to do so, and those interests aren't overridden by your data protection & privacy interests.

We believe that our use of your Personal Information is based on our legitimate interest when allowed by law, including but not limited to:

- to help us satisfy our legal obligations;
- to help us understand the people that use our services better and provide better, more relevant services to them;
- to help us prevent fraud and improve the safety and security of our users;
- to ensure that our systems, websites, platforms & apps run smoothly; and
- to help us keep our systems, websites, platforms & apps secure and prevent unauthorized access or cyber attacks.

We don't think that any of the activities set out in this privacy policy will prejudice you in any way. However, you do have the right to object to us processing your Personal Information on this basis. We have set out details regarding how you can go about doing this in the section 5 above.

6.2 Where you give us your consent to use your Personal Information

We are allowed to use your data where you have specifically consented.

We require your consent when we carry out background checks or collect sensitive information such as your ethnicity, etc.

You have the right to withdraw your consent at any time. We have set out details regarding how you can go about this the section 5 above.

6.3 Where using your Personal Information is necessary for us to carry out our obligations under our contract with you

We are allowed to use your Personal Information when it is necessary to do so for the performance of our contract with you, for example (but not limited to) providing you the information and/or services you registered with us for.

6.4 Where processing is necessary for us to carry out our legal obligations

As well as our obligations to you under any contract, we also have other legal obligations that we need to comply with and we are allowed to use your Personal Information when we need to in order to comply with those other legal obligations.

7. DBS Code of Practice Policy Statement (for ProPair employees)

Here we detail our DBS background checking policy for handling, use, storage, retention and disposal of certificates and certificate information of our employees.

7.1 General principles

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, ProPair complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

ProPair also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, please see below.

7.2 Storage and access

Certificate information will be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

7.3 Handling

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

7.4 Usage

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

7.5 Retention

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints.

If in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, we will consult the DBS about this and will give full consideration to the Data Protection and Human Rights of the individual before doing so.

Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

7.6 Disposal

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

We will not keep any photocopy or other images of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

7.7 Acting as an umbrella body

Before acting as an umbrella body (an umbrella body being a registered body which countersigns applications and receives certificate information on behalf of other employers or recruiting organisations), we will take all reasonable steps to satisfy ourselves that they will handle, use, store, retain and dispose of certificate information in full compliance with the [code of practice](#) and in full accordance with this policy.

We will also ensure that anybody or individual, at whose request applications for DBS certificates are countersigned, has such a written policy and, if necessary, will provide a model policy for that body or individual to use or adapt for this purpose.