



## PRIVACY POLICY OF THE PLATFORM

*Last update: May 2023*

### 1. PURPOSE

**HANTY SYSTEMS, S.L.** (hereinafter referred to as "**HANTY**", "**we**", "**our**", "**ours**", "**us**"), would like to offer you, as a user (hereinafter referred to as the "**User**", "**you**", "**yourself**", "**yours**"), a secure experience and service in our web environments located at <https://web.hanty.app> (hereinafter the "**Web Page**") and <https://app.hanty.app/> (the "**Platform**") (both web environments collectively referred to as the "**Website**").

As a result, we have implemented this Privacy Policy that complies with the security measures required by the Spanish Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights ("**LOPDGDD**"), the European Data Protection Regulation 679/2016, of April 27, regarding the protection of individuals with regard to the processing of personal data and the free movement of such data ("**GDPR**"), and Law 34/2002, of July 11, on Information Society Services and Electronic Commerce ("**LSSICE**"), all with the aim of ensuring your privacy and being transparent with the use of your data.

Although **HANTY** is subject to Spanish laws, we want to assure our Users that our Privacy Policy is fully compliant with UK law, specifically the UK Data Protection Act 2018 ("**UKDPA**"). Additionally, it is important to note that we adhere to the stricter regulations set forth by GDPR which provides comprehensive protection for personal data and imposes more stringent requirements compared to the UKDPA. By aligning our privacy practices with the GDPR, we aim to prioritize the highest standards of data protection, even when not explicitly required by UK law. Rest assured that **HANTY** takes data privacy seriously and is committed to upholding the principles and requirements outlined in both the UKDPA and the GDPR. We continuously review and update our privacy practices to ensure compliance with relevant regulations and to safeguard your rights and privacy.

Through this Privacy Policy, you are informed that the personal data you provide through the Website, as well as the data derived from your browsing and any other data you may provide in the future, will be processed by **HANTY as Data Controller according to both legal definitions of the GDPR and the UKDPA** and in the terms explained below. Therefore, the User should carefully read this Privacy Policy, which has been drafted in a clear and simple way, to facilitate its understanding.



## 1. IDENTIFICATION

- **Controller:** HANTY SYSTEMS, S.L.
- **Registered Office:** Calle Gaziel 42 P. BJ PTA. 1, 08017, Barcelona (Spain)
- **CIF:** B44564359
- **Registry Data:** Commercial Register of Barcelona, in Volume 48625, Sheet 216, Section 8, Page Number B-590527, Inscription 1<sup>a</sup>
- **E-mail:** [team@hanty.app](mailto:team@hanty.app)

## 2. OBLIGATION TO PROVIDE THE DATA

The data requested in the forms of the Website are, in general, mandatory (unless otherwise specified in the required field) to fulfill the purposes for which they are being collected, obtaining only those that are strictly necessary to ensure the proper functioning of the Website. Therefore, if they are not provided or are not provided correctly, the services offered through the Website may not be delivered properly.

## 3. FOR WHAT PURPOSE WILL HANTY PROCESS THE USER'S DATA?

The User's personal data will be processed by **HANTY** in accordance with the following purposes:

- (i) Management of registration on the Platform and the provision of services to the User.
- (ii) Provision of services and functionalities to Users, as well as communication of relevant information in relation to such services and functionalities of the Website, such as (i) New updates; (ii) New collaborations; (iii) New features; (iv) New services; and (v) New structures.
- (iii) Response to questions raised through the contact forms and/or the different communication channels offered to the User.
- (iv) Attention to the exercise of the User's rights.
- (v) Prevention and control of the use of the Website for illegal or unauthorized purposes, with or without economic purpose, including the reports of Users.



- (vi) Preparation of reports, statistics, and internal analysis to improve the services and contents offered on the Website, with the possibility of generating reports with aggregated data to be communicated to third parties, such as universities and study centers.
- (vii) Optimization and maintenance of the services, functionalities, and contents, as well as the detection of errors and problems of the Website.
- (viii) Profiling of the User to offer personalized services and content through the Platform.
- (ix) Sending personalized commercial communications.

#### **4. WHAT USER DATA WILL HANTY PROCESS?**

During the use of the Website, personal data of the Users may be processed for the purposes described in this section, including the collection of additional data through platforms such as JobTeaser or similar, where the User voluntarily decides to interconnect such data with **HANTY's** Platform for the purpose of recordkeeping their selection processes or other activities.

