



PRIVACY STATEMENT

Careers-Action is a registered UK Charity (No. 1165296). The purpose of the charity is to assist managers, technical and professional people and newly qualified graduates to get into work when they have left university or their last employment for some reason. To become a member of Careers-Action you must sign up for membership so that we can help you in the best ways.

SOCIAL INTERACTION

OUR PRIVACY PLEDGE

Our commitment is to put members first. We strive to be transparent about how we collect and use your information, to keep your information secure and to provide you with meaningful choices. Although some of our website information might be useful outside the UK we do not take membership from outside unless the member can declare that they are moving to the UK. This Privacy Policy is intended to help you understand what information Careers-Action collect, why we collect it and what we do with it.

This Privacy Policy does not apply to the practices of affiliates or companies that Careers-Action does not own or control.

YOUR CONTROLS & PRIVACY RIGHTS

We believe that you should have control of your information. You can review or edit your account information, including your marketing preferences, location data, mobile choices, advertising settings and search history, and account deletion controls by visiting unsubscribing. Some of our Services may provide additional controls.

In many cases where we process your information, you may also have a right to restrict or limit the ways in which we use your information. In certain circumstances, such as those described in the 'legitimate interests' section above, you also have the right to object to the processing of your information by us.

You can also request the rectification of your information by us. You can request that we delete your information, and Careers-Action will carry out this request unless certain exceptional reasons arise permitting Careers-Action to keep certain information about you.

You also have the right to obtain a copy of your information in an easily accessible format. In certain circumstances, you can also request that we transfer some of your information to third parties. Careers-Action will help you exercise these important rights.

WITHDRAWING CONSENT

You have the right to withdraw your consent to our processing of your information and your use of our Services at any time. Similar to the way in which you can give consent by interacting with our Services, you can also withdraw your consent through our Services. You can choose to delete your Careers-Action membership via your account settings and we will delete your information.

If you withdraw your consent to the use or sharing of your information for the purposes set out in this Privacy Policy, you may not have access to all (or any) of our Services and we might not be able to provide you with all (or any) of the Services under this Privacy Policy and our membership. In certain cases, we may continue to process your information after you have withdrawn consent if we have a legal basis to do so, or if your withdrawal of consent was limited to certain processing activities. For example, we may keep information if we need to do so to comply with a legal obligation, to resolve disputes and to enforce our agreements.

INFORMATION COLLECTION AND USE – GENERAL



PRIVACY STATEMENT

Certain categories of information collected by Careers-Action are necessary to use our Services, such as the information you must provide when registering for some Services. We may collect and combine information when you interact with Careers-Action Services including information outlined below

- **Information that you provide to us.** We collect the information you provide to us in order to enable us to operate and provide our Services, including:
 - When you create a membership account with Careers-Action. (please note that, when you use our Services, we may recognise you or your devices even if you are not signed in to our Services.)
 - Careers-Action may use device IDs, cookies and other signals, including information obtained from third parties, to associate accounts and/or devices with you.
 - When you use our Services to communicate with others or post, upload or store content (such as comments, photos, voice inputs, videos, emails, messaging services and attachments).
 - When you otherwise use our Services, such as view the website content that we make available, perform search queries or install any Careers-Action software such as plug-ins.
 - When you sign up for paid Services, use Services that require your financial information or complete transactions with us or our business partners, we may collect your payment and billing information in order to provide you with those paid Services. We may remember the payment information that you entered during a prior purchase for paid Services and provide you with the option to use that payment information during the purchase of a new product.
- **Device information.** We collect information from your devices (computers, mobile phones, tablets, etc.) in order to provide you with our Services, including information about how you interact with our Services and those of our third-party partners and information that allows us to recognise and associate your activity across devices and Services. This information includes device-specific identifiers and information such as IP address, cookie information, mobile device and advertising identifiers, browser version, operating system type and version, mobile network information, device settings and software data.
- **Location information.** We collect location information from a variety of sources. You can learn more about and manage your location permissions on our Locations page or by visiting the location settings tool on your devices.
- **Information from cookies and other technologies.**
 - We collect information when you access content, advertising, sites, interactive widgets, applications and other products (both on and off our Services) where Careers-Action data collection technologies (such as web beacons, development tools, cookies and other technologies, etc.) are present. These data collection technologies allow us to understand your activity on and off our



PRIVACY STATEMENT

Services and to collect and store information when you interact with Services we offer to partners.

