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1. General

Intelligent Ways Limited trading as heyya (“heyya”, “we” or “us”) is the Data Controller of the personal data that you provide to us or that we receive. heyya is registered with company number 10191578 and our registered address is Atomic House, 50 High Pavement, The Lace Market, Nottingham, NG1 1HW.

2. Who We Are and What We Do

We are a recruitment agency that provides remote and onsite candidate sourcing support, recruitment services and operates recruitment business. With legitimate interest, we collect personal data to allow us to undertake our business and to source candidates for our clients. People that we collect personal data from include: prospective and live client contacts; prospective and placed candidates for permanent and contract roles; supplier contacts to support our services; employees, consultants and temporary workers.

3. Privacy Statement and Notice

Your privacy is important to us. heyya is committed to protecting and respecting your privacy and the information that you share when you use heyya’s services. This Privacy Policy (“Policy”) explains how we share and transfer personal data that you provide to us (including how we collect, manage and process your personal data) when you use our site or services. It also informs you of your rights, and how you exercise them, with relation to the privacy practices associated with the use and disclosure of personal data through the site and heyya services.

You agree to the terms of this Privacy Policy by submitting information, including personal data, through the site or our services. If you do not agree, you should discontinue use of the site and any services immediately. Please contact us if you have any questions about this Policy at info@goheyya.com.

4. What Information We Collect and How We Use It

In the interest of providing the most relevant employment opportunities we need to process certain information.

The information about you we may collect, hold and process is set out below:

- Name
- Contact details such as an email, telephone number and address
- Education details
- Employment history

- National Insurance Number
- Immigration status
- References and background checks
- Other relevant information you may choose to share such as your salary expectations or other non-public information

If necessary, and in accordance with local laws and requirements, we may also collect information related to security clearance status, details of any criminal records or diversity.

Other ways we collect personal data are when you sign up for marketing emails, events or other opportunities through heyya.

If you are a client of heyya, we may need to collect and use information about you and individuals at your organisation such as the relevant hiring managers or your top performing employees to allow us to match and introduce you to relevant applicants and provide you with our recruitment services. These services include providing you with our subscription sourcing services, internal recruitment services or notifying you of content published by heyya which may be relevant to you.

heyya may also store information in accordance with data protection laws relating to previous engagement with us, including job applications, job interviews, email and telephone communications and job placements or introductions to heyya clients or our network.

Here are some examples of how we use your data:

- To provide, develop, and enhance our service
- To respond to feedback, requests, and monitor security for the service
- To provide users with marketing communications, materials, and other third party information
- To enforce our terms or rights under any agreement between you and heyya
- To perform any other action deemed necessary by heyya in its provision of the service, interactions with you, or any other third party

We may also store information locally on your device, for instance in your local cache. We also receive data about you from other companies or third parties and may add this information to the information we have already collected from you via the site and our services in order to improve the services we provide to you.

heyya may also collect and create anonymous data about you, which does not identify any personal information about you and may be disclosed in our sole discretion.

5. Where We Obtain Your Information

Heyya obtains candidate information from a number of sources which may include:

- When you register or apply for jobs
- When you visit our website
- When you correspond with us by phone, email or otherwise

- Through your online profiles
- When you register your CV on a job board and it matches certain criteria
- When you apply for a role via a job board
- When you are referred by a friend or colleague

When we obtain your information from external sources such as LinkedIn, corporate websites and job boards we will contact you within a reasonable timeframe to ensure that our services are appropriate or relevant to you. Any information we receive in this manner may be subject to the privacy settings you have with the site in question, so please consult that site's privacy and data practices. We will not be responsible for any practices of that social networking site.

If you are a client of heyaa, the two main ways we collect client data are directly from you and from third parties such as referrals made by other heyaa clients, networking, candidates, online search engines, online job boards and LinkedIn.

6. Email Communication

We may send you emails, including marketing, promotional, educational and third-party related communications. If you wish to no longer receive these emails, you can opt out at any time by unsubscribing or through our services. Opting out of communications does not include service related communications, which may be required to inform you of updates to our terms of service or Privacy Policy.

7. Analytics

We may use analytics tools to collect information regarding your site or service usage. This information is used to improve the site and our services.

8. Retention, Modification, or Deletion of Your Information

We will retain personal information we collect from you for the period allowable by law. This length of time will depend on the services we perform for you and for how long you require these. Due to the nature of our services, the purpose for which we retain data is often an ongoing purpose as it supports candidates with introductions to our clients and often placements over an extended period. Personal data that we process shall not be kept for longer than is necessary for its intended purpose.