**HANTY** may also receive User data from their university or educational institution in order to create access credentials for the User to use the Platform. The collection and processing of personal data in this context will be properly regulated in the collaboration agreement established between **HANTY** and the respective universities or educational institutions, including the establishment of a data processing agreement in accordance with the GDPR and, when applicable, the UKDPA.

User data processed by **HANTY**:

- (i) Identification data.
- (ii) Contact information.
- (iii) Personal characteristics data.
- (iv) Data on the status of your selection processes with a company or entity.
- (v) Website navigation data.



- (vi) Data relating to the User's professional and academic experience.
- (vii) Other data provided by the Users themselves in the open fields of the forms or functionalities offered by **HANTY**.

It should be noted that the Platform allows the User to store data of third parties, such as when creating records of their selection processes, creating events or meetings in their calendar, or managing contacts in their own agenda generated within the Platform, among others. According to the provisions of the GDPR and the UKDPA, to the extent that the User uses the personal data of such third parties in their own private environment within the Platform and for exclusively personal or domestic activities, the GDPR and UKDPA may not apply, and the User would not be subject to such legal provisions.

However, if the User shares and disseminates such information to other Users within the Platform, they may be subject to the GDPR. Therefore, **the User guarantees that they have informed and obtained the explicit prior consent of those third parties for the processing and dissemination of their data, in accordance with the purposes set forth in this Privacy Policy, thereby releasing HANTY from any liability in this regard. In particular, HANTY does not allow the User to communicate or process data of minors under any circumstances within the Platform.**

Furthermore, in order to comply with and protect the rights and interests of all parties involved, **HANTY** reminds the User that the information derived from certain selection processes may be subject to confidentiality obligations or similar duties. Therefore, before sharing such information with other users within the Platform, the User must verify whether they are allowed to do so in relation to any confidentiality obligations they may have entered into with companies or entities. In this regard, **HANTY is not responsible for any potential breaches of confidentiality obligations that the User may have with third parties in their use of the Platform.**

**HANTY** may carry out periodic verifications to ascertain these facts, adopting the necessary due diligence measures in accordance with data protection regulations. In line with the principle of proactive responsibility and regulatory compliance that characterizes **HANTY**, it has established a communication channel for Users to report or inform about possible breaches by third parties or to request the removal of certain content uploaded on the Platform:

- **E-mail:** [team@hanty.app](mailto:team@hanty.app)



We will respond to your complaints or queries as soon as possible and, in any case, within a maximum period of one (1) month.

## **5. WHAT ARE THE LEGAL BASIS FOR THE PROCESSING OF THE USER'S DATA BY HANTY?**

The processing of the User's data by **HANTY** is legitimized by (i) their consent, (ii) in compliance with the existing service agreement between the parties and with the corresponding university or study center, (iii) the legitimate interest of **HANTY** and, (iv) in compliance with the legal obligations that affect **HANTY**.

In particular, **HANTY** processes the data on the following legal basis:

### **a) Management of registration on the Platform and provision of services to the User.**

All processing activities related to this purpose will be based on the fulfillment of the contractual relationship. Additionally, in the case that the User wants to link their profile on the Platform with other platforms such as JobTeaser, the legal basis for processing for this purpose will be the User's consent, obtained through a clear and affirmative action of linking the different web environments.

### **b) Provision of services and functionalities to Users, as well as communication of relevant information regarding such services and functionalities of the Website, including (i) New updates; (ii) New collaborations; (iii) New features; (iv) New services; and (v) New structures.**

All the processing derived from this purpose will have as a legal basis the fulfillment of the contractual relationship. Where appropriate, commercial communications via electronic means or newsletter could also be based on the consent of the User by completing the corresponding forms and ticking the appropriate verification and acceptance boxes.

### **c) Response to questions raised through the contact forms and/or the different communication channels offered to the User.**

The data processing derived from this purpose is the fulfillment of the contractual relationship or for the application at the User's request of pre-contractual measures.

### **d) Attention to the exercise of the User's rights.**

All processing derived from this purpose will be based on the legitimacy of compliance with legal obligations, in accordance with the provisions of the applicable regulations on data protection.

**e) Prevention and control of the unauthorized or illegal use of the Website, whether for economic purposes or not, including User reports.**

All processing activities related to this purpose will be based on the legitimate interest recognized by the data controller under the applicable regulations.

This legitimate interest is based on ensuring that the services, functionalities, or content are not used for illicit purposes, and in the event of such use, managing, processing, and resolving any illegal conduct carried out by the user or third parties.