- This information includes the kind of content or ads served, viewed or clicked on; the frequency and duration of your activities; the sites or apps you used before accessing our Services and where you went next; whether you engaged with specific content or ads; and whether you went on to visit an advertiser's website, downloaded an advertiser's app, purchased a product or service advertised or took other actions.
- **Information from others.** We collect information about you when we receive it from other users, third parties and affiliates, such as:
 - When you connect your account to third-party services or sign in using a third-party partner (such as Facebook or Twitter).
 - From publicly available sources.
 - From advertisers about your experiences or interactions with their offerings.
 - When we obtain information from third parties or other companies, such as those that use our Services. This may include your activity on other sites and apps as well as information that those third parties provide to you or us.

HOW WE USE THIS INFORMATION

We mainly rely on three separate bases to lawfully process your information. First, we need to process your information in certain ways to provide our Services to you, in accordance with our Terms of Service. This processing is necessary to perform the contract between you and us, and our membership rules make it clear that processing of your information for the purposes of personalised content is a necessary part of the Services we provide. Second, where you have given us consent to use your information in certain ways, we will rely on your consent. Third, as described in more detail below, in certain cases, we may process your information where necessary to further our legitimate interests, where those legitimate interests are not overridden by your rights or interests. Occasionally, Careers-Action may rely on other legal bases to process your information such as to protect a user's vital interests (such as where there is a risk of imminent harm) or to comply with a legal obligation.

In order to deliver, personalise and improve our Services, we combine and use the information that we have about you (including information we receive on and off our Services) to understand how you use and interact with our Services and the people or things that you're connected to and interested in. As membership to Careers-Action lower levels is free, occasionally Careers-Action may allow adverts to run on our systems to help raise the money to operate the service. We may also use the information we have about you in the following ways and for the following purposes:

- To provide, maintain, improve and develop relevant features, content and Services.
- To analyse your content and other information (including incoming and outgoing emails, instant messages, posts photos, attachments and other communications) in order to keep our Services safe and secure and to assist us in making the content, Services and ads we provide to you more personalised. You can review and control certain types of information tied to your Careers-Account account by using Privacy Controls.
- To fulfil your requests and when authorised by you.



PRIVACY STATEMENT

- To help advertisers and publishers connect to offer relevant advertising in their apps and websites.
- To match and serve targeted advertising (across devices and both on and off our Services) and provide targeted advertising based on your device activity, inferred interests and location information.
- To contact you with information about your account or with marketing messages, which you can also control.
- To associate your activity across our Services and your different devices as well as associate any accounts you may use across Careers-Action Services together. We may associate activity and accounts under a single user ID.
- To carry out or support promotions.
- To conduct research and support innovation.
- To create analytics and reports for external parties, including partners, publishers, advertisers, apps, third parties and the public regarding the use of and trends within our Services and ads, including showing trends to partners regarding general preferences, the effectiveness of ads and information on user experiences. These analytics and reports may include aggregate or pseudonymised information, but do not include any information relating to an identified or identifiable user.
- To provide location-based Services, advertising, search results and other content consistent with your location settings.
- To combine information that we have about you with information that we obtain from business partners or other companies, such as your activities on other sites and apps in order to ensure that the ads, Services and content we provide to you are more suited to your interests.
- To detect and defend against fraudulent, abusive or unlawful activity and to keep our Services safe and secure.

We provide you with controls to manage your experience with us. For example, you can review or edit your account information, manage your marketing preferences or opt out of targeted ads. While personalised ads are necessary for the purposes of our legitimate interests and are a necessary part of our agreement with you, we offer you the ability to object to certain personalised ads through your choices to opt out of certain targeted ads. If you object through this opt-out, you will continue to see ads, but they may not be as relevant or useful to you.

HOW WE SHARE THIS INFORMATION

Careers-Action may share information within its trainers in order for trainers to provide services direct to the members if that is required by the member. We also share information that we have about you in accordance with this Privacy Policy, including to provide Services that you have requested (including when you connect to third-party apps and widgets). We do not sell, license or share information that individually identifies our customers with companies, organisations or individuals outside of Careers-Action unless one of the following circumstances applies:

- **With your consent.** We will share information with companies, organisations or individuals outside of Careers-Action when we have your consent.



