

## Data Policy and Privacy Notice

### Introduction

This Privacy Notice explains how we use any personal data (also referred to as 'information') we collect about you.

It describes:

- what information we collect about you or your business;
- how we use your information;
- who we share your information with;
- your rights regarding our use of your information;
- how we protect your information;
- how long we keep your information;
- your individual responsibility; and
- how to contact us

If you have any questions about our data protection compliance please contact Emma Weisgard on [Emma@blurred.global](mailto:Emma@blurred.global)

### What information do we collect about you?

We collect the following information about you:

- when you register with us to make a career enquiry;
- if you make an enquiry about our services as a prospective client or as an individual;

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[hello@blurred.london](mailto:hello@blurred.london)

- when you voluntarily complete customer surveys, provide feedback and participate in competitions or agree to be on our contact lists in relation to our client communications;
- when we use cookies to collect information about your use of our website and
- when we use a third-party service (e.g. Google Analytics) to collect information about how visitors to our website use the site, including collecting information about what country you logged on from, which pages you visited and how long you were on our site.

### **How do we use your information?**

We use your information to:

- process your request for news items about our company and, if you agree, to email you about other services we think may be of interest to you;
- email you about similar goods and services to those you've purchased from us which you may be interested in; and
- enter and perform a contract with you or to perform any steps you require from us before entering into the contract. If you do not provide information required by us to enter into a contract with you, we will not be able to enter into that agreement with you or provide you the services you require.

### **We will rely on one of the following legal grounds (as appropriate) to process your personal data:**

- to enter and perform a contract with you or to perform any steps you require from us before entering into a contract;
- to pursue our legitimate business interests in providing and marketing our products and services;
- your specific consent to us using your information, which you can withdraw at any time;
- to comply with our legal obligations and establish, exercise or defend our legal rights; and
- those other purposes that you have agreed with us.

### **Who do we share your information with?**

We share information with the following third parties:

- data processors, who are our suppliers who provide us services;
- if you become an employee or freelancer your information will be passed on to and stored with our processing partners in relation to payroll, healthcare and invoice payments. The use of this personal data is restricted to the extent necessary for the performance of the contract between us;

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- persons connected with any sale, merger, acquisition, disposal, reorganisation or similar change of our business including any potential or actual purchaser of that business and that purchaser's advisors;
- local and foreign regulators, governments, law enforcement authorities, advisors, courts, tribunals and arbitrators; and
- other third parties, with your consent.

If we do transfer your information from the EEA to a jurisdiction outside the EEA, we will take appropriate steps to protect that information which includes: (i) entering into an agreement with the third party which includes clauses that the EU Commission has determined offers adequate protection for your information, a template copy of which is available at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en) or (ii) otherwise ensuring that information would only be transferred to third parties in jurisdictions that the EU Commission has determined offers adequate protection for your personal information.

### **How do we protect data?**

We take the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate measures to ensure the security of data.

All confidential client data is protected by password and accessed by only essential members of staff required to do so in the act of servicing your business.

### **What are your rights in relation to our use of your information?**

You have rights under data protection law in relation to our use of your personal data, including to:

- request access to your information by submitting a request to [hello@blurred.global](mailto:hello@blurred.global)
- update or amend your information if it is inaccurate or incomplete;
- object to certain uses of your personal data including direct marketing and processing based on legitimate interests and processing for purposes of scientific or historical research and statistics on grounds relating to your particular situation;
- request the deletion of your information, or restrict its use, in certain circumstances (for example, subject to lawful exceptions applying, you can request that we erase your information where the information is no longer necessary for the purpose for which it was collected);
- to withdraw any consents you have provided in respect of our use of your information; • to request a copy of the information you have provided to us, to use for your own purposes (often called your right to data portability); and

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- to lodge a complaint with the relevant data protection supervisory authority in your jurisdiction. If you have subscribed to us or agreed to be on a contact list to receive information from us, you can ask to be removed at any time by using the unsubscribe link included in any e-communications or by emailing [hello@blurred.global](mailto:hello@blurred.global)

If you have any questions about these rights, or you would like to exercise any of them, please contact us by submitting a request to [hello@blurred.global](mailto:hello@blurred.global) – additional details of how to get in touch are set out in section 12 below.

### **How long do we keep your information?**

Personal data of employees and freelancers will be kept for no longer than is necessary, and that period of time will be determined with reference to applicable statutory limitation periods in your jurisdiction.

Our policy is to destroy employment applications 1 (one) year after their submission if they have not led to an offer of employment. If you are engaged with us 'to perform a contract', then local market data retention legislation may apply to elements of the information you supply us.

Any other information obtained as set out in section 2 above will be kept for no longer than is necessary and will be determined with reference to applicable statutory limitation periods in your jurisdiction, or otherwise as agreed between us.

We will keep our retention policies under review to ensure that your data is not stored for longer than is strictly necessary.

### **What if you do not provide personal data?**

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, the organisation may not be able to process your application properly or at all.

### **Automated decision-making**

Employment decisions are not based solely on automated decision making.

### **How to contact us?**

If you have any questions about this Privacy Notice or the information we hold about you, you can contact us:

- by email: [hello@blurred.global](mailto:hello@blurred.global)
- by post: Emma Weisgard, Blurred Ltd 16-25 Bastwick Street, London EC1V 3PS.

Enquiries from outside of the European Union can still be made via the above email or postal route.

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## **Changes to this Privacy Notice**

We keep this Privacy Notice under regular review and we will place any updates on this webpage.

This Privacy Notice was last updated in May 2024.

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