

Privacy and Cookie Policy

Tempfair Limited (t/a Tempo) (Tempo, we, or us) is a company incorporated in England with company number 09975968. Our registered office is 8 Greencoat Place, London, England, SW1P 1PL. Via our site at <https://www.heytempo.com> (our site), and mobile app (our app), Tempo provides services to facilitate the hiring of temporary office staff (our service).

This policy sets out the basis on which any personal data (meaning information about an individual from which that individual can be personally identified) we collect from you, or that you, or others, provide to us, will be processed by us.

For the purpose of data protection laws, the data controller is Tempfair Limited.

1 Basis for Processing Personal Data

1.1 Paragraphs 1.2 – 1.9 below explain how and why we process your personal data, as well as the legal basis on which we carry out this processing.

1.2 **To enter into a contract with you:** Where you subscribe to receive our service, we will process your personal data (including your name, address, dates of birth, education and employment history, bank account details, national insurance number, email addresses, phone numbers) to process your account registration and generate your profile.

We will also process such personal data for the purposes of entering into a contract with you in relation to your assignment, on a temporary basis, to a third party client of Tempo. We need to process your data in this way in order to create a legal relationship for any such assignment, and to ensure that you are able to be paid remuneration in relation to such assignment.

We need to process your personal data in this way to enter into and perform the contract for our services at your request. If you do not wish to provide us with your personal data in this way, you will be unable to register for an account on our site or app, receive our services, or be placed on assignments with third party clients of Tempo.

1.3 **To provide our services to you:** Where you subscribe to receive our service and use our device, we will process your personal data in order to improve the accuracy of our services that we provide to you.

If you are an individual candidate using our service in order to find a temporary or permanent work placement, our use of your personal data in this way includes sharing your personal data with businesses who use our website and app to source staff. These businesses will require access to your profile page and personal data (which will include your name, location, date of birth, and education and employment history) in order to offer you a work placement, or to offer you an interview for such a placement.

We need to process your personal data in this way to perform our service at your request. If you do not wish to provide us with your personal data in this way, we will be unable to provide our service to you.

In the event that you are successful hired, either on a temporary or permanent basis, we may process data relating to your criminal convictions or offences or

related security measures, only for the purposes of running background checks as requested by the Company which hires you. Any such background checks will be carried out by third party services who we may engage from time to time in order to carry out such checks. In the event that a background check is required, we will contact you to seek your specific consent to the background check before processing any data relating to your criminal convictions or offences or related security measures.

We may also share your personal data with third parties with whom we have a commercial relationship for the supply of services which are necessary to allow us to provide our services. These third parties provide us with services such as:

- 1.3.1 Applicant Tracking Systems services, which allow the processing of your application for temporary or permanent placements with certain employers who use our site and/or app;
- 1.3.2 Financial and payroll services, which allow us to pay individual candidates for their time spent in a temporary work placement;
- 1.3.3 Email services, which allow us to send individual candidates email notifications of interview and job offers; and
- 1.3.4 Storage and database services, which allow us to securely store, host, and maintain our database of candidates and employers.

- 1.4 **To make our site and our app better:** We will also process your personal data in order to provide you with a more effective user experience (such as improving the layout of our site to make sure the pages that you visit more frequently are more easily accessible from our home page.

Our use of your information in this way means that your experience of our site will be more tailored to you, and that the content which you see on our site may differ from someone accessing the same site with a different history or browsing habits.

We also use various cookies to help us improve our site and our app (more details are set out in section 3), and share your personal data with third party analytics and search engine providers that assist us in the improvement and optimisation of our site.

We will also process your personal data for the purposes of making our site more secure, and to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

The legal basis on which we process your data in these circumstances is our legitimate interest to provide you with the best customer experience we can, and to ensure that our site is kept secure.

The use of non-essential cookies is subject to your consent. You can also prevent us from using your personal data in this way by using the 'do not track' functionality in your internet browser. If you enable such do not track functionality, our site may be less tailored to your needs and preferences.

- 1.5 **To provide customer services to you:** We may also process your personal data in order to provide various supporting customer services to you (such as where you contact us with a question in connection with our device). The legal basis on which

we process your personal data in these circumstances is your consent. If you do not provide us with the personal data we request from you for customer services purposes, we may not be able to fully answer your queries.

- 1.6 **To provide job alerts to you:** Where you have opted in via our site or our app to receive job alerts from us, we will process your personal data to provide you with new temporary or permanent jobs that have been added to our site and app in line with the preferences you have provided.

