

## PRIVACY POLICY

THEJOBPOST LIMITED, trading as RAMP GLOBAL, is registered in England and Wales under No. 06723374. RAMP Global's registered office, and main trading address, is situated at 1-2 Paris Garden, Bankside, London, SE1 8ND ("RAMP Global").

RAMP Global is committed to respecting Your privacy and protecting Your data. This policy is aligned with the General Data Protection Regulation as incorporated into UK Law by the Data Protection Act 2018 (collectively, the "Data Protection Laws").

Throughout this Policy, RAMP Global may interchangeably refer to itself as 'We, Us, Our, or RAMP Global'. 'You' (or 'Your') shall be taken to be the reader of this Privacy Policy. This Policy is designed to cover You in Your capacity as a Customer, Employer, Agency User or Agency User acting on behalf of a Candidate.

### What this policy covers

This Privacy and Cookies Policy ("Policy") relates to services provided through Our website, application, and platform ("Services"). This Policy outlines the legal basis upon which all personal data collected from You, or that you provide to Us, is processed by Us. Please read the following carefully to understand Our practices regarding your personal data and how we will treat it. Your visit to the site is also subject to Our Terms of Use, which can be found here (<https://ramp.global/terms-of-website-use/>) and incorporates this Privacy Policy.

#### RAMP Global will:

- Keep Your data safe and private.
- Enable You to easily exercise your subject access rights.

#### RAMP Global will not:

- Misuse Your data in any way that is not consistent with the Data Protection Laws as defined later in this policy.
- Sell your data.

### What if You do not agree with this privacy policy?

If after reading this privacy policy You do not agree to RAMP Global's processing of Your data in the manner outlined in this policy, please do not register with RAMP Global or submit any personal data to Us.

Alternatively, you may contact the RAMP Global team about the topics set out in this privacy policy if You have any questions or require more details on how We use Your personal information.

RAMP Global Contact Information:

Phone number: +44 (0)20 7952 6060

Email Address: [enquiries@ramp.global](mailto:enquiries@ramp.global)

Mailing Address: 1-2 Paris Garden, Bankside, London SE1 8ND

If You are based in the UK, nothing in this policy precludes Your right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). The ICO's address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

If You are based outside of the UK, then nothing in this policy precludes Your right to make a complaint with Your national Data Protection Authority (DPA). If you are not in a jurisdiction governed by the GDPR, then the use of Your information in such situations may be subject to contract, the Agency License Terms, or any agreed Data Protection Agreement.

## **Who is the controller of the data that you provide to Us?**

The controller of data, for the purposes of the Data Protection Laws, is dependent on the circumstances laid out below:

- In respect of the personal data of users of the Services, business contacts and prospects of RAMP Global, the Data Controller is RAMP Global; and
- In respect of the personal data of any candidate who is submitted to the RAMP Global Platform, the Agency User is the Data Controller. RAMP Global will process candidate data in accordance with the Data Protection Laws, for the purpose of facilitating the recruitment process.

## **What information will We collect?**

We collect the following information about You:

- Information that You provide to Us when registering with Us (Identity Data, Contact Data, Financial Data and Profile Data).
- Information that relates to any transactions carried out between You and Us on or in relation to the Services, including information relating to any purchases You make of Our products and services (Transaction Data).
- Information about Your device, Your visits to, and use of the Services. This includes: Your location; IP address; browser; operating system; referral source; length of visit; individual page views; site navigation (Usage Data).
- Information that You provide when subscribing to Our email notifications/newsletters (Marketing and Communications Data).
- Any additional information that You knowingly and freely send to Us e.g. surveys for research purposes.

RAMP Global never collects the following special categories of personal information about You; details about Your religious or philosophical beliefs; sexual orientation; political opinions; any trade union membership; information about health, genetics, and biometric data; criminal convictions or offences.

## **Information collected from other sources.**

We may also obtain personal data from other sources as follows:

- Names and contact details of Customer personnel who will be added as account members for the Customer's account, and can be added by existing account members;
- Names and contact details of an Employer's Recruiters referred to Us by Our customers, can be added by existing account members.
- Names, contact details, previous job history and all other information that may be found within any CV or job application of a prospective candidate submitted by the Agency User, who has obtained the consent to put that application forward. Candidate data may from time to time contain personally identifiable and sensitive information. The use of information in such situations is limited and is governed through The Agency License Terms, which can be viewed on Our website.

