

PRIVACY POLICY

This is the Privacy Policy (the “Policy”) of Harod Analysis Limited a limited company registered in England and Wales with a registered company number of 10232889 and a registered address at Suite 126, 43 Bedford Street, London, WC2E 9HA (hereafter “Harod”, “we” or “us”) This Policy describes the ways in which Harod collects and uses information about you when you visit our websites at <https://harodanalysis.com> and <https://seekerxr.com> (the “Website”) or ask us to provide services to you (subject to us agreeing and entering into a service agreement in relation to such services) (the “Services”).

Harod may change this Policy at any time, in which case we shall notify you of any changes to this Policy. The changes will apply to your use of the Website and/or our Services (as applicable) after we have given notice. If you do not wish to accept the new Policy, you should not continue to use the Website and/or our Services (as applicable). If you continue to use the Website and/or our Services (as applicable) after the date on which the change comes into effect, your use of the Website and/or our Services (as applicable) indicates your agreement to be bound by the new Policy.

For the purposes of data protection legislation, Harod is the controller for the processing of your personal data. Harod has notified the Information Commissioner’s Office (“ICO”) of its processing of personal data. Harod’s registration number is ZA191152.

SECTION A – Your use of the Website

- 1. Information which is collected when you use the Website:** Harod may collect the following information from you via the Website if you choose to contact us via the Website, namely your name and e-mail address and details of your particular query, together with any other contact details that you may choose to provide to us such as your phone number, mobile number and address. We also collect information through our use of cookies as described in our cookies policy.
- 2. Processing ground:** Harod relies on the contractual necessity processing ground to collect the items of information listed in 1 above where you choose to contact us via the Website, as this information is required in order for Harod to answer your particular query. Harod relies on legitimate interests in order to place and collect the information in relation to its cookies as these cookies are either essential cookies or cookies placed by Google Analytics and hence do not impose a level of intrusiveness or risk of harm to you that could be considered to outweigh your rights and freedoms as a data subject.
- 3. How the information about you on the Website is used:** The information about you described in paragraph 1 is used by Harod to answer your particular query. The information collected through our use of cookies is collected for the purposes set out in our cookies policy.

4. SECTION B – Your use of any of our Services

5. **Information which is collected when you receive any of our Services:** Harod may collect the following information when you choose to have us provide Services to you:
- a. Information we require in order to engage you as our client, including a contact name, e-mail address, telephone number and address, together with any other details that we may require as part of our contracting process.
 - b. Information we require from you in order to provide our Services to you including:

where we provide our Social Media Profile Index (SMPI) services any and all information that you provide to us including individual(s)' full name, local version of name, date of birth, e-mail addresses, passport information and partner's full name and date of birth together with (if applicable) any and all invoicing and/or bank statement information.
6. **Processing ground:** Harod relies on the contractual necessity to collect the items of information noted in 4 above because this information is required in order to provide our Services to you.
7. **How the information about you provided in connection with our Services is used:** The information about you described in paragraph 4 above may be used by Harod as follows:
- a. to enable Harod to provide its Services to you.
 - b. to prevent fraud or illegal activities.
 - c. to use such information in anonymised form for its own research and marketing purposes; namely, to improve the way in which its Services are operated and run.
 - d. to share with third parties as described in paragraph 7 below.

SECTION C – General

8. **Sharing information with third parties:** Harod shall not pass your information to any third party (other than as described in this paragraph). Your information may, subject to Harod's obligations to comply with applicable data protection legislation, be shared with the following third parties:
- a. Dropbox, in relation to Harod's storing of information used to perform its Services.
 - b. SMPI portal, in relation to 3rd party Pre-Employment profiling (<https://smpi.harodanalysis.com/>)
 - c. having taken precautions to maintain the security of such information, Harod may share this information with its regulator. in anonymised form, Harod may share the information with:
 - i. any third party, in relation to the sale of some or all of Harod's business, or its assets, or as part of any business restructuring or reorganisation. Harod will take steps with the aim of ensuring that your rights continue to be protected if your personal data is transferred in accordance with this paragraph.

- ii. law enforcement agencies in compliance with law enforcement.
9. **Links to third party websites and third-party adverts:** Harod is not responsible for the privacy policies and practices of other sites even if you access them using links from the Website. You should check the policy of each site you visit and contact its owner or operator if you have any concerns or questions. In addition, if you link to the Website from a third party site or via a social network (e.g. Twitter), Harod is not responsible for the privacy policies and practices of the owners or operators of that third party site and recommends that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.
10. **Security:** Harod has implemented technology and policies to safeguard your privacy from unauthorised access and improper use.
11. **Storage and Data Retention:** Your information is stored by us, via our third-party storage provider, in the EEA. Our other third-party partners may store data outside the EEA and we have appropriate contracts in place to ensure the adequacy of such transfer. You can ask for your information to be removed at any time by e-mailing us at info@harodanalysis.com. We store your information for so long as we consider it reasonably necessary to do so and in accordance with our own internal data protection policy. All SMPi data is deleted from <https://smpi.harodanalysis.com> within 5 working days of submitting the report.

SECTION D – Contact and Your rights

Harod Details: If at any time, you would like to contact Harod you can do so by sending an e-mail to us at info@harodanalysis.com or write to us at “Data Protection” Query, Harod Analysis Limited, Suite 126, 43 Bedford Street, London, WC2E 9HA”. This is Harod’s registered address and we are a company incorporated in England and Wales with company number 10232889.

Your Rights: You can contact us using the details set out in the paragraph above if you wish to:

- a. access a copy of the personal data that we hold about you;
- b. correct any items of personal data that we hold about you; and/or
- c. have any items of personal data that we hold about you erased or object to our processing of such items of personal data. You may also contact the ICO at any time.