The legal basis on which we process your personal data is your consent. You are not under any obligation to provide us with your personal data for marketing purposes, and you can withdraw your consent to your personal data being processed in this way at any time by contacting us at info@heytempo.com or, where relevant, by following the unsubscribe link in every job alert you receive from us.

- 1.7 **For marketing purposes:** Where you have opted in via our site or our app to receive marketing communications from us, we will process your personal data to provide you with marketing communications in line with the preferences you have provided.

The legal basis on which we process your personal data is your consent. You are not under any obligation to provide us with your personal data for marketing purposes, and you can withdraw your consent to your personal data being processed in this way at any time by contacting us at info@heytempo.com or, where relevant, by following the unsubscribe link in every marketing communication you receive from us.

- 1.8 **If our business is sold:** We will transfer your personal data to a third party:

1.8.1 in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets (at all times in accordance with data protection legislation); or

1.8.2 if Tempfair Limited or substantially all of its assets are acquired by a third party, in which case personal data held by Tempfair Limited about its customers will be one of the assets transferred to the purchaser.

in each case, the legal basis on which we process your data in these circumstances is our legitimate interest to ensure our business can be continued by a purchaser.

- 1.9 If you object to our use of your personal data in this way, the relevant seller or buyer under a duty to disclose or share personal data in order to comply with a legal obligation.

2 Categories of Information We Collect from You

We will collect and process the following personal data:

- 2.1 **Information you give us: This is information about you that you give us by:**

2.1.1 filling in forms on our site or our app;

2.1.2 registering for an account with us;

2.1.3 setting up a candidate profile; or

2.1.4 by corresponding with us by phone, e-mail or otherwise.

It includes information you provide when you register to use our site and our app, participate in social media functions on our site, or participate in a survey (if applicable), and when you report a problem with our site or our app.

The information you give us may include your names, addresses, dates of birth, education and employment history, bank details, national insurance number, email addresses and phone numbers.

2.2 Information we collect about you:

2.2.1 With regard to each of your visits to our site we will automatically collect the following information:

2.2.1.1 technical information, including the Internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, screen resolution, operating system and platform; and

2.2.1.2 information about your visit, including the full Uniform Resource Locators, clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

2.2.2 With regard to each of your visits to our app and use of our device we will automatically collect the following information:

2.2.2.1 technical information, including the type of mobile device you use, your mobile network information, your mobile operating system, the type of mobile browser you use, and time zone settings;

2.2.2.2 details of your use of any of our app including, but not limited to traffic data, weblogs and other communication data (whether this is required for our own billing purposes or otherwise), and your time spent using our app.

2.3 **Information we receive from other sources:** We may receive information about you when you use our site or our app. We are also working closely with third parties (including, our payment providers, as well as other business partners, sub-contractors, advertising networks, analytics providers, hosting providers and search information providers) from whom we may also receive general aggregated anonymous information about you.

2.4 We do **not** process any of the following special categories of personal data, meaning personal data revealing:

2.4.1 racial or ethnic origin;

2.4.2 political opinions; religious or philosophical beliefs or trade union membership;

2.4.3 genetic or biometric data that uniquely identifies you; or

2.4.4 data concerning your health, sex life or sexual orientation.

2.5 In the event that you are successful hired, either on a temporary or permanent basis, we may process data relating to your criminal convictions or offences or related security measures, only for the purposes of running background checks as requested by the Company which hires you. Any such background checks will be carried out by third party services who we may engage from time to time in order to carry out such checks. In the event that a background check is required, we will contract you to seek your specific consent to the background check before processing any data relating to your criminal convictions or offences or related security measures.

3 Cookies

3.1 Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

3.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. We only use (and store) non-essential cookies on your computer's browser or hard drive if you provide your consent. Details of the cookies we use (if any) are listed in the table below:

| Cookie | Name | Purpose |
|------------------|--------------------------------------|------------|
| Intercom | intercom-* (any with this prefix) | Functional |
| Google Analytics | _ga*, _gid | Analytics |
| Microsoft Bing | _uetsid | Marketing |
| HotJar Analytics | _hjIncludedIn Sample | Analytics |
| Tempo | analytics | Marketing |
| Tempo | landing | Marketing |
| Google Maps | * (any) | Functional |

3.3 Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

3.4 You can block cookies by activating the setting on your browser that allows you to

refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

3.5 Except for essential cookies, all cookies will expire after 2 years.

4 Uses Made of the Information

We will combine the information you provide to us with information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive) including, without limitation, to provision of the services.

