



Privacy Notice

Pickr is committed to protecting and respecting your privacy.

This Privacy Notice together with our Terms of Use and any other documents referred to in it sets out how Pickr collects, uses, maintains and discloses Personal Data, including any information provided through our website(s) (the “**Website**”) or App.

Your privacy is paramount to us. Please read this Privacy Notice carefully to understand our views and practices regarding your Personal Data and how we will treat it.

Whenever you provide Personal Information, we are legally obliged to use it in accordance with the laws concerning the protection of Personal Information.

WHO WE ARE

PICKR LIMITED is a company incorporated and registered in England and Wales with company number 10465482 whose registered office address is 51 Colegate, Norwich, England, NR3 1DD (“**Pickr**”).

For the purposes of the Data Protection Act 2018 and any other applicable data protection and privacy laws and regulations (“**Data Protection Legislation**”), Pickr will be the ‘data controller’ for all Personal Information that we determine the means and purpose of processing.

By “**Personal Data**” or “**Personal Information**” we refer to information collected or held by Pickr, that identifies and relates to you as an individual.

INFORMATION WE MAY COLLECT AND HOW WE USE IT

When you express an interest or make an enquiry regarding our services

We may collect Personal Information directly from you. This may include, your name, email address and telephone number.

If you are a potential hire: any relevant details regarding the nature of your business and additional information that we may need to identify the services you may require from us.

If you are interested in our services for workers: we may also collect details regarding your work history and the type of services you would may request from us and the type of work and shifts you would be willing to undertake.

We may collect additional information you volunteer to us when contacting our support staff directly or via our messenger service on the Website. We will only retain the Personal Information which is pertinent to delivering your services.

If you have opted in to receive our updates and marketing communications we will handle your Personal Information (including: your name, email address and business/work details) to provide you with marketing communications in line with any preferences you have told us about.

You are not under any obligation to provide us with your Personal Information for marketing purposes. When we send you marketing emails, updates and notifications for marketing purposes every email we send to you for marketing purposes will also contain instructions on how to unsubscribe from receiving them. You can withdraw and consent to process Personal Information at any time by emailing or using the in App functions if you have signed up to Pickr.

If we rely on the legitimate interest of our business as the legal grounds to process your information for marketing purposes, we will always notify you of this and your right to object to this processing. Please see “YOUR RIGHT TO OBJECT” below. All of our marketing communications will always contain clear instructions on how to unsubscribe from future communications.

When you engage any of our services

we may collect Personal Information from you or a third party to enable us to complete the transaction or services you have requested in the following circumstances.

If you request our services as a Pickr worker we require the following information to establish and operate your account:

- your name;
- date of birth;
- postal/home address;
- CV information (work history, qualifications, experience);
- passport number (if applicable);
- national insurance number;
- relevant accreditation certificate numbers;
- medical or health information relevant to the work you may be undertaking;
- job placement information (hours worked, absence records, HR information provided by the lead employer);

- information regarding the services you request;
- bank account details for payment;
- supplementary information you provide us about yourself when contacting us;
- email address; and
- telephone numbers (including mobile).
- UTR number

When you become a client of Pickr:

- your name;
- postal address;
- invoicing details/address;
- job/service requirement details;
- information regarding the services you request;
- supplementary information you provide us about yourself when contacting us;
- email address; and
- telephone numbers (including mobile).

We may receive the information detailed above via third party (such as a lead employer using your services while registered with Pickr, or a job board you have consented to hold your information for job seeking/filling purposes) to enable us to provide our services. If you request access to your information at any time and we are not the sole controller of the data we will inform you of the other joint controller of your Personal Information.

Unless we have permission to process your Personal Information for marketing purposes (please see above) we will only use this information for completing any contractual obligations owed from either party or to provide information and updates regarding the services you have requested.

If we have received your details from a job board you have posted on and we make a subsequent approach to offer our services, we do so under our legitimate business interests and you reserve the right to object to this processing at any time. Please see "YOUR RIGHT TO OBJECT" below.

If you supply goods or services to Pickr we will collect Personal Information from you to enable us to engage your services and to provide you with payment. This may include your name, contact details, any personal services provided, professional qualifications (such as licence and regulatory details if required) and invoice or billing information.

If you join or apply to join Pickr as an employee we will require your name, email address and CV details. We will hold and process this information under our legitimate business interests until we either choose to engage you as a Pickr employee or decline to pursue the opportunity to work with you, in which case we will hold you CV for six months after our last interaction and then delete from our records.

If you become a Pickr employee, we will require the above information as well as your bank account details for payment, next of kin and any relevant health information to allow us to make reasonable adjustments where required. Where we require sensitive information, we will always ensure a legal grounds for processing exists and a relevant policy is in place.

When you visit our website we may collect technical information about you. This information may include the Internet protocol (IP) address used to connect your computer to the Internet, your browser type and version, time zone setting, operating system and platform, browser plug-in types and version, the full URL clickstream to, through and from the Website, page response times, download errors, length of visits to certain pages, page interaction (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page.

If you fail to provide us with Personal Information, this may affect how we provide our services. Where we need to collect Personal Information by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

DATA RETENTION

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

LEGAL BASIS OF PROCESSING

We will only process your information for as long as we have a relevant legal basis to do so. This is usually in order to provide you with the services you have requested from Pickr and unless stated, all of the above processing is conducted under the legal basis of performance of a contract.

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at privacy@pickr.works.

PROTECTING YOUR INFORMATION

We are committed to ensuring that your information is secure and we have procedures in place to try and prevent any unauthorised access or disclosures and to safeguard and keep secure the information that we collect online.

