

# 0.3

## Visitors to our Website



## **Signing Up to Our Newsletter**

We collect and process your personal data in order to sign you up to our newsletter.

#### What information do we collect?

We may collect any of the following:

- 1. Full name
- 2. Email address
- 3. IP address

#### How do we collect your information?

We collect this information when you sign up to our newsletter on our Contact Us page.

#### How do we use your information?

We use your information in order to keep you informed about recent developments in the job market and at Saragossa, and to share our latest blogs, videos and any other relevant recruitment information.



## Our basis for processing your data

**Consent** – by opting-in to receiving our newsletter, you are consenting for us to add your email address to our mailing list. You can opt-out at any time by either unsubscribing via the unsubscribe link in every newsletter, or by emailing <u>dpo@saragossa.co.uk</u>

#### Who we share your data with

Various third party providers including: our marketing automation platform(s), email provider, cloud storage provider, and/or our email security provider.

## How long do we keep your information for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirement.

We maintain detailed policies and procedures regarding how and for how long we retain your personal data.



## What are your rights?

You have certain, specific rights with respect to how we process your data. Saragossa is committed to ensuring that your rights are protected.

You may exercise your rights below by contacting us using the details at the end of this Privacy Policy.

The GDPR sets out the following rights applicable to data subjects:

- 1. **The Right to be Informed.** We have provided this Privacy Policy to provide you with concise, transparent, intelligible and easily accessible information about how we use your personal data.
- 2. **The Right of Access.** You may request access to a copy of your personal data by contacting us on the details below.
- 3. **The Right to Rectification.** You may ask us to rectify inaccurate information held about you. We will also get in touch with you periodically to ensure that we hold the correct details and most up to date version of your information i.e. your CV.
- 4. The Right to Erasure. You may ask us to delete your personal data. We may not be able to erase your personal data if there is an overriding contract/legal basis for retaining it, but we will let you know this reason in response to your request. Please note that in the event you wish to exercise these rights, we may be unable to process any applications (including those in-flight).
- 5. **The Right to Restrict Processing.** You may ask us to restrict the processing of your personal data, and we will comply when one of the following applies:



- a. you are contesting the accuracy of your personal data that we hold, while we verify the accuracy of your personal data;
- the way we are processing the personal data is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- we no longer need the personal data for the purposes of the processing, but you need the personal data to establish, exercise or defend legal claims; or
- d. you have objected to processing in the public interest or in relation to our legitimate interest, pending the verification whether any legitimate grounds we may have override your right.

While you have restricted its processing, we will only store your personal data in question, and may process it only with your consent or to establish, exercise or defend legal claims or protect the rights of another natural or legal person or for reasons of important public interest. We will notify you before lifting the processing restriction.

- 6. **The Right to Data Portability.** You may ask us to provide you with the personal information that we hold about you in a structured, commonly used, machine-readable format, or ask us to send such information to another data controller, where:
  - a. the processing is based on consent or on a contract; and
  - b. the processing is carried out by automated means.

Where technically feasible, we will transmit your personal data directly to the other controller.



- 7. **The Right to Object.** You have the absolute right to object to the processing of your data in relation to direct marketing. You can also object to Saragossa processing your data in connection with our legitimate purpose.
- 8. **Rights with respect to Automated Decision-Making and Profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling. At present all of our decisions involve human decision-making.
- 9. Right to lodge a complaint with your data protection supervisory authority In the event you believe that we are processing your personal data otherwise than in accordance with the provisions of the GDPR, you have the right to lodge a complaint with the data protection supervisory authority located in the EU jurisdiction where you reside. For the UK, the supervisory authority is the UK Information Commissioner's Office.

## **Children's Privacy**

Saragossa does not knowingly collect information from children under the age of 16 and Saragossa does not target its Website or any of its services to children under the age of 16.

#### **Security and Data Storage**

At Saragossa we are committed to protecting the information you provide to us. To prevent unauthorised access or disclosure, to maintain data accuracy, and to ensure the appropriate use of the information, Saragossa has in place



appropriate technological and operational procedures to safeguard the information we collect.

If you believe Saragossa has handled your personal data in a manner that does not comply with this Privacy Policy, please contact us using the details below.

#### How Does Our Site Use Cookies?

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using Our Site, you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on Our Site for Google Analytics.

For more details of the personal data that we collect and use, the measures we have in place to protect personal data, your legal rights, and our legal obligations please refer to our Privacy Policy.

For more specific details of the Cookies that we use, please refer to the table below.



## What Cookies Does Our Site Use?

The following first-party Cookies may be placed on your computer or device:

#### laravel\_session

Site requirement to identify site visitor throughout their visit Expiration Time: 12 hours

#### \_ga

Used to distinguish users Provider: Google Analytics Expiration Time: 2 years

#### \_gid

Used to distinguish users Provider: Google Analytics Expiration Time: 24 hours

#### \_gat

Used to throttle request rate Provider: Google Analytics Expiration Time: 1 minute

#### \_atuvc

Helps to ensure share counter you see on the website properly updates after you've shared something Provider: AddThis Expiration Time: 1 year

Google Analytics helps website owners to measure how users interact with website content. As a user navigates between web pages, Google Analytics records information about the page a user has seen, for example the URL of the



page. Google Analytics uses HTTP Cookies to "remember" what a user has done on previous pages/interactions with the website.

You can find more information about how Google Analytics uses cookies here.

You can find more information about the AddThis Social Sharing Platform here.

#### **Consent and Control**

In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

The links below provide instructions on how to control Cookies in all mainstream browsers:

**Google Chrome** 

Microsoft Internet Explorer

Microsoft Edge

Safari (macOS)

Safari (iOS)

Mozilla Firefox

Android



### **Changes to this Privacy Policy**

If there are updates to this Privacy Policy, we will post those changes and update the revision date in this document, so you will always know what information we collect, how we use it, and what choices you have. For material changes to this Privacy Policy, Saragossa will actively notify affected individuals.

This policy was last amended on 10 May 2019.

#### How you can contact us

If you have any comments or questions about our Privacy Policy or our use of your personal data or you wish to exercise any of your rights under this Privacy Policy please contact our Data Protection Officer:



dpo@saragossa.co.uk

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