5 Where We Store Personal Data

5.1 The data that we collect from you will be stored in a location within the European Economic Area.

5.2 We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. In particular, any transfer of your personal data made by us to a location outside of the EEA will be safeguarded by:

5.2.1 by transferring your personal information to a country that has been deemed to provide an adequate level of protection by the European Commission;

5.2.2 by using specific contracts approved by the European Commission which give your personal information the same protection it has; or

5.2.3 where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

5.3 To keep this privacy policy as short and easy to understand as possible, we have not set out the specific circumstances when each of these protection measures are used. You can contact us at info@heytempo.com for the details as to how we protect specific transfer of your data

5.4 All information you provide to us is stored on our secure servers or those of our third party data storage providers.

5.5 Where you have chosen a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. You must not share your password with anyone.

6 Period of Storage

6.1 When we collect your personal data to provide the services to you, we will retain this for a period of 6 years after the contract between us has ended, to ensure we can respond to any legal claims.

6.2 Where we have processed your personal data to provide you with marketing communications, we will contact you at least every 12 months to ensure you are

happy to continue receiving such communications. If you tell us that you no longer wish to receive such communications, your personal data will be removed from our lists.

- 6.3 Where we have processed your data for any other reason (such as where you have contacted us with a question in relation our site or app), we will retain your data for a period of 6 years.

7 Your Right to Object Under Data Protection Laws

- 7.1 You have the right to object to us processing your personal data where we are processing your personal data:

7.1.1 based on our legitimate interests (as set out at sections 1.4 and 1.8 above). If you ask us to stop processing your personal data on this basis, we will stop processing your personal data unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection laws; and

7.1.2 for direct marketing purposes. If you ask us to stop processing your personal data on this basis, we will stop.

8 Your Other Rights Under Data Protection Laws

Right of access

- 8.1 You have the right to receive confirmation as to whether your personal data is being processed by us, as well as various other information relating to our use of your personal data. You also have the right to access your personal data which we are processing. You can exercise such right by contacting us at info@heytempo.com.

Right to rectification

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

Right to restriction

- 8.3 You have the right to restrict our processing of your personal data where:
- 8.3.1 the accuracy of the personal data is being contested by you;
 - 8.3.2 the processing by us of your personal data is unlawful, but you do not want the relevant personal data erased;
 - 8.3.3 we no longer need to process your personal data for the agreed purposes, but you want to preserve your personal data for the establishment, exercise or defence of legal claims; or

8.3.4 we are processing your data on the basis of our legitimate interest (as set out at section 1.4 and 1.8 above) and you:

8.3.4.1 object to our processing on the basis of our legitimate interest under section 7.1.1 above; and

8.3.4.2 want processing of the relevant personal data to be restricted until it can be determined whether our legitimate interest overrides your legitimate interest.

8.4 Where any exercise by you of your right to restriction determines that our processing of particular personal data is to be restricted, we will then only process the relevant personal data in accordance with your consent and, in addition, for storage purposes and for the purpose of legal claims.

Right to data portability

8.5 You have the right to receive your personal data in structured, standard machine readable format and the right to transmit such personal data to another controller.

8.6 This right only applies to your personal information we are handling because you consented to us using it or because there is a contract in place between us.

Right to erasure

8.7 You have the right to require we erase your personal data which we are processing where one of the following grounds applies:

8.7.1 the processing is no longer necessary in relation to the purposes for which your personal data were collected or otherwise processed;

8.7.2 our processing of personal your data is based on your consent, you have subsequently withdrawn your consent and there is no other legal ground we can use to process your personal data;

8.7.3 you object to the processing in as set out in section 7.1.1 of this policy and we have no overriding legitimate interest for our processing,

8.7.4 the personal data have been unlawfully processed; and

8.7.5 the erasure is required for compliance with a law to which we are subject.

Right to complain

8.8 You have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for data protection issues in England and Wales.

9 Links on our Site

9.1 Our site may, from time to time, contain links to and from the websites of our partner networks and affiliates.

9.2 Our site connects you to different websites. If you follow a link to any of these websites, please note that you have left our site and these websites have their own

privacy policies.

- 9.3 We do not accept any responsibility or liability for these policies or websites. Please check these policies before you submit any personal data to these websites.

10 Changes to our Privacy Policy

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

11 Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to the data controller by emailing: info@heytempo.com.

This privacy policy was last updated on 17 May 2018