PRIVACY STATEMENT

- **Within Careers-Action.** Information may also be shared within Careers-Action, including with other Careers-Action trainers and affiliates. Careers-Action affiliates may use the information in a manner consistent with their privacy policies.
- **With partners.** We may share your information with non-affiliated companies who are:
 - **Trusted partners.** We provide user information to trusted partners who work on behalf of Careers-Action based on our directions and in compliance with appropriate confidentiality measures. Learn more.
 - **Advertising, analytics and business partners (limited to non-personally identifiable information).** We may share aggregated or pseudonymous information (including demographic information) with partners, such as publishers, advertisers, measurement analytics, apps or other companies. For example, we may tell an advertiser how its ads performed or report how many people installed an app after seeing a promotion. We do not share information that personally identifies you (personally identifiable information includes your name or email address) with these partners, such as publishers, advertisers, measurement analytics, apps or other companies. When you use third-party apps, websites or other products integrated with our Services, they may collect information about your activities subject to their own terms and privacy policies. We allow other companies that show advertisements on our web pages or apps to collect information from your browsers or devices. Other companies' use of cookies and other data collection technologies are subject to their own privacy policies, not this one. Like many companies, we may allow cookie matching with selected partners. However, these parties are not authorised to access Careers-Action cookies.
- **For legal purposes.** We may access, preserve and disclose information to investigate, prevent or take action in connection with: (i) legal processes, and legal and governmental agency requests; (ii) enforcement of the Terms; (iii) claims that any content violates the rights of third parties; (iv) requests for customer service; (v) technical issues; (v) protecting the rights, property or personal safety of Oath, its users or the public; (vi) establishing or exercising our legal rights or defending against legal claims; or (vii) as otherwise required by law.
 - This may include responding to lawful governmental requests. Learn more about how we evaluate and respond to these requests.
- **New ownership.** If the ownership or control of all or part of Careers-Action or a specific Service changes as a result of a merger, acquisition or sale of assets, we may transfer your information to the new provider.

DETAILS FOR SPECIFIC PRODUCTS AND SERVICES

Additional privacy practices for certain Careers-Action Services are included here.



PRIVACY STATEMENT

INFORMATION SECURITY AND DATA RETENTION

Careers-Action has technical, administrative and physical safeguards in place to help protect against unauthorised access, use or disclosure of customer information that we collect or store.

If Careers-Action will retain your information only for as long as is necessary for the purposes set out in this Privacy Policy, for as long as your Careers-Action account is active or as needed to provide you with the Services. you no longer want Careers-Action to use your information to provide you with the Services, you can close your account and Careers-Action will delete the information it holds about you unless Careers-Action needs to retain and use your information to comply with our legal obligations, to resolve disputes or to enforce our agreements.

LEGITIMATE INTERESTS

Careers-Action may use your information to provide, improve and customise our Services and the ads and content that we serve to you. This may include the sharing of your information for such purposes as is necessary to pursue our legitimate interests and your legitimate interests in receiving personalised content and services. Using and sharing your information for such purposes is also necessary to enable us to pursue our legitimate interests of understanding how our Services are being used and of developing ways to change our Services so they are more exciting and interesting for you and other users. Using your information for the reasons described in this Privacy Policy is also necessary to allow us to pursue our legitimate interests of improving our Services, obtaining insights into usage patterns of our Services, efficiency and interest of our Services for users.

Careers-Action may also use your information for safety and security purposes, including the sharing of your information for such purposes as is necessary to pursue our and your legitimate interests of ensuring the security of our Services, including enhancing users' protection against harassment, IP infringement, spam, and crime and security risks of all types.

You have the right to object to any of this processing and, if you want to object, please complete an objection form available [here](#).

DATA PROCESSING AND TRANSFERS

When you use or interact with any of our Services, you consent to the data processing, sharing, transferring and uses of your information as outlined in this Privacy Policy. You authorise us to transfer, process, store and use your information in countries other than your own in accordance with this Privacy Policy and to provide you with Services.

Careers-Action only operates in the Milton Keynes area at the moment and so will not transfer your data outside the UK without your knowledge and permission.

Contractual necessity. You can choose whether or not you want to use our Services. However, if you want to use our Services, you need to agree to our Membership terms, which set out the terms of the contract between us and you. These are stated on our membership form. We cannot provide you with our main services without you agreeing to the membership terms and this Privacy Policy.



PRIVACY STATEMENT

OTHER IMPORTANT INFORMATION

This Privacy Policy applies only to Careers-Action.

This Privacy Policy does not apply to the practices of companies that Careers-Action does not own or control, or to people that Careers-Action does not employ or manage. In addition some affiliated products may have different privacy policies and practices that are not subject to this Privacy Policy.

CHANGES

We may amend or update this Privacy Policy from time to time, so you should check it periodically. If we make changes of a material nature, we will provide you with appropriate notice before such changes take effect.

QUESTIONS & SUGGESTIONS

If you have questions or suggestions relating to your information, or wish to make a complaint, please complete a feedback form, or contact us at:

Customer Care - Privacy Policy Issues
Careers-Action
42 Trueman Place
Oldbrook
Milton Keynes
MK6 2HH

Without prejudice to any other rights you may have, you also have the right to file a complaint against us with the Irish Data Protection Commissioner, which is Careers-Action lead supervisory authority for data protection.

Approved by : Melvin Hurley Chief Executive Officer

Signed :  **Date :** 18 May 2018