
PRIVACY POLICY

BACKGROUND:

PeopleMaps Ltd understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, www.peoplemaps.com ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. You will be required to read and accept this Privacy Policy when signing up for an Account. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

"Account"	means an account required to access and/or use certain areas and features of Our Site;
"Cookie"	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below;
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
"personal data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and
"We/Us/Our"	means PeopleMaps Limited , a limited company registered in England under company number 03904001 , whose registered address is Carrwood Park, Selby Road, Leeds, LS15 4LG, and whose main trading address is Regent Court, 70 West Regent Street, Glasgow, G2 2QZ.
"PeopleMaps Client"	PeopleMaps provides online services to clients such as recruiters, coaches and consultants. You may be registering with a PeopleMaps client, perhaps as part of a job application, or for coaching. PeopleMaps holds and manages your data on behalf of its clients as part of the commercial service PeopleMaps offers.

End User Anyone who completes the PeopleMaps personality questionnaire and registration form is an End User. Anyone who subscribes to a peopleMaps mailing list is an End User.

2. Information About Us

- 1.1 Our Site is owned and operated by PeopleMaps Limited a limited company registered in England under company number 03904001 , whose registered address is Carrwood Park, Selby Road, Leeds, LS15 4LG, and whose main trading address is] OR [of] Regent Court, 70 West Regent Street, Glasgow, G2 2QZ..
- 1.2 Our VAT number is 854 2660 19
- 1.3 Our Data Protection Officer is Martin Gibbons, and can be contacted by raising a ticket at <https://www.peplemaps.com/contact/>

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

- 1.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
 - 1.a.1 The right to be informed about Our collection and use of personal data;
 - 1.a.2 The right of access to the personal data We hold about you (see section 12);
 - 1.a.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
 - 1.a.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you.
 - 1.a.5 The right to restrict (i.e. prevent) the processing of your personal data;
 - 1.a.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 - 1.a.7 The right to object to Us using your personal data for particular purposes; and
 - 1.a.8 Rights with respect to automated decision making and profiling.
 - 1.a.9 Your right to modify or withdraw consent. How to do this is described in section 14.

- 1.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 1.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. **What Data Do We Collect?**

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data (please also see section 13 on Our use of Cookies and similar technologies and Our Cookie Policy <https://www.peoplemaps.com/cookie-policy/>)

- 1.1 name;
- 1.2 date of birth;
- 1.3 gender;
- 1.4 business/company name
- 1.5 job title;
- 1.6 profession;
- 1.7 contact information such as email addresses and telephone numbers;
- 1.8 demographic information such as post code, preferences, and interests;
- 1.9
- 1.10 IP address;
- 1.11 web browser type and version;
- 1.12 operating system;
- 1.13 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;
- 1.14 **Your** answers to the PeopleMaps personality questionnaire.
- 1.15 PeopleMaps clients may use the PeopleMaps system to collect other data from you. PeopleMaps does not control what data they may collect.

6. **How Do We Use Your Data?**

- 1.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. PeopleMaps also stores your data on behalf of its clients. peopleMaps clients may also delete your data and it is up to them how long they wish to store your data. We will comply with Our obligations and safeguard your rights under GDPR at all times. For more details on security see section 7, below.
- 1.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or

because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

- 2.a.1 Providing and managing your Account;
 - 2.a.2 Providing and managing your access to Our Site;
 - 2.a.3 Personalising and tailoring your experience on Our Site;
 - 2.a.4 Supplying Our products **AND/OR** services to you (please note that We require your personal data in order to enter into a contract with you);
 - 2.a.5 Personalising and tailoring Our products **AND/OR** services for you;
 - 2.a.6 Replying to emails from you;
 - 2.a.7 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by <<insert description of opt-out method>>);
 - 2.a.8 Market research;
 - 2.a.9 Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience;
 - 2.a.10 To market to you via advertising platforms such as Facebook, Bing, Google.
 - 2.a.11 To provide a service to PeopleMaps clients. In these circumstances the PeopleMaps client will usually be your first point of contact and you are likely to be made aware of who they are at the time of providing your consent.
- 1.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email **AND/OR** telephone **AND/OR** text message **AND/OR** post with information, news and offers on Our products **AND/OR** services. We may also use this for remarketing campaigns on platforms such as Facebook and LinkedIn. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 1.4 Third parties whose content appears on Our Site may use third party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
- 1.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 1.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
- 6.a.1 for as long as you continue to engage with PeopleMaps in some way;

6.a.2 .for as long as the PeopleMaps client that you registered with decides to hold your data.