All the Personal Data collected by us and stored electronically is held on secure servers. Where required, this information is encrypted for additional security. We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorise access to Personal Data only for those employees who require it to fulfil their job responsibilities.

However, you should be aware that providing information over the internet can never be guaranteed as being completely safe and if you choose to send such information to us via the internet, you do so at your own risk.

We shall not transfer any Personal Data to any country outside of the European Economic Area unless we ensure that such Personal Data is subject to an adequate level of protection and appropriate legal safeguards in accordance with Data Protection Legislation.

SHARING YOUR INFORMATION WITH OTHERS

Please be assured that we will not share your information for any other reason unless we are required by law or permitted to do so under this Privacy Notice. Pickr will only share your Personal Data in the following circumstances:

- to comply with requirements under law, regulation, legal process or enforceable governmental request;
- providing your Personal Data to our clients on your behalf for job seeking purposes;
- we may use carefully selected sub-processors to help us collect, store or manage your information. This will always be managed under the terms of a written data processing agreement;
- analytics and search engine providers that assist us in the improvement and optimisation of the Website; and
- if Pickr is acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets. We process your Personal Information for this purpose because we have a legitimate interest to ensure our business can be continued by the buyer. If you object to our use of your Personal Information in this way, the relevant seller or buyer of our business may not be able to provide services to you.

YOUR RIGHT TO OBJECT

You have the right to object to us handling your Personal Information when:

- we are handling your Personal Information based on our legitimate interests. If you ask us to stop handling your Personal Information in this way, we will stop unless we can show you that we have compelling grounds as to why our use of your Personal Information should continue; and
- for marketing purposes. If you ask us to stop handling your Personal Information on this basis, we will stop.

YOUR RIGHTS TO CONTROL YOUR PERSONAL INFORMATION

You can exercise the following rights to your data by contacting us at privacy@pickr.works.

Right of access

You are entitled to receive confirmation as to whether your Personal Information is being processed by us, as well as various other information relating to our use of your Personal Information. You also have the right to a copy of the Personal Information which we are handling regarding you.

Right to rectification

You have the right to require us to rectify any inaccurate Personal Information we hold about you. You also have the right to have incomplete Personal Information we hold about you completed, by providing a supplementary statement to us.

Right to restriction

You can restrict our processing of your Personal Information where:

- you think we hold inaccurate Personal Information about you;
- our handling of your Personal Information breaks the law, but you do not want us to delete it;
- we no longer need to process your Personal Information, but you want us to keep it for legal reasons; or
- we are handling your Personal Information because we have a legitimate interest (as described in the "INFORMATION WE COLLECT AND HOW WE USE IT" section above, and are in the process of objecting to this use of your Personal Information.

Where you exercise your right to restrict us from using your Personal Information, we will then only process your Personal Information when you agree, except for storage purposes and to handle legal claims.

Right to data portability

You have the right to receive the Personal Information we hold about you in a structured, standard machine-readable format and to send this to another organisation controlling your Personal Information.

Right to erasure

You have the right to require us to erase your Personal Information which we are handling in the following circumstances:

- we no longer need to use your Personal Information for the reasons we told you we collected it for;
- where we needed your consent to use your Personal Information and you have withdrawn your consent;
- you object to our use of your Personal Information and we have no compelling reason to carry on handling your Personal Information;
- our handling of your Personal Information has broken the law; or
- we must erase your Personal Information to comply with a law we are subject to.

Cookies

A cookie is a small data file that certain websites write to your hard drive when you visit them. The only Personal Information a cookie can obtain is information supplied by the user. A cookie cannot read data from your hard disk or read cookie files created by other sites.

You can refuse cookies by turning them off in your web browser and you do not need to have cookies turned on to successfully use our website. Most browsers are defaulted to accept and maintain cookies and you can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it or not.

We use the following cookies:

Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

| Source | Cookie | Type | Purpose |
|------------------|---------|-------------|--|
| Google Analytics | Various | Performance | These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. Click here for an overview of privacy at Google |
| Hot Jar | Various | Performance | We use Hotjar in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behaviour and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique |

| | | | |
|-----------|---------|-------------|--|
| | | | <p>device identifiers), browser information, geographic location (country only), preferred language used to display our website).</p> <p>Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy by clicking on this link.</p> <p>You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by following this opt-out link</p> |
| Smartlook | Various | Performance | <p>Usage data is gathered to understand how people use our app. We use the information to gauge feature usage and inform future development. Personal data is not collected by this feature. Click here (https://www.smartlook.com/help/privacy-statement/) to view the Smartlook privacy statement</p> |

How can you make a complaint?

Please note that if you are not satisfied with the processing of your Personal Data as set out in this Privacy Notice, please contact us at privacy@pickr.works.

You have the right to issue a complaint directly with the Information Commissioners Office, the data protection supervisory authority for England and Wales (<https://ico.org.uk/concerns/>).

Links to other Websites

Our website may contain links to other websites not owned, provided or controlled by us. We are not responsible for and have not monitored their content and our privacy notice does not apply to these sites. Please refer to the privacy notices applicable to each of these sites for information as to how they handle your Personal Data.

Changes to this Privacy Notice

We may change this Privacy Notice at any time to ensure it always accurately reflects the way we collect, use and safeguard your Personal Data.

Please check this notice from time to time to ensure you are aware of any updates we may have made to our Personal Data handling practices. The date of the changes will be listed in the 'Last updated' section below. We will endeavour to notify all of our current clients of any updates to this notice via email and we will post the relevant announcement on our website homepage.

We recommend that you print a copy of this page for your reference.

Contacting us

Please contact us at privacy@pickr.works if you have any questions, comments or requests regarding this Privacy Notice.

Last updated August 2019