



## External - Privacy Policy

### (Independent Contractors, Prospective Employees, Prospects & Commercial Requests)

**Date of Policy:** May 2018

**Date of Review:** May 2019

#### Policy Statement

Yomdel, are committed to protecting and respecting your privacy. We understand that you care about the use and storage of your Personal Data which is why we have created this privacy policy in order to demonstrate our commitment to your privacy. The policy aims to help you to understand what information we might collect, use, share, and keep about you, and may change from time so please check back here frequently.

This policy applies to anyone emailing or telephoning the Company or any visitors to our public websites, including [www.yomdel.com](http://www.yomdel.com), or any of our client survey sites, ('our Sites'), who:

- Request information by email or telephone
- Apply for one of the vacancies at the Company
- Sign up an Independent Contractors ('Independent Contractors') to provide mystery shopping or research services

We may collect and process the following data about you ("Personal Data"). The legal definition of Personal Data varies by location and only the legal definition that applies in your physical location will apply to you under this privacy policy.

Please read this policy carefully to understand our practices regarding your Personal Data and how we will treat it. If you disagree with any of the terms of this Privacy Policy, you should immediately cease the use of the Sites, or can contact us directly. This policy may vary from time to time so please check it regularly. Any significant changes to this policy will be clearly highlighted on this page.

Information relating to Employee and Client's Personal Data are located in separate documents and are supplied where relevant. All Independent Contractors must agree to the Independent Contractors Terms and Conditions before completing any work for the Company which details more specific use of Personal Data in relation to a Project Assignment.

#### Information We May Collect from You

##### **Independent Contractors**

The personal information you give us during your registration may include your first and last name, address, email address, phone number and date of birth. During the registration process, we will capture your IP address. If you contact us by mail, email, web or phone, we may keep a record of that correspondence. When you apply to register with us a Mystery Shopper or Researcher, we may use the information we collect from you to:

- consider your suitability to perform those services;
- include you on our list of mystery shoppers;
- manage your account;
- collect and maintain historical information about your mystery shopping assignments and payments and administer payments;
- carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;

With the exception of IP address, processing is necessary for the performance of the Independent Contractor agreement that exists between us, or in order to take steps at your request prior to entering into a contract. The processing of IP address is necessary for the purposes of the legitimate interests pursued by us, specifically for the purposes of security and fraud prevention. Your profile is stored on our servers (which is within the EEA). Your profile is available to our employees with a legitimate business need.

### **Prospects and Commercial Requests**

When you download marketing collateral or contact us to schedule a briefing, we collect and maintain Personal Data so we can include you in our marketing database, comply with your request, and send you information on our products and services. Personal Data we collect for these purposes usually include your name and contact information. Where you contact us by phone, we may also keep a copy of that correspondence. You may unsubscribe from our emails at any time by clicking on the "unsubscribe" link in the emails you receive from us. We may use information we collect from you to:

- provide you with the information requested;
- provide you with information that is similar to those that you have already enquired about;
- notify you about changes to our service

Your full prospect profile is stored on our servers (which are within the EEA), Your profile is available to our employees with a legitimate business need such as the Marketing Team.

### **Prospective Employees**

When you apply to work for us as an Employee, we will collect your Personal Data, as supplied by you. This information will be used to:

- consider your suitability to perform a specific role;
- include you on our shortlist of candidates;
- consider you for other suitable employment roles available either now or within next 6 months.

Your Personal Data is stored on our servers (which is within the EEA), and is available to our employees with a legitimate business need to evaluate your job application.

### **Special Categories of Data**

We do not request or require you to provide any special categories of Personal Data including for example genetic data, biometric data for the purpose of uniquely identifying a natural persona, or information relating to your racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, or sexual orientation. If we become aware of any such data having been submitted to us, we will, where reasonably practicable, endeavour to delete it.

### **Cookies**

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device. The cookies used on this website have been categorised based on the categories found in the ICC UK Cookie guide. A list of all the cookie types used on this website by category is set out below:

- Strictly necessary cookies – these cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for cannot be provided.
- Performance cookies – these cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

Google Analytics – 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. You can opt out of Google Analytics, via their website.

### **Third Party Websites**

Our Site may, from time to time, contain links to and from the websites of our partners. If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own Privacy Policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

### **Social Media Features**

Our Sites includes features from social media websites, such as the Facebook like button. These features may collect your IP address, which page you are visiting on our Site, and may set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on our Site. This privacy policy does not apply to these features. Your interactions with these features are governed by the Privacy Policy and other policies of the companies providing those features.

### **Where We Store Your Personal Data**

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We will store all the personal information you provide on our secure (password and firewall protected) servers. Our server is located within the EEA and we have in place anti-virus or malware protection and system integrity tools to further protect data stored on these databases.

