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Qneiform respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information, and how you can exercise your privacy rights.

What does Qneiform do?

For more information about Qneiform please see the “About” section of our Website.

Contents:

Customer data

- What personal information does Qneiform collect and why?
- Who does Qneiform share my personal information with?
- Legal basis for processing personal information
- Cookies and similar tracking technology
- How does Qneiform keep my personal information secure?

Platform data

- What personal information does Qneiform collect and why?
- Who does Qneiform share my personal information with?
- Legal basis for processing personal information
- How does Qneiform keep my personal information secure?

Your data protection rights

- International-data-transfers
- Data retention
- Updates to this notice
- How to contact us

Customer data:

This Privacy Notice applies to our use of any and all personal information collected by us in relation to your use of our services and products and any related correspondence.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

What personal information does Qneiform collect and why?

The personal information that we may collect about you broadly falls into the following categories:

Information that you provide voluntarily:

Certain parts of our Website may ask you to provide personal information voluntarily: for example, we may ask you to provide your contact details in order to subscribe to marketing communications from us, book a demo of the platform and/or to submit enquiries to us. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

Information that we collect automatically:

When you visit our Website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws. Specifically, the information we collect automatically may include information such as your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked. Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors. Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies and similar tracking technology” below.

Who does Qneiform share my personal information with?

We may disclose your personal information to the following categories of recipients:

To third party services providers and partners who provide data processing services to us or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information. These include our accountants, CRM platform, Facebook and LinkedIn for purposes including the facilitation of payment handling, delivery of services, advertising and marketing.

To any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.

To a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice.

To any other person with your consent to the disclosure.

Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where we need the personal information to perform a contract with you, (ii) where the processing is necessary for our legitimate interests, which, given the nature of the processing and the security measures we undertake, are not overridden by your data protection interests or fundamental rights and freedoms, or (iii) where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we collect and use your Website Data in reliance on our legitimate interests (or those of any third party), these interests will normally be to operate our Website and communicate with you as necessary to provide our services to you and for our legitimate commercial interests, for instance, when responding to your queries, improving our Website, undertaking marketing, or for the

purposes of detecting or preventing illegal activities. We may have other legitimate interests and if appropriate we will make clear to you at the relevant time what those legitimate interests are.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to contact us” heading below.

Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, “Cookies”) to collect and use personal information about you. A Cookie is a small file that resides on your computer’s hard drive and often contains an anonymous unique identifier and is accessible only by the web site that placed it there, not any other sites. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice.

How does Qneiform keep my personal information secure?

Data security is of great importance to Qneiform and to protect your personal information we have put in place suitable physical, electronic and managerial procedures to safeguard and secure personal information collected online. For example, controlling internal access, implementing strict controls and minimising sending of information via non-encrypted channels. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

Platform data

This Privacy Notice applies to our use of any and all personal information collected by us for inclusion on the Qneiform Codex (“Platform Personal Data”).

If you have any questions or concerns about our use of your personal by reason its inclusion on the Qneiform Platform, then please contact us using the contact details provided at the bottom of this Privacy Notice.

What personal information does Qneiform collect and why?

The purpose of processing Platform Personal Data is to allow businesses that subscribe to the Qneiform Codex (“Subscribing Organisations”) and their clients to better understand the professional talent landscape and identify high-potential individuals who may be suitable hires for organisations in the space. Doing so allows Subscribing Organisations to contextualise the wider data-set that we hold, thereby facilitating more relevant approaches to the individuals in the space and more well-informed offerings of career opportunities and professional services.

The personal information that we may collect about you broadly falls into the following categories:

Information that you or one of your company employees provides to us voluntarily

Occasionally company employees will provide us with personal data relating to themselves and their company, including names and responsibilities of key personnel, so that the platform can have the most up to date and accurate data possible.[If, as a company employee, you provide personal

information to us about other company personnel, you confirm that you have informed them of our identity and the purposes (as set out in this Privacy Notice) for which their information will be processed. There may be circumstances in which we would tell them where we got the information from.]

Information that we obtain from third-party sources

The majority of Platform Personal Data is collected from third party sources, such as official open registers, in-house research and industry data providers. We can provide further information on these sources on request. This data pertains to the individuals involved with high-performing companies across industries (mainly but not exclusively financial services, legal services, and management consulting) in the UK, Europe, and US. The data that we hold on these individuals includes names, qualifications, experience, information relating to employment history, professional skills, and information on diversity. We have checked that the relevant third-party data providers either have your consent or are otherwise legally permitted or required to disclose your personal information to us. **We do not record or distribute any contact information whatsoever.**

Who does Qneiform share my personal information with?

We disclose Platform Personal Data to the following categories of recipients:

To our Subscribing Organisations, who process Platform Personal Data in accordance with their selected usage privileges for primarily the following purposes:

- Internal evaluation in connection with making decisions to include individuals in hiring processes or offer other opportunities to one or more individuals included in the Qneiform Codex.
- Disclosing Platform Personal Data exported from the Platform on a one-to-one basis to selected clients or prospective clients for the purposes of internal evaluation by such clients or prospective clients in connection with making decisions to initiate hiring processes or seek to include certain individuals in hiring processes.

To any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;

Third party service providers (as permitted by Qneiform in writing from time to time): Accountants, auditors, lawyers and other outside professional advisors; IT systems, support and hosting service providers; document and records management providers; and similar third-party vendors and outsourced service providers assisting Qneiform or a Subscribing Organisation in carrying out business activities.