- Names and contact details of individual contacts at prospective Customers from third party data providers and/or public sources, such as social networks, company websites and other online sources.

## **How will we use it?**

RAMP Global lawfully collect and use data to pursue Our legitimate interest in the performance of Our contracts with Our Customers. Your personal data will be stored, processed, used, and disclosed by Us in the following ways:

- To provide Our Services to You and to facilitate the recruitment process; and/or
- To pass on CVs/applications to Customer's or Employer's for their consideration; and/or
- To assess data about Agency Users against vacancies posted by Employers which We judge may be suitable for You; and/or
- Where You are a prospective or current Customer, to provide You with information about Our Services for marketing purposes; and/or
- To enable Us to develop and market other products and services and to improve Our customer service and to make Our services more valuable to You (including tailoring our website when you log on to make enrich Your personal online experience); and/or
- To send You details of reports, promotions, offers, networking and client events and general information about the industry sectors which we think might be of interest to You; and/or
- To answer Your questions and enquiries; and/or
- To third parties who perform functions on Our behalf and who also provide services to Us, such as professional advisors, finance and accounting suppliers, IT consultants carrying out testing and development work on Our business systems, CRM / Marketing platforms, outsourcing partners and any Applicant Tracking System used by a Customer or Employer to handle Candidate Data; and/or
- To regulatory or law enforcement agencies if We believe in good faith that We are required by law to disclose it in connection with the detection of crime, the collection of taxes or duties, in order to comply with any applicable law or order of a court of competent jurisdiction, or in connection with legal proceedings; and/or
- To use Your information on an anonymised basis to monitor compliance with Our equal opportunities policy.

## **Disclosure of Information**

From time to time, We may seek Your consent to process, use, or disclose Your information for any other purpose which is not listed above.

We reserve the right to transfer Your information to a third party in the event of a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of Our company provided that the third party agrees to adhere to the terms of this Privacy Policy and provided that the third party only uses Your Personal Data for the purposes that you provided it to Us. You will be notified in the event of any such transfer and You will be afforded an opportunity to opt-out.

## **How do I find out what information RAMP Global holds? Can I amend, modify or request my information to be deleted?**

Under the Data Protection Laws, You have a number of important subject access rights, which are available to You free of charge. In summary, this includes rights to:

- Access Your personal data and certain other supplementary information that this Policy is already designed to address; and/or
- Require Us to correct any mistakes in your information which We hold; and/or

- Require the erasure of personal data concerning You in certain situations; and/or
- Receive the personal data concerning You which You have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations; and/or
- Object at any time to processing of personal data concerning you for direct marketing; and/or
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you; and/or
- Object in certain other situations to Our continued processing of your personal data; and/or
- Otherwise restrict Our processing of your personal data in certain circumstances; and/or
- Claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner’s Office (ICO) on individual’s rights under the General Data Protection Regulation (<https://ico.org.uk/for-the-public/>).

If You would like to exercise any of those rights, please:

- Contact Us using Our Contact details provided above
- Provide Us with enough information to identify you. Where You are a user of Our Services You should email Us from the email address that you used to register with RAMP Global. Receipt of an email from this address will usually be sufficient to confirm Your identity. In all other cases We may request one or more identification documents, such as a copy of Your driving licence or passport and a recent utility or credit card bill; and
- Let Us know the information to which Your request relates.

## **Can I unsubscribe from RAMP Global’s services?**

You may request to unsubscribe or manage Your subscription preferences from RAMP Global and marketing material at any time. RAMP Global will always honour Your stated subscription preferences. If You wish to contact Us with respect to the above matters, please use Our contact details.

## **How long will RAMP Global hold my information for?**

We keep Your personal information only so long as we need it to provide Our Services to you and fulfil the purposes described in this Policy. This is also the case for anyone that we share Your personal information with who carries out services on Our behalf.

Retention periods can vary significantly based on the type of information and how it is used. Our retention periods are based on necessity. Our criteria includes, but is not limited to, legally mandated retention periods, whether there is pending or potential litigation, Our intellectual property or ownership rights, contract requirements, operational directives or needs, and historical archiving. When We no longer need to use Your personal information and there is no need for Us to keep it to comply with Our legal or regulatory obligations, resolve disputes and enforce Our agreements, We’ll either remove it from Our systems or depersonalize it so that We can’t identify You.