**f) Generation of reports, statistics, and internal analysis to improve the services and content offered on the Website, with the possibility of generating reports with aggregated data to communicate to third parties, such as universities and educational institutions.**

All the processing activities derived from this purpose will be based on the legitimate interest, recognized to the data controller by data protection regulations. This legitimate interest is based on being able to offer **HANTY**'s services to Users with the highest quality and best possible experience.

In the case of communicating these reports to third parties, they will always be in the form of aggregated and anonymized data. However, if the reports contain personal data that may affect the User and are to be shared with third parties, the legal basis for this will be the fulfillment of the contractual relationship established with universities, educational institutions, or others, and, if applicable, the User's consent.

**g) Optimization and maintenance of services, functionalities, and content, as well as the detection of errors and issues on the Website.**

All processing activities derived from this purpose will be based on the legitimate interest recognized to the data controller by data protection regulations. This legitimate interest is based on being able to offer **HANTY**'s services to Users with the highest quality and best possible experience.



**h) Creation of a user profile to offer personalized services and content through the Platform.**

All the processing activities derived from this purpose will be based on the fulfillment of the contractual relationship and, where applicable, on the legitimate interest of **HANTY**.

**i) Sending personalized commercial communications.**

The processing derived from this purpose will be based on the legitimate interest, recognized to the data controller by the applicable regulations. This legitimate interest is based on the consideration of the interest of Users as customers of **HANTY** in offering them services through direct marketing, via email or push notifications on their devices, where appropriate. Likewise, and as previously informed, it could be the case that commercial communications via electronic mail or newsletter are based on the consent of the User by completing the corresponding forms and checking the appropriate verification and acceptance boxes.

Finally, it is worth mentioning that it could be that the User has given their consent for **HANTY** to process the data for additional purposes to those mentioned in this Privacy Policy, where the User will be duly informed of such processing, being the User entitled to revoke such consent by contacting **HANTY** through the following email address:

- **E-mail:** team@hanty.app

Again, please note that we will respond to your complaints or queries as soon as possible and, in any case, within a maximum period of one (1) month.

**6. WITH WHICH RECIPIENTS WILL THE USER'S DATA BE SHARED?**

The personal data provided by the User through the Website may be communicated to:

- (i) The Public Administrations in the cases provided for by law.
- (ii) Courts and Tribunals in the cases provided for by law.
- (iii) The State Security Forces and Corps in the cases provided by law.

- (iv) Our partners, such as universities and study centers in which you are enrolled or are part of, based on the fulfillment of the contractual relationship that binds us or, when expressly informed by **HANTY**, based on your consent.
- (v) Our suppliers in the event that they act as Data Processors in accordance with the provisions of the GDPR and UKDPA. In this case, a data processing agreement will be formalized in accordance with the provisions of the data protection regulations with these suppliers to ensure the security and lawful processing of your data.
- (vi) Other platforms, such as JobTeaser, through which the interconnection process takes place to provide feedback on the information derived from the User's selection processes or others, based on the User's own consent.

Currently, your access to the Platform is made possible through the collaboration agreements we have signed with your university or educational institution, so you will not have to make any payments to use it. However, in the future, **HANTY** may start offering its services directly to users through subscriptions or similar payment models. In such a case, payments would be processed through third-party payment platforms. In this regard, **HANTY** will not have access to the User's financial and/or banking data, as these platforms will be responsible for the data processed through their own payment systems.

## 7. INTERNATIONAL DATA TRANSFERS

In order to provide our services, we may need to transfer your personal data outside of United Kingdom, including to Spain. We want to assure you that such transfers will be carried out in compliance with applicable data protection laws and with the necessary legal safeguards to protect your privacy and rights. For transfers from United Kingdom to Spain, we may rely on legal mechanisms such as the decision of adequacy of the European Commission between the European Union and United Kingdom. This decision ensures that your personal data is adequately protected during the transfer and that the recipient in Spain handles your data in accordance with applicable data protection laws.

For all other cases, **HANTY** does not carry out international data transfers. Notwithstanding the foregoing, the User is informed that **HANTY**, in the event that it contracts services with third party companies that are outside United Kingdom and have access to User data, will adopt appropriate safeguards in accordance with the UKDPA, maintaining in any case the security, confidentiality and the duty of secrecy of the data.



## 8. DATA RETENTION

The personal data provided by the User will be stored for the following periods:

### **a) Management of registration on the Platform and provision of services to the User.**

The data provided for registration on the Platform, as well as for managing, processing, and formalizing subscriptions, functionalities, and services, will be retained for as long as the User has a created and verified profile on the Platform. Once the relationship is terminated, the data will be retained for the duration of the statute of limitations for any legal actions that may arise from it.

