

Privacy Policy Notice

Effective: May 25, 2018

Our Privacy Policy explains how Happy Work collects, uses, and discloses information about you. The terms “Happy Work,” “we,” “us,” and “our” include Happy Work, Ltd. and our affiliates. We use the terms “candidate,” “you,” and “your” to mean any person using our Platform or engaging with compatible jobs or candidates, including any organization or person using the Platform on an organization’s behalf. This Privacy Policy applies to the processing of information about members and other individuals that we collect when you use our “Platform,” which means any website, application, or services we offer, or when you communicate with us. For information about choices that we offer under this policy, please see “Your Choices” below. This Privacy Policy does not apply to the information that you may provide to third parties, such as members, and others with whom you may share information about yourself. For more information about the scope of our Privacy Policy, please see Section 4.5.

To make this Privacy Policy easier to understand, we have provided summaries in these gray boxes. These summaries are not part of the official policy. Even though we have provided summaries, it is important for you to read the entire policy carefully. If you wish to access any particular section of this Privacy Policy, use the list below to jump to that section.

1. Collection Of Information
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1. Collection Of Information

Summary: We collect information about you when you:

- Create an account;
- Complete your assessments;
- List a job vacancy;
- Engage with a candidate or vacancy;
- Visit our website; and
- Communicate with us.

We also collect information, such as usage statistics, by using cookies, server logs, and similar technologies.

If you elect to use certain features, we also collect information through other sources, such as social media services, invitations, and imported contacts.

1.1 Information You Provide to Us

We collect information that you provide directly to us. For example, we collect a job-seeker's information when you register with us, fill in the required fields before the assessments begin, complete the behaviour, numerical and verbal reasoning assessments, communicate with Happy Work, or any of the employers who post jobs on the platform. The types of information that we may collect on job-seekers include your full name, telephone number, email address, password, postal address, education and work history, your preferred location for work, work Visa status, CV/ portfolio and display picture. The types of information that we may collect on employers include your company description, logo, company website, payment information (entered on Happy Work; stored securely on Stripe; stripe.com/gb. When an employer decides to post a job on our platform, Happy Work stores their job title, job description, location, annual salary, contract length, hours per week, desired competencies and motives, numerical and verbal reasoning scores, Visa status and academic attainment of their ideal candidate. Happy Work also stores any other information that the employer and candidate exchange by their direct messaging feature. Additional information - such as employer or job-seeker's profile display picture, the job-seeker's ethnicity, as well as job-seeker's links to their Facebook, Twitter and LinkedIn profiles - is optional. See Section 2 to learn how we will use the information that you provide to personalise our recommendations and other content to you.

The information gathered from Talent Strength's psychometric assessments integrated into happywork.com (their competency potential, motivations, numerical and verbal

reasoning scores) are stored securely by Talent Strengths Ltd. Scores can be “brought forward” by Happy Work’s system for purposes of matching, but the data is stored on Talent Strengths’ secure server at talentstrengths.com.

1.2 Information We Collect Automatically When You Use the Platform

When you use our Platform, we automatically collect information about you, including:

- **Log Information:** We collect log information about your use of the Platform, including the type of browser that you use; the time, duration and frequency of your access; Platform pages viewed; your IP address; and the page you visited before visiting our Platform.
- **Device Information:** We collect information about the computer or mobile device that you use to access our Platform, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
- **Location Information:** We may collect information about the location of your device each time you use our Platform based on your consent to the collection of this information. For further information see Section 5.2.
- **Information Collected by Cookies and Other Tracking Technologies:** We and our service providers collect information using various technologies, including cookies and pixel tags (which are also called clear GIFs, web beacons, or pixels). Cookies are small data files stored on your hard drive or in device memory that help us improve our Platform and your experience, and track usage of our Platform. Pixel tags are electronic images that may be used in our Platform or emails, and track usage of our Platform and effectiveness of communications.
- **Other Information:** With your permission, we may collect other information from your device, such as photos from your camera roll, contacts of individuals you wish to find or connect with, or calendar information you want to manage via the Platform.

1.3 Information We Collect From Other Sources

We may collect information about you from other sources, such as through certain features on the Platform you elect to use, but only where these third parties either have your consent or are otherwise legally permitted or required to disclose your information to us. Examples include:

- **Social Media Services.** If a job-seeker or employer uploads their social media account information onto their Happy Work profile, icons will appear underneath their display picture on their profile page, which will be visible to and direct other

users to them. An employer who posts a job, matches with a compatible candidate who has uploaded their Facebook URL, might click through onto Facebook to gain a further insight into that individual. In this way, social media connectivity might be used by employers or job-seekers to learn more about the person or organisation that they have matched with. If a user wishes to remove their social media profiles from Happy Work, they have to visit their Profile page, click “Manage Social Media”, removed the desired account and click Save.