7. **How and Where Do We Store Your Data?**

- 1.1 We only keep your personal data for as long as We (or our clients) need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 1.2 Your data may be held on one of the following platforms;
 - 2.a.1 The PeopleMaps Server, including the PeopleMaps Ticket System and the PeopleMaps inbuilt email system, which is currently with eUKHost, who are GDPR compliant. The server is located in the UK.
 - 2.a.2 HubSpot (Customer Contact Management System. This provider is also GDPR compliant)
 - 2.a.3 MailChimp - Email Management System
 - 2.a.4 Tawk.to Live Chat system (If you choose to conduct a live chat with PeopleMaps)
 - 2.a.5 Zoho - Recruitment Management System
- 1.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.
- 1.4 Steps We take to secure and protect your data include:
 - 4.a.1 Your data can only be accessed by PeopleMaps clients using a username and password
 - 4.a.2 If you are dealing directly with PeopleMaps, with some services you are provided with a custom url.

8. **Do We Share Your Data?**

- 1.1 Subject to section 8.1.5, We will not share any of your data with any third parties for any purposes. If you registered via a PeopleMaps Client, you will have been notified in advance and will have been asked to tick a box giving your consent.
- 1.2 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.
- 1.3 We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the

law.

- 1.4 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.
- 1.5 We may sometimes use third party data processors, some of which may be located outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under GDPR including:
 - 5.a.1 Each individual or organisation that has access to data is expected to sign a GDPR compliant Data Processing Agreement.
- 1.6 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.
- 1.7 Your data may be accessed by PeopleMaps employees, PeopleMaps directors, officially appointed PeopleMaps subcontractors, including outsourced technical support teams, and PeopleMaps appointed independent agents and PeopleMaps independent Distributors. Any of the above may require access to your account and your data in order to provide and support the service. Each individual or organisation that has access to data is expected to sign a GDPR compliant Data Processing Agreement. Here is a list of individuals and organisations that may have access to data;
 - a) Remote Programmer
 - b) Julie Gibbons
 - c) Tony Brown
 - d) Martin Gibbons
 - e) Anne Ellis
 - f) David Ellis

9. **What Happens If Our Business Changes Hands?**

- 1.1 We 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 Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being 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 that data only for the same purposes for which it was originally collected by Us.
- 1.2 In the event that any of your data is to be transferred in such a manner, you

will not be contacted in advance and informed of the changes.

10. **How Can You Control Your Data?**

- 1.1 When you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details and by managing your Account).
- 1.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.
- 1.3 If you registered via a PeopleMaps client, you may also contact them and request your data is deleted. PeopleMaps clients have the facility to delete data collected on their own account, directly

11. **Your Right to Withhold Information**

- 1.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
- 1.2 You may restrict Our use of Cookies. For more information, see section 13 and Our Cookie Policy <https://www.peoplemaps.com/cookie-policy/>

12. **How Can You Access Your Data, Modify it or change or remove consent?**

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at <https://www.peoplemaps.com/contact/>

12.1 If you have access to a PeopleMaps business account Control Room, you may login and view the details held by going to **>>Settings >>My Account** in your Control Room. Here you may also view the consent statements you have agreed to. you may edit your data and you may modify or remove your consent.

12.2 If you are an End User, you may contact the PeopleMaps client you registered with to access your data. Or you may contact PeopleMaps direct. You may also have an account and will be able to view the data held directly by logging into your account.

13. **Our Use of Cookies**

- 1.1 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 products **AND/OR** 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.

- 1.2 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 <<insert description of use of third party cookies, e.g. advertising services>>. For more details, please refer to section 6, above, and to section 13.6 below. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.
- 1.3 All Cookies used by and on Our Site are used in accordance with current Cookie Law.
- 1.4 Before Cookies are placed on your computer or device, you will be shown a requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- 1.5 Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in section 13.6. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 13.10, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.]
- 1.6 See our Cookie Policy page for a list of Cookies that may be placed on your computer or device <https://www.peplemaps.com/cookie-policy/> :
- 1.7 Our Site uses analytics services provided by Google, Bing, Matomo and Facebook. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the products **AND/OR** services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.
- 1.8 The analytics service(s) used by Our Site use(s) Cookies to gather the required information.
- 1.9 The analytics service(s) used by Our Site use(s) the following Cookies: See <https://www.peplemaps.com/cookie-policy/>
- 1.10 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.

- 1.11 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.
- 1.12 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.]

14. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by submitting a ticket at <https://www.peoplemaps.com/contact/>. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

15. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. You will not be notified of changes made to this privacy policy.