### **b) Provision of services and functionalities to Users, as well as communication of relevant information regarding such services and functionalities of the Website, including (i) New updates; (ii) New collaborations; (iii) New features; (iv) New services; and (v) New structures.**

The data provided for the provision of services and functionalities of the Website, as well as communications, will be retained for as long as the User uses the Website. Once the relationship is terminated, the data will be retained for the duration of the statute of limitations for any legal actions that may arise from it.

### **c) Response to questions raised through the contact forms and/or the different communication channels offered to the User.**

The data provided through contact forms and various communication channels made available to the User will be kept for the necessary period to process and respond to the request. Once this period is completed, the data will be retained for the duration of the statute of limitations for any legal actions arising from the aforementioned request.

### **d) Attention to the exercise of the User's rights.**

The data used to attend to the exercise of the User's rights will be retained for the duration necessary to process the right requested by the User and, once this right has been fulfilled, the data will be retained for the duration of the statute of limitations for any legal actions that may arise from this processing.

**e) Prevention and control of the unauthorized or illegal use of the Website, whether for economic purposes or not, including User reports.**

The data used for the resolution of problems, incidents or illicit activities derived from the activities of the Users will be kept during the duration necessary to process and solve the referred problems, incidents or illicit activities and once resolved, during the duration of prescription of the legal actions that could derive from them.

**f) Generation of reports, statistics, and internal analysis to improve the services and content offered on the Website, with the possibility of generating reports with aggregated data to communicate to third parties, such as universities and educational institutions.**

The data used for the preparation of reports, statistics and analyses will be kept for the duration necessary to process and prepare the aforementioned reports, statistics and/or analyses and, once this period has expired, for the duration of limitation of the legal actions derived from the aforementioned request.

**g) Optimization and maintenance of services, functionalities, and content, as well as the detection of errors and issues on the Website.**

The data used for the optimization of the services and detection of errors and problems of the Website will be kept for the duration necessary to process and develop the aforementioned optimization and error detection work and, once this period has expired, for the duration of limitation of the legal actions derived from it.

**h) Creation of a user profile to offer personalized services and content through the Platform.**

The data provided for the registration on the Platform, as well as for managing, processing, formalizing, and monitoring the services provided through it, will be retained during the contractual relationship or withdrawal of consent of the User. Once the relationship is terminated, the data will be retained for the duration of the statute of limitations for any legal actions that may arise from it.

**i) Sending personalized commercial communications.**



The data used for sending personalized commercial communications will be processed until the User objects or withdraws his consent.

In any case, **HANTY** will duly block the personal data of the Users, no longer having access to them once they are no longer necessary to fulfill the purpose for which they were collected. They will only be processed if required by the competent judicial or administrative authority in the cases expressly established by law.

## **9. USER RESPONSIBILITY**

The User guarantees that they are over eighteen (18) years old and that the data provided to **HANTY** is true, accurate, complete, and up-to-date. In this regard, the User is responsible for the truthfulness of all the data communicated and will keep the provided information appropriately updated to reflect their current situation.

Likewise, the User guarantees that they have informed and obtained the authorization from the third parties whose data they provide, regarding the aspects contained in this document, as previously stated.

In any case, the User will be responsible for any false or inaccurate information they provide through the Website and for any direct or indirect damages it may cause to **HANTY** or third parties.

## **10. EXERCISE OF USER RIGHTS**

The User may send a written request to **HANTY**, to the address indicated in the header of this Privacy Policy, or through an email to the following address: **team@hanty.app**, at any time and free of charge, to exercise the following rights. However, only in the case of reasonable doubts regarding the User's identity, **HANTY** may request a copy of their ID card for the sole purpose of diligent identification:

### **a) Right of Access:**

You will have the right to request **HANTY** to inform you whether or not it is processing your personal data, and if so, you will have the right to access such data and receive information about the purposes for which they are processed, the categories of data affected by the processing, the recipients to whom your personal data have been disclosed, and the envisaged retention period of the data, among other information.

**b) Right of Rectification and Right to be Forgotten:**

You will have the right to request the deletion of your personal data whenever the applicable legal requirements are met, and the rectification of inaccurate data concerning you when, among other reasons, they are no longer necessary for the purposes for which they were collected.

**c) Limitation of Processing, Withdrawal of Consent, and Total or Partial Objection to Processing**

In certain circumstances (for example, if the requester challenges the accuracy of their data while its accuracy is being verified), you may request that the processing of your personal data be limited, and they will only be processed for the exercise or defense of legal claims.