- Invitations. If another member sends you an invitation through our Platform, we may receive certain personal information, such as your name, email address, or phone number. If you are an invited guest, we will automatically send you an invitation to our Platform, and, if unanswered, a one-time follow-up invitation. Happy Work stores this contact information only to send these invitations and evaluate their success. You may unsubscribe from future invitations using the instructions in those messages. You may also contact us at hello@happywork.com to request that we remove this information from our database.
- Member Content. We may receive information about you when you or another member uploads photos or posts other content to the Platform. For further details about the rights over this information available to individuals, see Section 6.
- Information From Other Third-Party Sources. In order to provide you with more tailored recommendations, we may obtain information about you from publicly and commercially available sources and other third parties as permitted by law. For more information about the data that we obtain from these providers, please contact us at hello@happywork.com.

2. Use Of Information

Summary: We use information about you to:

- Operate, improve, promote, and protect Meetup and our Platform;
- Communicate with you; and
- Personalize content.

2.1 Operating our Platform

We may use information about you for various purposes related to operating our Platform, including to:

1. Provide, maintain, and improve our Platform, including to process transactions, develop new products and services, and manage the performance of our Platform;
2. Display information about you, for instance, a personal statement, which will be visible on your profile;
3. Personalize the Platform, for example, to suggest content in which we think you may be interested (including content given special protection under EU law or that relates to sensitive topics such as health, political opinions, religion, and sexual identity);
4. Allow you to share information about your use of the Platform through a third-party social media service, if you connect your account through that service (which you can turn off at any time) and to provide you with better recommendations;
5. Monitor and analyze trends, usage, and activities in connection with our Platform; and
6. Detect, investigate, and prevent fraudulent transactions, abuse, and other illegal activities; to protect the rights, property, or safety of Happy Work and others; to enforce compliance with our policies; and to comply with applicable law and government requests.
7. Perform accounting and administrative tasks, and enforce or manage legal claims.

2.2 Communicating With You

We may use information about you for various purposes related to communicating with you, including to:

1. Respond to your comments, questions, and requests, and provide customer service;
2. Communicate with you, in accordance with your account settings, about products, services, and events offered by us and others, to provide news and information that we think will be of interest to you, to conduct online surveys, to contact you about events on our Platform that are being held near your location, and to otherwise communicate with you in accordance with Section 2.3;
3. Notify you about communications of other members, in accordance with the communication preferences that you indicate in your account; and
4. Send you technical notices, updates, security alerts and support, and administrative messages.

2.3 Advertising And Other Uses

We may use information about you for various other purposes, including to:

1. Provide content, features, or sponsorships that match job-seeker behaviour profiles or current location or preferred location for work;
2. Facilitate contests and other promotions;
3. Combine with information that we collect for the purposes described in this Privacy Policy; and
4. Carry out any other purposes described to you at the time that we collected the information.

2.4 Legal Basis for Processing

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

1. We process information about you in order to provide our services in accordance with our Terms of Service, for example to allow employers and job-seekers to match with each other, or to display job-seekers' profiles to recruiting employers or vice versa, and to allow us to send you important service updates.
2. We also process information about you where it is in our legitimate interests to do so and not overridden by your rights (for example, in some cases for direct marketing, fraud prevention, network and information systems security, responding to your communications, the operation of networks of groups by the network administrators, and improving our Platform).
3. Sometimes you provide us with sensitive information about you; for instance, your competency potential scores for a range of attributes, your CV, as well as a measure of your numerical and verbal reasoning ability. Completing Happy Work's assessment, or posting information on the Platform about these topics is entirely voluntarily and done with your explicit consent.
4. In some cases, we may also have a legal obligation to collect information about you, or may otherwise need the information to protect your vital interests or those of another person.
5. We may also process information to comply with a legal requirement or to perform a contract.

3. Sharing Of Information

Summary: We do not share information about you in any way other than as described in this Privacy Policy.

We may disclose information about you:

- to members or social media services, subject to the choices you may make via the Platform;
- to our third-party service providers who help us to operate or improve our Platform;
- to authorities to comply with legal obligations and to protect and defend our rights and property; and
- to an affiliate or successor entity as part of a corporate transaction.

We may also share de-identified or aggregated information.

