

Privacy policy

This privacy policy applies between you, the User of this Website & System and Flabba Ltd, the owner and provider of this Website & System. Flabba Ltd takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website & Systems. **Please read this privacy policy carefully.**

You can easily control the use of your data on our Website and the Flabba platform through the Data Console Centre provided. This allows you to administer access and remove all of your data should you wish.

The precise data collected is listed below under Data Collected.

Definitions and interpretation

•In this privacy policy, the following definitions are used:

Data	collectively all information that you submit to Flabba Ltd via the Website & System. This definition incorporates, where applicable, the definitions provided in the Data Protection Act 1998 & the new European GDPR legislation
Flabba Ltd	Flabba Ltd, a company incorporated in England and Wales with registered number 08116743 whose registered office is at 94 Florence Road, Poole, Dorset, BH14 9JG;
User	any third party that accesses the Website & System and is either (i) employed by Flabba Ltd and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Flabba Ltd and accessing the Website & System in connection with the provision of such services; (iii) Clients and employees of those clients of Flabba that use the Flabba system/s, and (iv) You.
Website & System	the Website & System that you are currently using, www.flabba.com , and any sub-domains of this site unless expressly excluded by their own terms and conditions.

- In this privacy policy, unless the context requires a different interpretation:
- the singular includes the plural and vice versa;
- references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
- a reference to a person includes firms, companies, government entities, trusts and partnerships;
- "including" is understood to mean "including without limitation";
- reference to any statutory provision includes any modification or amendment of it;
- the headings and sub-headings do not form part of this privacy policy.

Scope of this privacy policy

- This privacy policy applies only to the actions of Flabba Ltd and Users with respect to this Website & System. It does not extend to any Website & Systems that can be accessed from this Website & System including, but not limited to, any links we may provide to social media Website & System.

Data collected

- We may collect the following Data, which includes personal Data, from you:
- Name
- Date of Birth;
- Gender;
- Job Title;
- Profession;
- Contact Information such as email addresses and telephone numbers;
- Demographic information such as post code, preferences and interests;

- IP address (automatically collected);
- Web browser type and version (automatically collected);
- Operating system (automatically collected);
- Information required for your Application.
- career history
- Video Interviews
- in each case, in accordance with this privacy policy.

Our use of Data

- For purposes of the Data Protection Act 1998 and the new GDPR legislation, Flabba Ltd is the "data processor".
- We will retain any Data you submit for 12 months automatically but you can remove your data at anytime through our Data Control Centre.
- Unless we are obliged or permitted by law to do so, and subject to any third party disclosures specifically set out in this policy, your Data will not be disclosed to third parties. This does not include our affiliates and / or other companies within our group.
- All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998 & GDPR. For more details on security see the clause below (**Security**).
- Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website & System. Specifically, Data may be used by us for the following reasons:
 - internal record keeping;
 - improvement of our products / services;
 - transmission by email of promotional materials that may be of interest to you;
 - contact for market research purposes which may be done using email,

telephone, fax or mail. Such information may be used to customise or update the Website & System;

- assist in the delivery of Flabba core services;

in each case, in accordance with this privacy policy.

Third party Website & Systems and services

- Flabba Ltd may, from time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website & System. The providers of such services have access to certain personal Data provided by Users of this Website & System.
- Any Data used by such parties is used only to the extent required by them to perform the services that we request. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties will be processed within the terms of this privacy policy and in accordance with the Data Protection Act 1998 and GDPR legislation.

Links to other Website & System

- Our Website & System may, from time to time, provide links to other Websites & or System. We have no control over such Websites & Systems and are not responsible for the content of these Websites & Systems. This privacy policy does not extend to your use of such Websites & Systems.

Changes of business ownership and control

- Flabba Ltd may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Flabba Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.
- We may also disclose Data to a prospective purchaser of our business or any part of it.
- In the above instances, we will take steps with the aim of ensuring your

privacy is protected.

Controlling use of your Data

- Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:
- use of Data for direct marketing purposes; and
- sharing Data with third parties.
- You will be able to control your Data and its use from the Data Console on our System

Functionality of the Website & System

- To use all features and functions available on the Website & System, you may be required to submit certain Data.
- Your data will be used by secure approved personnel to process your application and or carry out their required role.
- We may be required to message you from the Website & Flabba platform for the purpose of managing workflows built into the system. i.e. arranging interviews, updating your data etc.

Accessing your own Data

- You have the right to ask for a copy of any of your personal Data held by Flabba Ltd (where such Data is held).
- You also have the ability to control the access to your data per GDPR regulation and can instruct its removal from our systems. There is a Data Control Centre to allow you to control your data.

Security

- Data security is of great importance to Flabba Ltd and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website & System.
- If password access is required for certain parts of the Website & System, you

are responsible for keeping this password confidential.

- We endeavour to do our best to protect your personal Data. However, transmission of information over the internet is not entirely secure and is done at your own risk. We cannot ensure the security of your Data transmitted to the Flabba Website & System.

Transfers outside the European Economic Area

- Data which we collect from you may be stored and processed in and transferred to countries outside of the European Economic Area (EEA). For example, this could occur if our servers are located in a country outside the EEA or one of our service providers is situated in a country outside the EEA. We also may share information with our group companies, some of which may be located outside the EEA. These countries may not have data protection laws equivalent to those in force in the EEA.
- If we transfer Data outside the EEA in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected as outlined in this privacy policy. You expressly agree to such transfers of Data.

General

- You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
- If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
- Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
- This privacy policy is governed by and interpreted according to English law. All disputes arising under this privacy policy are subject to the exclusive jurisdiction of the English courts.

Changes to this privacy policy

- Flabba Ltd reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website & System and you are deemed to have accepted the terms of the privacy policy on your first use of the Website & System following the alterations. You may contact Flabba Ltd by email at support@flabba.com.

Dated: 27th April 2020