You also have the right to withdraw your consent and object to the processing at any time, for reasons relating to your particular situation, if the processing is based on our legitimate interest or the legitimate interest of a third party (including processing for direct marketing and profiling purposes). In this case, **HANTY** will cease the processing, except for legitimate grounds that override your interests.

**d) Portability of your data**

You have the right to receive the personal data you have provided to **HANTY** in a structured, commonly used, and machine-readable format, and to transmit those data to another data controller without hindrance from the controller to which you provided them, in cases legally provided for this purpose.

**e) Automated individual decisions**

Furthermore, in addition to the rights mentioned, in the event that automated decisions, including profiling, are made that have legal effects on you or significantly affect you in a similar way, you have the right to obtain human intervention from **HANTY**, to express your point of view, and to contest the decision. However, as a general rule, **HANTY** does not make individual automated decisions.

**f) Others**

You can file a complaint regarding the protection of your personal data with the Spanish Data Protection Agency at the following address: C/Jorge Juan, 6, 28001 - Madrid (www.aepd.es), if you believe that **HANTY** has violated the rights granted to you by the applicable data protection regulations. You also have the right to lodge a complaint with the competent UK authority, among others, the Information Commissioner's Office.

Finally, and as has been repeated several times in this Privacy Policy, we will resolve your requests as soon as possible and, in any case, within a maximum period of one (1) month.

## 11. SOCIAL NETWORKS

**HANTY** has corporate profiles on certain social media platforms such as Instagram or LinkedIn, among others. In accordance with the applicable data protection regulations and legislation, the company behind each social media platform is considered the data controller.

The above means that, if you decide to join our corporate profile as a follower or by giving a "Like" to our content or profile, both the company behind the social network and we will be the data controllers and, as far as we are concerned, the conditions set forth herein shall apply in relation to the processing of your personal data.

However, we inform you that there is no link between **HANTY** and these platforms or social networks, so **HANTY** is not responsible for the use or processing of your data by these social networks.

## 12. USE OF THE IMAGE

According to the GDPR, the UKDPA, the Spanish Organic Law 1/1982, of May 5th, on the protection of the right to honor, personal and family privacy, and the right to one's own image, and the case law under UK jurisdiction, we inform you that if you upload your photograph and configures it in their profile within the Platform, and decides to share their profile with other users, one of the key pieces of data that will be collected, uploaded, or stored on the Platform is precisely the User's image.

The purpose of using the image on the Platform is to provide greater visibility to the User's profile within the Platform. Therefore, when the User uses the Platform and uploads their photograph, along with accepting this Privacy Policy and the other legal texts of **HANTY**, the User expressly allows **HANTY** to use the image for these purposes and any others



related to the sharing of such content with third parties who are also part of the Platform or collaborate with it, as set forth in the terms here.

Likewise, if the User uploads their Curriculum Vitae (CV) to the platform, any photograph included in it, if applicable, will receive the same processing.

### **13. SECURITY MEASURES**

**HANTY** will always process the User's data in an absolutely confidential manner and will maintain the necessary duty of secrecy regarding the data, in accordance with the provisions of the applicable regulations. **HANTY** will implement the technical and organizational measures necessary to ensure the security of your data, prevent its alteration, loss, unauthorized processing, or access, taking into account the state of the technology, the nature of the stored data, and the risks to which it is exposed.

### **14. CHANGES**

**HANTY** reserves the right to review its Privacy Policy at any time it deems appropriate, in which case it will communicate the changes to the Users. For this reason, we kindly ask you to regularly check this privacy statement to read the most recent version of the Privacy Policy and stay fully informed about the data processing activities carried out by **HANTY**.

### **15. ACCEPTANCE AND UNDERSTANDING**

The User declares to have been informed of the conditions regarding the protection of personal data, accepting and understanding the content of this Privacy Policy. If not, please do not accept the Privacy Policy or use the Website.

### **16. COOKIES**

**HANTY** uses third-party cookies for tracking and improving certain functionalities and services. If you want to consult our policy in this regard, as well as configure the installation of cookies according to your preferences on the Website, visit our [Cookie Policy](#).

### **17. OTHER LEGAL TEXTS**

This Privacy Policy is complemented by the [Cookie Policy](#), the [Terms of Use](#) and the [Legal Notice](#). All of this is without prejudice to any other regulations or legal texts that may need



to be added, supplemented, or taken into account in compliance with the provisions of the applicable legislation at any given time.

**Copyright © HANTY SYSTEMS, S.L., 2023. All rights reserved.**