We therefore conduct regular data-cleansing and updating exercises with our candidates to ensure that the data that we hold is accurate, and up to date, and that it remains relevant for the purposes for which it was collected. We are required to do this under new data protection regulations (GDPR) and subsequently we will make an effort to regularly communicate with you to ensure your data is up to date and accurate.

If you communicate with us about potential roles, by either written or verbal communication, or engage with our marketing communications such as when we may email you, we will consider there to be meaningful contact. We will also consider there to be meaningful contact when you submit your updated CV onto our website, apply for jobs or we receive an updated CV from a job board.

You may request deletion of your personal data by us, and we will use commercially reasonable efforts to honor your request, but please note that we may be required to keep such information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database, but may remain in our archives.

For a list of all data categories and retention periods, please contact info@goheyya.com.

9. Legitimate Interests

At heyya, we take your privacy seriously and will only use your personal information for the purpose of providing you with our recruitment services or administration purposes. In the capacity as an employment business, agency, remote or onsite recruitment provider, the personal information we have collected about you is used to provide our services to you to help you find suitable work. This work may be on a temporary or permanent basis based on your requirements and preferences.

We believe it is reasonable to assume that, if you have posted your professional CV information on a professional networking website, job board or are looking for employment, you acknowledge that it is fair to collect that public information and otherwise use your personal data to provide our recruitment services. You also acknowledge that it would be fair to use that information to assess your skills and match these against heyya's live vacancies, approach you as a recruiter and share your information with prospective employers. Nearer the end of the interview process with a prospective employer, they may request references, your qualifications and confirm whether you have a criminal record which we will ensure is in accordance with the laws and regulations.

In order to propose relevant roles or available job opportunities, heyya therefore believes it is reasonable for us to process your data and subsequently contact you. Your data may also be needed for our internal administrative activities.

10. Data Sharing

We do not disclose personal data we collect about you, except as described in this Policy or as we disclose to you at the time this information is collected. As required under GDPR, we will only share your information with our clients that we believe match your requirements or, to prospective employers where deemed appropriate.

We may also share your information with associated third parties where we believe it is appropriate to provide you with the best possible service and we have an applicable processing agreement in place. Should you not wish heyya to share your data, please contact us at info@goheyya.com.

Other ways in which we may share your information are as follows:

Trusted Third Parties. During the course of your job application process, you or our clients may request personal and sensitive personal information relating to psychometric evaluations or skills tests, qualification checking, background checking, criminal reference checking or verification of details you have provided from third party sources.

We may also share your personal information with other third parties we engage with to perform duties on our behalf such as; IT consultants carrying out development and testing work on our business technology systems, data analytics providers, research and mailing houses, and professional advisors.

The aforementioned third parties are required to provide minimum standards of confidentiality and data protection of any shared personal information under GDPR. Third parties outside the EEA that heyya provide personal information to, or where third parties access personal information, heyya will ensure that approved measures are established such as the EU/US Privacy Shield or Model Clauses.

Remote and Onsite Clients. Where we are operating as an internal remote or onsite HR support function with our clients, heyya will obtain and control your information.

Business Transfers. If we are involved in an acquisition, merger, financing due diligence, reorganisation, bankruptcy, receivership, sale of all or a portion of our assets, or transition of service to another provider, your personal data and other information may be transferred to a successor or affiliate as part of that transaction along with other assets.

Legal Requirements. We may share your personal information if we deem disclosure necessary or if required to do so by law such as GDPR.

11. Your Rights Relating to Your Personal Data

It is your choice whether or not you provide personal data. If you choose not to provide information that is needed to use the features of our site or services, we may be unable to process your request or you may be unable to use those features.

You have the right at any time to ask us for a copy of the personal information that we hold about you. heyya will require evidence of your identity in order to act on your request.

If you would like to make a request for the data we currently hold about you please contact info@goheyya.com.

11.1 Data Subject Access Requests

You have the right to choose whether or not we process your personal data and, where we do, access to the personal data at any time. You also have the right of access to additional information which includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. You may request a copy of your personal data and providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data as per the relevant data

protection legislation appropriate to the jurisdiction. To make a data subject access request on the data we currently hold on you, please contact info@goheyya.com.

11.2 The Right to Rectification

You have the right to have any out of date or inaccurate personal data about you rectified and to have any incomplete personal data about you completed. You can do this by contacting us at info@goheyya.com.