3.1 Through Our Platform

We share some of the information that we collect by displaying it on our Platform according to your member profile and account settings. Any of the information that we collect on job-seeker's (full name, contact details, psychometric test scores...) are visible only to employers who have posted a job, identified attributes that are compatible with the candidate's profile and paid for access to their candidate shortlist. Other information, such as the employer's payment details, are entered into the "Payment Details" page of happywork.com, but stored securely on stripe.com and not made visible to any of the administrators or users of Happy Work's platform.

3.2 With Our Service Providers

We may use service providers in connection with operating and improving the Platform to assist with certain functions, such as payment processing, email transmission, conducting surveys or contests, data hosting, managing our ads, and some aspects of our technical and customer support. We take measures to ensure that these service providers access, process, and store information about you only for the purposes we authorise, subject to confidentiality obligations.

3.3 Following The Law And Protecting Happy Work

We may access, preserve, and disclose information about you to third parties, including the content of messages, if we believe disclosure is in accordance with, or required by,

applicable law, regulation, legal process, or audits. We may also disclose information about you if we believe that your actions are inconsistent with our [Terms of Service](#) or related guidelines and policies, or if necessary to protect the rights, property, or safety of, or prevent fraud or abuse of, Meetup or others.

3.4 Affiliate Sharing And Merger, Sale, Or Other Asset Transfers

If Happy Work is involved in a merger, acquisition, financing, reorganization, bankruptcy, or sale of our assets, information about you may be shared, sold, or transferred as part of that transaction. We may also share information about you with current or future corporate parents, subsidiaries, or affiliates.

3.5 Other Situations

We may anonymise or aggregate information about you and share it freely, so that you can no longer be identified. We may also share information about you with your consent or at your direction or where we are legally entitled to do so.

4. Additional Details

Summary:

- With your permission, we may allow others to use technologies that collect information about you to provide analytic services, and to serve ads for Happy Work. You may be able to disable the collection or use of this information.
- Happy Work is based in and governed by U.K. law and we will be processing, transferring, and storing information in and to the U.K. and other countries.
- We use commercially reasonable efforts to protect your personal information and have implemented technical and organisational measures in line with industry best practices. We cannot guarantee these controls will provide absolute security.
- This Privacy Policy is periodically updated, and does not apply to third parties.

4.1 Analytics and Advertising Services Provided by Others

With your permission, we may allow others to use cookies, web beacons, device identifiers, and other technologies to collect information about your use of the Platform and other websites and online services. See our Cookie Policy for details about these

technologies and the information that they collect, use, or share, including how you may be able to control or disable these services.

4.2 Transfer Of Information To The U.K. And Other Countries

Happy Work is based in the United Kingdom. Information about you will be transferred to, and processed in, the U.K. and 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 and, in some cases, may not be as protective. We have taken appropriate safeguards to require that your information will remain protected in accordance with this Privacy Policy.

4.3 Security

We employ technical and organizational measures designed to appropriately protect your information that is under our control and that we process on your behalf from unauthorized access collection, use, disclosure, copying, modification or disposal, both during transmission and once we receive it. We store all information that you provide to us on secure servers. We train employees regarding our data privacy policies and procedures, and permit authorized employees to access information on a need to know basis, as required for their role. We use firewalls designed to protect against intruders and test for network vulnerabilities. However, no method of transmission over the internet or method of electronic storage is completely secure.

Where you have a password, which enables you to use our services, you are responsible for keeping this password complex, secure, and confidential. If you would like to update or change your password, you may select the “Forgotten your password?” link on the login page. You will be sent an email that allows you to reset your password.

4.4 Data Retention

We may temporarily block your account if you have not logged in for six months or more. You may contact us if you wish to reactivate your account.

We retain certain information that we collect from you while you are a member of the Platform, and in certain cases where you have deleted your account, for the following reasons:

- So you can use our Platform;
- So ensure that we do not communicate with you if you have asked us not to;
- To provide you with a refund, if entitled;

- To provide accurate accounting information to other members about the groups that they organize or administer, and associated memberships;
- To better understand the traffic to our Platform so that we can provide all members with the best possible experience;
- To detect and prevent abuse of our Platform, illegal activities and breaches of our Terms of Service; and
- To comply with applicable legal, tax or accounting requirements.

When we have no ongoing legitimate business need to process your information, we will either delete or anonymize it.

