

Privacy Policy

As part of our day-to-day business, we need to collect personal information from our users, customers and potential users and customers to ensure that we can meet their needs for a range of transactional services and provide them with information about our services.

Your privacy is important to us and it is our policy to respect the confidentiality of information and the privacy of individuals. This notice outlines how we manage your personal information supplied to us by you or a third party in connection with our provision of services to you or which we collect from your use of our services and/or our app(s) or website(s). It also details your rights in respect of our processing of your personal information.

Our privacy notice will be reviewed from time to time to take account of new obligations changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any personal information we hold will be governed by our most current privacy notice.

Any reference to 'us', 'our', 'we' or 'WPYiT' in this privacy notice is a reference to each group company within the WPYiT Group as the context requires unless otherwise stated.

Similarly, any reference to 'you', 'your', 'yours', 'yourself' or 'User' in this privacy notice is a reference to any of our users, customers and potential users and customers as the context requires unless otherwise stated.

1 Who we are

This privacy notice applies to the processing activities of WPYiT.

WPYiT is the data controller of your personal information in relation to the Services provided for under the Terms and Conditions of Use and Service.

The data controllers within WPYiT may change from time to time in line with developments in WPYiT business.

2 What kind of personal data and information do we collect?

If you are an actual or potential User, we may collect the following types of data about you:

- name, address and contact details;
- date of birth and gender;
- profession and employment details;
- Education details;
- Skills, experience, and competency details;
- location data;
- Legal, tax and financial information about the company(ies) you are operating with to provide your services;
- any other similar information related to your WPYiT account.

We obtain this information in a number of ways through your use of our services or other dealings with us including through any of the WPYiT websites, apps, as well as through the Payment Service Provider applications, our demo or webinar sign up forms, subscribing to RSS and/or push notifications,

news updates and from information provided in the course of ongoing customer service correspondence.

We can also keep records of your platform usage, including a record of:

- your use of our websites, apps or through the use of cookies on our websites and/or apps, in particular by recording which pages you look at on our websites;
- the Jobs contracted through us, and their performance;
- invoices we issue on your behalf and corresponding payments;
- historical data about your job searches, offer submissions, job reference, and rates;
- your profile details and skills;
- your communications with other users.

We may ask for other personal information voluntarily from time to time (for example, through market research, surveys, or special offers). If you choose not to provide the information and if we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

We may record any communication, electronic, by telephone, in person or otherwise, that we have with you in relation to the Services we provide to you and our relationship with you. These recordings will be our sole property and will constitute evidence of the communication between us. Such telephone conversations may be recorded without the use of a warning tone or any other further notice.

Further, if you visit any of our offices or premises, we may have CCTV which will record your image.

3 Who may we disclose personal information to?

As part of using your personal information for the purposes set out above, we may disclose your information to:

- other companies within WPYiT Group that provide trading, transactional, financial and other back-office services;
- service providers and specialist advisers who have been contracted to provide us with administrative, IT, financial, regulatory, compliance, insurance, research or other services; credit providers, courts, tribunals and applicable regulatory authorities as agreed or authorized by law or our agreement with you;
- credit reporting or reference agencies;
- anyone authorized by you.

Generally, we require that organizations outside WPYiT who handle or obtain personal information acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the all-relevant data protection laws and this privacy notice.

Third party service providers, including but not limited to credit referencing agencies or Payment Service Provider, may keep a record of any searches performed on our behalf and may use the search details to assist other companies in performing their searches.

Please note that the use of your personal information by external third parties who act as data controllers of your personal information is not covered by this privacy notice and is not subject to our privacy standards and procedures.

4 How do we obtain your consent?

Where our use of your personal information requires your consent, such consent will be provided in accordance with the applicable agreement available on our website(s) or any other contract we may have entered into with you or as set out in our communication with you from time to time.

If we rely on your consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time by contacting us using the contact details set out in this privacy notice.

5 Management of personal information

We always take appropriate technical and organizational measures to ensure that your information is secure. In particular, we train our employees who handle personal information to respect the confidentiality of User information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal where appropriate and necessary.

6 How do we store personal information and for how long?

Safeguarding the privacy of your personal information is important to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We hold personal information in secure computer storage facilities, cloud servers and paper-based files and other records and take steps to protect the personal information we hold from misuse, loss, unauthorized access, modification or disclosure.

Regarding the use of cloud servers, we currently use Clever Cloud (<https://www.clever-cloud.com/>). Clever Cloud meets the European requirements about data protection laws. For example, Clever Cloud is committed to ensuring the best level of data protection. In accordance with their Terms and Conditions of Use, these commitments towards Personal Data (the “Personal Data” under Regulation UE n°2016/679) of April 27, 2016 “GDPR”) are described in their Privacy Policy and Data Processing Agreement (<https://www.clever-cloud.com/privacy-policy/>). All data are hosted in France. Clever Cloud also enables a high level of security and maintains certification with robust security standards, such as ISO 27001, SOC 1/2 , PCI DSS and SSAE 18.

When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

However, we may need to maintain records for a significant period of time. For example:

- we are subject to certain anti-money laundering laws which require us to retain a copy of the documents we used to comply with our customer due diligence obligations; and supporting evidence and records of transactions with you and your relationship with us, for a period of five years after our business relationship with you has ended.
- If we hold any personal information in the form of a contract, we will retain this contract deed in its complete form for a period of 10 years after our business relationship with you has ended.
- If we hold any personal information in the form of a recorded communication, by telephone, electronic, in person or otherwise, this information will be compliant with local regulatory

requirements which will either be 5 years or 10 years, subject always to statutory requirements, after our business relationship with you has ended.

Where you have opted out of receiving marketing communications, we will hold your details on a separate designated list of persons so that we know you do not want to receive these communications.

7 The personal information we hold about you

For further information about any rights that might be available to you in relation to the personal information we hold about you, please refer to our website or contact us at privacy@wpyt.com.

8 How can you modify/ask for removal the data we hold about you?

To modify, or ask for the removal of the information that we hold about you, you can contact us at privacy@wpyt.com with your case in subject. You can easily modify certain types of information from your personal profile page on our platform.

9 Cookies

A cookie is a small piece of text stored on your computer or device when you visit a website or an app.

We use cookies on our websites or our apps to provide you with a more relevant and effective experience, including presenting web pages in accordance with your needs or preferences.

10 Technology Improvements

We are constantly striving to improve functionality on the WPYiT site through technology changes. This may mean a change to the way in which personal information is collected or used. The impact of any technology changes which may affect your privacy will be reflected in this privacy policy at the time of the change.

11 Links to third party websites

Our websites or our apps may have links to external third-party websites. Please note, however, that third party websites are not covered by this privacy notice and those sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

12 What if you have a complaint?

If you have a concern about any aspect of our privacy practices, you can make a complaint. This will be acted upon promptly. To make a complaint, please contact us via one of the methods set below.

If you are not satisfied with our response to your complaint, you have the right to lodge a complaint with our supervisory authority, the National Commission for Data Protection (Commission Nationale pour la Protection des Données (CNPD)). You can find details about how to do this on the CNPD website at <https://cnpd.public.lu/en.html> or by calling their main line on (+352) 26 10 60-1.

13 How to contact us

If you have any questions about this privacy notice or want to exercise your rights, please contact us by:

- email at privacy@wpvit.com; or
- writing at the address provided in the “Contact us” section of this website.