The transmission of information via the Internet is not secure. Although we will do our best to protect your Personal Data, we do not encrypt email messages and cannot guarantee the security of your data transmitted to our Sites; any transmission is at your own risk. We have implemented a variety of technical and organizational measures to protect Personal Data from loss, misuse, unlawful processing, unauthorized access, disclosure, copying, alteration and destruction. These include limiting access to the databases to a limited number of authorized staff; access to the databases is password protected. We also have in place anti-virus or malware protection and system integrity tools to further protect data stored on these databases.

The Personal Data stored by us may be accessed and processed by staff operating outside your jurisdiction, who work either for us or for one of our suppliers. These staff may be engaged in the fulfilment of your request, order or reservation, the processing of your payment details and the provision of support services to us. We will take all steps required by applicable law to ensure that your data is treated securely and in accordance with this privacy policy and applicable law.

### **Data Retention**

The amount of time we hold your Personal Data will vary but shall be kept for no longer than is necessary for the purposes for which it is being processed. We will retain your Personal Data in accordance with the following criteria:

**Independent Contractors** - We will retain your Personal Data indefinitely whilst you are actively completing mystery shopping assignments for us. When you stop actively completing mystery shopping assignments, we will 'archive' your profile. Any Independent Contractor profile that has not had any contact attempts from the Company for a period of 3 years will be 'archived'. We are required to hold all Client results and assets you have delivered to us for a period 12 months, unless otherwise agreed with our Client. After this period all results and assets will be removed from our systems.

**Prospects & Commercial Requests** - We will retain your Personal Data for as long as necessary to provide you with the information requested or with information similar to those that you have already enquired about, or until you opt out of receiving marketing communications.

**Prospective Employees** - CVs/Job Applications submitted to the Company will be reviewed by the HR team. If your application is not being progressed any further, then all electronic details will be deleted, and any paper copies will be shredded. This will be done within 3 days of being the candidate being deemed unsuitable. For applicants that are not successful for the role applied for (or those that have sent in a speculative application) but are deemed of interest to the Company for other future roles, the Company will notify by email that this is the case. In these instances, the Company will retain the personal data for a period of 6 months. After 6 months, your electronic details will be deleted, and any paper copies will be shredded. This will be done within 3 days of it being decided not to pursue the application any further.

### Amending Your Data

If the personal data which we hold about you needs to be corrected or updated, then please let us know and we will make any changes with 3 working days of your request being received.

### Removing Your Data

If you decide to be removed from our system, we will respond to your request within 3 working days at which point your profile will be 'archived'. This archival will retain some restricted Personal Data in order to respond to any requests, support or defend any claims, and provide evidence of financial transactions in accordance with statutory retention periods.

### Subject Access Requests

You may instruct us to provide you with any personal information we hold about you. If so please write or email us (see below), using Subject Access Request within the title. We will handle your enquiry within 28 days of request of your request. We will acknowledge all requests received within 3 working days.

### Your Rights

We ensure that you have certain rights in relation to the Personal Data we process. The General Data Protection Regulation came into effect in May 2018. Included within the Regulations the following are applicable to individuals and their rights over personal data supplied to us;

- a) Complaints can be made to the supervisory authority which in the UK is the Information Commissioners Office.
- b) Individuals can withdraw their personal data at any time by contacting the Company
- c) Individuals may access their personal data, have it rectified or erased by contacting our Company
- d) If we implement any automated personal data processing (including profiling) we will advise the individuals affected.
- e) An individual may object to certain types of processing e.g. direct marketing and decisions based solely on automated processing
- f) Personal data will only be held for as long as there is a legitimate need.
- g) Details in respect of our Data Compliance Officer can be provided on request.

## Complaints

If you have any complaint regarding this privacy policy or how your data is being held, used or processed, you should first contact The Managing Director, whose contact details are as follows:

- Yomdel, Parbrook House, Natts Lane, Billingshurst, West Sussex, RH14 9EZ
- [projects@yomdel.com](mailto:projects@yomdel.com)
- 01403 616 000

In the event an EU user is still concerned that the Company is not complying with their obligations under the GDPR and is not handling their data responsibly and in line with good practice, then they may raise a concern with the UK Information Commissioner's Office. The ICO can report a concern online here, <https://ico.org.uk/concerns/handling/> or by phone on 0303 123 1113.

## Contact

If you have any questions about this privacy policy or our treatment of your personal data, please write to us:

- Yomdel, Parbrook House, Natts Lane, Billingshurst, West Sussex, RH14 9EZ
- [projects@yomdel.com](mailto:projects@yomdel.com)
- 01403 616 000