11.3 The Right to Erasure

In some circumstances you have the right to the erasure of your personal data that we hold about you without undue delay. However, there are exclusions of the right to erasure where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

11.4 The Right to Restrict Processing

You have the right to restrict the processing of your personal data. An example of those circumstances include; you contest the accuracy of the personal data we hold and during the period where we are verifying its accuracy. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process your personal data with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

11.5 The Right to Object to Processing

You have the right to object to our processing of your personal data and you can do so by contacting us at info@goheyya.com. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation.

12. The Right to Data Portability

In certain circumstances, you have the right that we provide the personal information we hold about you either to you or a third party in a commonly used format. Circumstances include where you have provided

your information to us previously. However, this only applies if we are processing it using automated means.

heyya cannot guarantee technical compatibility with a third party organisation's systems. In circumstances where you request for personal information of others, we will require their consent.

If you would like more information about this, please email us at info@goheyya.com.

Please be aware that most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.

13. The Right to Withdraw Consent

If our right to process or share your personal information is based on your consent, you have the right to withdraw that consent at any time. You may do so by emailing us at info@goheyya.com.

Withdrawal will not affect the lawfulness of any processing we conducted before the withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.

14. Data Protection Officer

heyya has appointed a Data Protection Officer to ensure continued commitment to privacy and security practices. For further information please contact us at info@goheyya.com.

15. Third Party Services

The site or our services may contain links to third party websites and services for your convenience only. When you click on a link to any other website, location, or service you will leave the site or our services and go to another site or service and another entity may collect data from you. heyya are not responsible for, and do not control such third party websites or services, nor do we recommend, screen, review, or have any control over the actions taken by these third parties. Your use of these services is solely your choice and decision. Please review every third party website or service you visit or use, including those that you interact with through our services.

16. International transfer

If you are accessing our site from the European Union or other regions with laws governing data collection and use, your personal information may be transferred or processed in one or more other

countries, in or outside the European Union for the purposes described in this Privacy Policy. The data may also be transmitted to our service providers who support our business operations as described above. In circumstances where we transfer your personal information outside of the European Union, such as the United States, we will take appropriate steps to ensure that your personal information receives an adequate level of security where it is processed, that your data privacy is preserved and your rights remain protected.

Please note, the United States may have less stringent, or otherwise different data protection laws from the laws in effect in the country in which you are located. If you would like to find out more information, please email info@goheyya.com.

17. Security

heyya care about protecting the security of your personal data. We use strict operational procedures and a variety of industry-standard security technologies and procedures to help protect your personal data from unauthorized access, use, transmission or disclosure. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure or error free. This also includes e-mails sent to or from us may not be secure. Therefore, you should take special care in deciding what information you send to us via the services. Please keep this in mind when disclosing any personal data to heyya via the Internet. In addition, we are not responsible for circumvention of any privacy settings or security measures contained on the site, the services, or third party websites. While heyya uses reasonable efforts to keep your personal data secure, heyya cannot guarantee its absolute security.

18. A Note About Children

heyya does not by intention collect personal data from individuals who are under the age of 13. If a child under 13 submits personal data to our site and we learn that the personal data is the information of a child under 13, we will attempt to delete the information as soon as possible. If you believe that we might have any personal data from a child under 13, please contact us at info@goheyya.com.

19. Changes To this Privacy Statement, Notice, and Policy

We may update this Privacy Policy at any time and for any reason. We will endeavor to provide you advanced notice of any important updates of this Privacy Policy or of updates as to how we use your information, and where appropriate ask for your consent through methods either on our site or by contacting you using other channels of communication. However, we won't alert you to every little change. Ideally you should consult with this Privacy Policy regularly for any changes. Continued use of the site or our services shall indicate your acknowledgement of such changes and agreement to be bound by the terms of such changes. If you do not agree, you should immediately discontinue your use of the site or our services.

20. Regulatory and Law Enforcement Agencies

In circumstances where we receive a request from a regulatory body or law enforcement agency, we may disclose certain personal information to such bodies or agencies if permitted under GDPR or other applicable laws.

21. Concerns

Should you have any concerns about the way we are collecting or using your personal data, in the first instance you should raise your concern with us or directly to Information Commissioners Office at <https://ico.org.uk/make-a-complaint>.

22. Contact

Please feel free to contact us should you have any questions or requests regarding our data processing practices at info@goheyya.com.