To a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your Platform Personal Data only for the purposes disclosed in this Privacy Notice

To any other person with your consent to the disclosure.

Legal basis for processing personal information

The legal basis for which we process Platform Personal Data is Article 6(1)(f) GDPR – Legitimate Interests.

The processing of limited Platform Personal Data is necessary for the effective use of the Qneiform Codex as it enables Subscribing Organisations to identify high-potential individuals in the Qneiform Codex and their relationships to other individuals in the codex. Without being able to do so, the rich talent and ecosystem data we hold in the Qneiform Codex has little context for it to be used in a meaningful and relevant way.

It's worth noting that the platform only holds basic information such as names, job titles, qualifications, experience, information relating to employment history that are needed to identify the relevant individuals and organisations. We are not seeking to infer further information about individuals or, for example, build risk profiles.

There are a number of legitimate interests dependent on the effective use of the Qneiform Codex. In particular, the Qneiform Codex leads to a better supported recruitment market by ensuring that hiring organisations and recruitment professionals are better informed about the relevant talent landscape in which they operate. Featured individuals benefit from more relevant contact from our Subscribing Organisations. Such contact can ultimately help to support their professional role by leading to greater accessibility of recruitment processes and more relevant and interesting approaches. Subscribing Organisations clearly benefit from the Qneiform Codex by being able to make better informed decisions in a variety of areas, from making hires and placements to informing their HR strategy.

All Platform Personal Data is of a limited nature, relates to individuals in a professional capacity and is otherwise publicly available by virtue of having been made public by the company in which the individuals are involved (usually via the company's website) or by the individual concerned (through public social media). Consequently, the proposed use of the personal data is related to the individuals' role within their company and is likely to elicit relevant contact within the reasonable expectations of those individuals i.e. from professional organisations offering career opportunities or other suitable offerings to the individual or the company that the data subject represents.

The legitimate interests of Qneiform and our Subscribing Organisations (as indicated above) are not overridden by any particular interests or fundamental rights and freedoms of the data subjects included in the Qneiform Codex, particularly taking into consideration the substantial potential professional benefits for the data subject, the fact that the processing of the relevant personal information is likely to align with the reasonable expectations of the data subject, and the safeguards that we put in place, for example:

Our Data Policy imposes strict requirements on our Subscribing Organisations' use of data subjects' information to ensure that the rights and freedoms of data subjects are protected.

We do not store or share contact details for data subjects so in no way facilitate unwanted or unwarranted contact or interaction.

We have various other technical and organisational processes in place to reduce any risks to data subjects, such as only showing their name and company position as displayed on their company's website or on their own professional social media page.

Our research team takes reasonable steps to verify Platform Personal Data and to check/update it at regular intervals.

Our Terms dictate that, on cancellation, all Subscribers delete Platform Personal Data exported from the Qneiform Codex and requires certain contractual restrictions to be placed on use of any Platform Personal Data disclosed to Subscribing Organisations' clients.

If you have questions about or need further information concerning the legal basis on which we collect and use Platform Personal Data, please contact us using the contact details provided under the "How to contact us" heading below.

How does Qneiform keep my personal information secure?

Data security is of great importance to Qneiform and to protect your personal information we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Platform Personal Data. For example, where appropriate we use encryption in transit and at rest, have strict and secure access controls. Our Terms and Conditions and Data Policy prescribe certain practices and procedures to which our Subscribing Organisations must adhere. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

Your data protection rights

You have the following data protection rights:

If you wish to request access to, or correction, updating or deletion of, your personal information, you can do so at any time by contacting us using the contact details provided under the "How to contact us" heading below.

In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "How to contact us" heading below.

You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you. You may also update your email preferences to choose the types of emails you receive. To opt-out of other forms of marketing (such as postal marketing), then please contact us using the contact details provided under the "How to contact us" heading below.

Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You have the right to complain to a data protection authority about our collection and use of your personal information, though we would ask that you try to solve any issue with us directly first.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

Specifically, our Subscribing Organisations and third party service providers and partners operate around the world. This means that when we collect your personal information we may process it in any of these countries.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice. These include implementing the European Commission's Standard Contractual Clauses for international transfers of personal information, which require all partners to protect personal information they process from the EEA in accordance with European Union data protection law.

The relevant Standard Contractual Clauses can be found [here](#).

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so. Please note:

If you sign up for marketing emails from us we retain your personal data until you opt out of receiving such communications using the "opt-out" or "unsubscribe" link provided in such communications. In such circumstances, we retain a suppression file that contains the details necessary to ensure that we continue to respect such opt-out.

If you register for a demo and do not subsequently subscribe to the Qneiform Codex on behalf of your organization, we retain your details for 24 months after any interaction.

Details of an individual's involvement with a company on the platform will remain visible for the duration that it is in the public domain.

Your information may be retained for longer for example, to provide you or your organisation with a service you have requested or to comply with applicable legal, tax or accounting requirements. It may also be retained for shorter periods if required to do so by applicable law. When we have no ongoing business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform those impacted, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Privacy Notice.

How to contact us

If you have any questions or concerns about our use of your personal information, please contact Nora Kovacs using the following details: contact@qneiform.com

The data controller of your personal information is Qneiform Holdings B.V. (Dutch registered company 91719011, 9743 Groningen, the Netherlands, Atoomweg 6b).