4.5 Policy Scope

This Privacy Policy does not apply to information that you provide to third parties, such as other members, including group organizers and network administrators, and others with whom you may share information about you. Our Platform may direct you to a third-party service, such as social media services, or a portion of our Platform may be controlled by a third party (typically through the use of a frame or pop-up window separate from other content on our Platform). Disclosure of information to these third parties is subject to the relevant third party's privacy policy. We are not responsible for the third-party privacy policy or content, even if we link to those services from our Platform or if we share information with these third parties.

Happy Work is a data controller. Website users, including site administrators, are directly responsible for complying with all requirements of applicable EU privacy laws in connection with the information that they obtain and process for the purposes of managing their contacts, or organizing groups, or administering networks.

4.6 Revisions To This Policy

We may modify this Privacy Policy from time to time. When we do, we will provide notice to you by publishing the most current version and revising the date at the top of this page. If we make any material change to this policy, we will provide additional notice to you, such as by sending you an email or displaying a prominent notice on our Platform.

5. Your Choices

Summary:

- You can review and change information about you or deactivate your account in your account settings, but we may retain certain information.
- You can remove photo tags if you wish.
- With your consent, we will use information about your location. You can deactivate this feature at any time.
- You have the right to opt out of receiving Meetup's promotional messages, but you may still receive other non-promotional communications.

5.1 Your Choices: Account Information

You may update or correct your account information by editing your account settings or by sending a request to hello@happywork.com as described in Section 6. You may deactivate your account by editing your account settings or by sending an email to hello@happywork.com. Both job-seekers and employers can decide who sees their information; if an employer does not want to be seen by a particular candidate, or vice versa, the employer simply has to click the Thumbs Down icon underneath the candidate's listing on their Compatible Candidates page. (Candidates can hide themselves from specific employers by clicking the Thumbs Down icon below a specific job listing on their Compatible Jobs page.)

5.2 Your Choices: Location Information

When you first access the Platform, we will collect information about your location, which we use to make better recommendations for available jobs in your area, and to improve our Platform. If you do not want us to collect information about your location, then you can prevent this:

- If using a mobile app, by changing the settings on your device.
- If using our website, your location data will be obtained via a cookie. Please refer to our Cookie Policy for additional information on how to manage our use of cookies.

Note that our Platform or its features may no longer function properly if you do.

Your mobile device settings may also give you the option to choose whether to allow us to view your location on a continuous basis, when only using the app, or never. Allowing us to view your location when you are not using the app allows us to provide you with recommendations on a regular basis. Please refer to your device's guide for additional information on how to adjust location services.

5.3 Your Choices: Cookies

We may use and allow others to use cookies, web beacons, device identifiers, and other technologies to collect information about your use of the Platform and other websites and online services. See our Cookie Policy for details about these technologies and the information that they collect, use, or share, including how you may be able to control or disable these services.

5.4 Your Choices: Promotional Communications

You can control messages that you receive from Meetup, other members, and third parties by selecting the unsubscribe link in the message that you receive. If you opt out, we may still send you non-promotional messages, such as those about your account or our ongoing business relations.

6. Data Rights

Summary:

- You may have the right to exercise your data protection rights, including to request that Meetup deletes, amends, or provides you access to your information.
- You have the right to opt out of receiving Meetup's promotional messages, but you may still receive other communications.
- You can complain to your local data protection authority about the use of your information.

We respond to all requests that we receive from individuals who wish to exercise their data protection rights in accordance with applicable data protection laws. You can contact us by sending an email to hello@happywork.com.

Rights that you may have, depending on the country in which you live, include:

- Accessing, correcting, updating, or requesting deletion of your information.
- Objecting to processing of your information, asking us to restrict processing of your information, or requesting the portability of your information.
- Opting out from receiving marketing communications that we send you at any time. You can exercise this right by selecting the “unsubscribe” or “opt-out” link in the marketing emails we send you. Additionally, you may update your email preferences by changing the settings in your account.

- Withdrawing your consent at any time if we have collected and processed your information with your consent. Withdrawing your consent will not affect the lawfulness of any processing that we conducted prior to your withdrawal, nor will it affect processing of your information conducted in reliance on lawful processing grounds other than consent.
- Complaining to a data protection authority about our collection and use of your information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the European Union are available [here](#).

Note that Happy Work is a controller of your information. Other members, such as registered recruiters, job-seekers or site administrators, may also act as controllers of your information. You should contact these members if you have any questions about how they use information that you have provided to them.

7. Contact Us

Summary:

- If you have any questions, you can contact us at hello@happywork.com.

Under European data protection law, the controller of your information is Meetup, Inc.

If you have any questions or complaints about this Privacy Policy or how we use your information, please contact hello@happywork.com.