

ANYGOOD? PRIVACY POLICY

Your personal information

This privacy policy explains how we collect and process your personal data. Personal data, or personal information, means any information about an individual from which that person can be identified. This includes information that you tell us, what we learn from you and the choices you make about the marketing you want us to send to you. This policy explains how we do this, what your rights are and how the law protects you.

We do not knowingly collect data relating to children.

Changes to data protection law

The law in relation to data protection is changing on the 25 May 2018 when the General Data Protection Regulation comes into force in the United Kingdom and across Europe.

This privacy policy tells you about most of your rights under the new law, but we may need to update it again before the 25 May 2018.

There may also be further changes which we will be required to make to this privacy policy after the 25 May – we will notify you every time we make a change to this policy. We may need to ask you to agree to the changes, or refresh your consent to us using your personal information.

1. Who we are and how you can contact us

We are Stride Consultants Limited trading as Anygood?. Our registered office is at 3 Waterhouse Square, 138 Holborn, London, EC1 2SW.

You can contact us by email at admin@anygood.com . If you need to you can write to us at our registered office address.

Our representative for all queries in relation to this policy and your data protection rights is Carl Webber.

When we refer to our website, we mean our website at www.anygood.com .

2. Where we collect your personal information from

We may collect personal information about you in the following ways:

Data you give to us:

- When you register to use our goods and services, such as through our registration form
- When you talk to us on the phone
- When you use our website or mobile device apps
- In emails or letters to us
- If you take part in our competitions or promotions
- When you give us feedback

Data we collect when you use our goods and services:

- Payment and transaction data
- Profile and usage data, including data we gather from the devices you use to connect to those services such as computers and mobile phones, using cookies

(please see our separate cookies policy found at <https://anygood.com/cookie-policy/>) and other internet tracking software

Data from third parties we work with:

- Companies or individuals that introduce you to us
- Credit reference agencies
- Social networks
- Public information sources, such as Companies House, LinkedIn, Facebook, internet searches
- Agents working on our behalf, such as third party recruiters
- Members (as defined below)
- Government and law enforcement agencies

3. Data we collect about you

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

CATEGORIES OF DATA	DESCRIPTION OF DATA
If you are a Client¹, we collect the following data about you:	
Identity Data	First name, last name, username, marital status, title, date of birth, gender, title
Contact Data	Email address, telephone number, mailing address
Financial Data	Sort Code and Bank account details
Technical Data	Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website
Profile Data	Your username and password, feedback and

¹ A company or individual looking to hire a Candidate through the AnyGood? platform and who has signed up to our terms and conditions.

	survey responses
Usage Data	Information about how you use our website, platform and services
Marketing and communications data	Your preferences in receiving marketing from us and our third parties and your communication preferences.
If you are a Member², we collect the following data about you:	
Identity Data	First name, last name, username, marital status, title, date of birth, gender, title
Contact Data	Email address, telephone number, mailing/billing address
Financial Data	Bank account and payment card details
Transaction Data	Details about payments to and from you and other details of services you have purchased from us
Technical Data	Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website

² A company, individual or agent making recommendations of suitable Candidates for a Client role through the Anygood? platform and who has signed up to our terms and conditions.

Profile Data	Your username and password, feedback and survey responses
Usage Data	Information about how you use our website, platform and services
Marketing and communications data	Your preferences in receiving marketing from us and our third parties and your communication preferences.
If you are a Candidate³, we collect the following data about you:	
Identity Data	First name, last name, username, marital status, title, date of birth, gender, title
Contact Data	Email address, telephone number, mailing address
Profile Data	Your username and password, feedback and survey responses, any of your personal data included in your curriculum vitae provided to us or uploaded on our platform, such as education details
Technical Data	Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website

³ An individual who is interested in being shortlisted for a Client job, has made his/her curriculum vitae available on AnyGood?'s platform and who has signed up to our terms and conditions.

Usage Data	Information about how you use our website, platform and services
Marketing and communications data	Your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any special categories of personal data about you. This includes details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

4. How we use your personal information

Your privacy is protected by law.

We are only allowed to use personal information about you if we have a legal basis to do so, and we are required to tell you what that legal basis is. We have set out in the table below: the personal information which we collect from you, how we use it, and the legal ground on which we rely when we use the personal information.

In some circumstances we can use your personal information if it is in our legitimate interest to do so, provided that we have told you what that legitimate interest is. A legitimate interest is when we have a business or commercial reason to use your information which, when balanced against your rights, is justifiable. If we are relying on our legitimate interests, we have set that out in the table below.

What personal information we collect <i>(Please refer to the description of each category in the table above)</i>	What we use your personal information for	Our legal grounds for processing	Basis of our legitimate interests (if applicable)

<ul style="list-style-type: none"> • Identity • Contact • Profile • Transaction • Financial 	To register you as a Client, Member, or Candidate.	Performance of a contract with you.	n/a
<ul style="list-style-type: none"> • Identity • Contact • Profile 	To set up and maintain your account/profile with us.	Performance of a contract with you.	n/a
<ul style="list-style-type: none"> • Identity • Contact • Transaction • Financial 	To manage payments or collect and recover money owed to us.	Performance of a contract with you.	n/a
<ul style="list-style-type: none"> • Identity • Contact • Profile (mainly the curriculum vitae) 	To validate your suitability and to pass on information to a Client, Member, or Candidate pursuant to our contract.	Performance of a contract with you.	n/a
<ul style="list-style-type: none"> • Identity • Contact • Profile 	To manage our relationship with you, including notifying you about changes to our terms or privacy notices.	<ul style="list-style-type: none"> • Performance of a contract with you. • Necessary to comply with a legal obligation. 	n/a
<ul style="list-style-type: none"> • Technical • Usage 	To administer and protect our business and our website.	Legitimate interests.	Running our business, provision of administration and IT services, network security.