We will use reasonable endeavours to ensure that Your Personal Data is minimised, maintained, and up to date. However, You are under a duty to inform Us of any and all changes to Your Personal Data to ensure that it is up to date and We will update or delete Your Personal Data accordingly.

## **Security and Safeguards**

### **Security**

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way, for the

duration of Your use of Our Services. We limit access to Your personal data to those who have a genuine business need to know it. Those processing Your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so.

### **Where we store Your personal data**

The data we collect from You and process when You use our Services may be transferred or stored in a destination outside of the European Economic Area (“EEA”). It also may be processed by staff outside of the EEA. RAMP Global will only transfer or store data with either i) the express consent of the data subject or an authorised representative of the data subject, or, ii) to or in a location that ensures an adequate level of protection as recognised by the EU’s adoption of an adequacy decision.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do Our best to protect Your personal data, we cannot guarantee the security of Your data transmitted to the Website. Therefore, any transmission remains at Your own risk. Once We have received Your information, We will use strict procedures and security features to prevent unauthorised access.

### **How we collect and aggregate information about visitors to Our websites**

When You use Our Services, Your device is automatically providing information to Us so we can respond and customize Our response to you. The type of information We collect by automated means generally includes technical information about Your computer, such as Your IP address or other device identifier, the type of device You use, and operating system version. The information We collect also include usage information and statistics about Your interaction with the Platform. That information includes the URLs of Our web pages that you visited, URLs of referring and exiting pages, page views, time spent on a page, number of clicks, platform type, location data (if you have enabled access to Your location on Your mobile device), and other information about how You used the Platform.

### **Cookies**

A cookie is a small data file which is sent from a web server to a web browser when that browser visits the server’s site.

Technologies such as: cookies, Local Storage, Session Storage, web beacons, locally shared objects (sometimes called “flash cookies”), mobile identifiers and similar technologies (“Cookies”) are used by TheJobPost and Our partners (such as advertising, marketing and analytics providers) (“Ad Partners”). We use Cookies to remember Customer’s settings as well as for authentication and analytics. These technologies can be used in analysing trends, administering the Platform, tracking users’ movements around the Platform and to gather demographic information about Our customer base as a whole.

You can control the use of Cookies at the individual browser level, but if You choose to disable Cookies, it will limit Your use of certain features or functions on Our website or service. For more information on Cookies, how We use them, the third parties We work with who use them, and how You can control them, please see the below.

We use Cookies for the following:

#### **Authentication**

We use Cookies to help Us determine whether or not You’ve signed in to the Platform and to keep You signed in during visits as You access different pages.

#### **Security**

We use Cookies to enable and support security features, prevent fraud, and protect Your data from unauthorized access.

### **Preferences and Features**

We use Cookies to enable features, help Us provide You with personalized content such as showing You Your recent search activity.

### **Advertising**

We use Cookies to deliver, evaluate and improve advertising, such as by using information about you to provide relevant advertising both on and off the Platform. Our Ad Partners can use a cookie to determine whether you've already been shown an advert or how it performed, or provide Us with information about how you interacted with an ad.

### **Analytics and Performance**

We use Cookies to analyse how Our visitors use the Platform and to monitor site performance. These Cookies help Us to identify and fix errors, understand, and improve services, research, and test out different features, and monitor how Our visitors reach Our sites.

### **Links to other websites**

Please note that clicking on links and banner advertisements and RSS feeds may result in Your transfer to another website, where data privacy practices may be different to this privacy policy. It is Your responsibility to check other website privacy policies to ensure that You are happy for Your personal information to be used in accordance with those third parties privacy policies. We accept no responsibility for and have no control over third party websites, links, adverts or RSS feeds or information that is submitted or collected by third parties.

### **Changes to Our Privacy Policy**

Any changes to this Privacy Policy will be posted on Our website so you are always aware of what information We collect, how we use it, and under what circumstances, if any, we disclose it. If at any time We decide to use Personal Data in a manner significantly different from that stated in this Privacy Policy, or otherwise disclosed to You at the time it was collected, We will notify You by email, and You will have a choice as to whether or not We use Your information in the new manner.

**END**