<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Technical 	To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	Legitimate interests.	To study how you use our services, to develop them, to grow our business and to inform our marketing strategy.
<ul style="list-style-type: none"> • Profile • Technical • Usage 	To use data analytics to improve our website, services, marketing, customer relationships and experiences.	Legitimate interests.	To define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy.
<ul style="list-style-type: none"> • Identity • Contact • Profile • Technical • Usage • Marketing and communications 	To make suggestions and recommendations to you about goods or services that may be of interest to you.	Legitimate interests.	To develop our services and grow our business.

5. Who we share your personal information with

We may share your personal information with any of the following organisations, for the purposes of providing the goods and services which you have requested from us:

- Agents and advisers that we use
- Clients (as defined above)
- Companies that we have a joint venture agreement with
- Third party technical partners that provide services for the website and our online platforms, such as Geeks Ltd and Dropbox Inc.
- Our affiliate marketing partner, currently HubSpot Inc. and MailChimp (or such other marketing partner as appointed by us from time to time)

You can find details of how these third parties use your personal information by looking at their privacy policies, all of which should be available on the relevant websites, or on request.

We require all organisations who we share your data with to respect the security of your personal data and to treat it in accordance with the law. We do not allow any of our service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Failing to provide personal data

Where we need to collect personal data 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 (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

7. Third party links

Our website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice or policy of every website you visit.

8. Transferring your personal information outside the EEA

The EEA is the European Economic Area, which consists of the EU Members States, Iceland, Liechtenstein and Norway. If we transfer your personal information outside the EEA we have to tell you.

We will only send your data outside the EEA if:

- (a) You have instructed us to do so
- (b) To comply with a legal duty
- (c) To enable us to perform our contract with you.

If we do transfer your personal information outside the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- (i) We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- (ii) Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- (iii) Where we use providers based in the US, we may transfer to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shares between Europe and the US.

9. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator (including the ICO) of a breach where we are legally required to do so.

10. How long do we keep your personal information

We will keep your personal information for as long as you are our customer.

After you stop being a customer, because you have stopped regularly using our services or platform, we may keep your personal information for up to 6 years for one of the following reasons:

- To respond to any questions or complaints from you
- To maintain our records
- To comply with laws applicable to us

In some cases we may anonymise your personal data (so it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

11. Marketing

We may use your personal information to tell you about relevant goods or services and any upcoming offers.

We can only use your personal information to send you marketing messages if we have either your consent or a legitimate interest to do so.

You can ask us to stop sending you marketing messages or messages inviting you to join our platform at any time – you just need to contact us, or use the opt-out links on any marketing or invitation message sent to you.

We will get your express opt-in consent before we share your personal data with any company other than us for marketing purposes. You can ask a third party company to stop sending you marketing messages at any time, by adjusting your marketing preferences in relation to that company or by using the opt-out links on any marketing message sent to you.

Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of purchasing our goods or services or any other transaction between you and us.

12. Your rights

You have certain rights which are set out in the law relating to your personal information. The most important rights are set out below.

Getting a copy of the information we hold

You can ask us for a copy of the personal information which we hold about you, by writing to us at admin@anygood.com . This is known as a data subject access request.

You will not have to pay a fee to access your personal data, unless we believe that your request is clearly unfounded, repetitive or excessive. In such circumstances we can charge a reasonable fee or refuse to comply with your request.

We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month and in that case we will notify you and keep you updated.

Telling us if information we hold is incorrect

You have the right to question any information we hold about you that you think is wrong or incomplete. Please contact us at admin@anygood.com if you want to do this and we will take reasonable steps to check its accuracy and, if necessary, correct it. Alternatively, you may be able to amend such information through the account that you hold with us.

Telling us if you want us to stop using your personal information

You have the right to:

- object to our use of your personal information (known as the right to object); or
- ask us to delete the personal information (known as the right to erasure); or
- request the restriction of processing; or
- ask us to stop using it if there is no need for us to use it (known as the right to be forgotten).

There may be legal reasons why we need to keep or use your data, which we will tell you if you exercise one of the above rights.

Withdrawing consent

You can withdraw your consent to us using your personal information at any time. Please contact us at admin@anygood.com if you want to withdraw your consent. If you withdraw your consent, we may not be able to provide you with certain products or services.

Request a transfer of data

You may ask us to transfer your personal information to a third party. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

13. Making a complaint

Please let us know if you are unhappy with how we have used your personal information by contacting us at admin@anygood.com .

You also have a right to complain to the Information Commissioner's Office. You can find their contact details at www.ico.org.uk. We would be grateful for the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

