

PRIVACY AND COOKIES POLICY

Version: 180521- Effective Date: 21 May 2018

1 Who are we?

- 1.1 We are The Job Auction Ltd. We own and operate this website. Our contact details are on the website and at the end of this document. Please contact us if you have any questions or feedback about this policy.
- 1.2 We are registered with the Information Commissioner's Register of Data Controllers under number ZA232319.

2 What's the point of this policy?

- 2.1 This policy tells you how we deal with your "personal data" (i.e. technical term for information about any identified or identifiable living person). Please read on to find out what kinds of personal data we collect, how we use and protect it, to whom we disclose it and how you can access and rectify it. Please also see [How We Use Your Data](#).
- 2.2 Please do not use our website unless you are completely happy with this policy. If you do use our website, we will assume that you do accept it.

3 Might the policy change?

- 3.1 It may well do and so you should check it whenever you visit our website. We will assume you agree to the revised policy if you use the website after the effective date shown at the top of the policy.

4 What personal or other data do we collect?

- 4.1 We collect and store the information which you give us via forms on our website - such as your name and email address and so on - or when communicating with us by email or in some other way.
- 4.2 We may receive and store certain information automatically when you interact with us. Examples include the internet protocol (IP) address used to connect your computer to the internet, connection information such as browser type and version, information about your mobile or other device including device-type and device identifier, operating system and platform, a unique reference number linked to the data you enter on our system, login details, clickstream data, details of your activity on our website with date / time stamps including the pages you visited, searches you made and goods / services purchased.
- 4.3 Please also see our [How We Use Your Data](#) page.

5 What about cookies?

- 5.1 We and/or third parties use cookies and other tracking technologies on our website. A cookie is an identifier (a small file of letters and numbers) that is sent to your computer. Our website's functionality will be limited if you configure your browser to reject cookies.
- 5.2 Cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the website owner or others. Session cookies are temporary cookies that remain in the cookie file of your browser only until your browser is closed. They allow websites to link your actions during a browser session. Persistent cookies stay in the cookie file of your browser for longer (though how long will depend on the lifetime of the specific cookie). For further information on cookies, including how to use your browser to block them and how to delete cookies already stored on your device, visit: <http://www.allaboutcookies.org>.
- 5.3 Cookies are used on this website for the following purposes:
- 5.3.1 **Session cookies:** We use session cookies to enable the website to keep track of your movement from page to page and store your selections so you do not get asked repeatedly for the same information. These cookies allow you to proceed through many pages of the website quickly and easily without having to authenticate or reprocess each new area you visit. For example, the session cookie remembers your shopping cart selection so will have the items you selected when you are ready to check out.
- 5.3.2 **Google cookies:** Persistent cookies (up to two years we believe) are set in connection with the following Google services on our site and these cookies may involve certain non-personally identifying information being sent to Google:
- 5.3.2.1 **Google Analytics ("GA"):** We use cookies to recognise and count the number of website visitors as well as providing other information about the visit such as duration, route through the website and what sites the visitor came from. This information helps us to improve the way our website works, for example by making sure users find what they need easily.
More information and opt out: Click [here](#) for Google's privacy policy and [here](#) for more information about the kinds of cookies placed by Google. Click [here](#) for information about how Google uses data from its partners' sites or apps as well as how to opt out of Google cookies.
- 5.3.3 **AddThis cookies:** Our website includes third party persistent cookies (up to 2 years) set by a third party *AddThis* in connection with the *AddThis* button designed to enable sharing via social media (Facebook, Twitter etc). AddThis requires us to tell you the following: *"We allow third-party companies, including AddThis, to collect certain anonymous information when you visit our website. These companies may use non-personally identifiable information during your visits to this and other websites in order to provide advertisements about goods and services likely to be of greater interest to you. These companies typically use a cookie or a third party web beacon to collect this information. To learn more about this behavioural advertising practice, you can visit <http://www.networkadvertising.org>."* Click [here](#) for more information about AddThis

privacy practices. Click [here](#) to prevent AddThis from collecting any information about you for online behavioural advertising.

- 5.3.4 **Cookie-warning cookie:** This cookie takes note of whether you are happy to accept cookies on this website based on your response to the message which appeared when you first visited the website. This persistent cookie will remember your preference for up to 1 year.
- 5.3.5 **TimeZone Offset cookie:** This cookie saves the timezone you are in for the duration of your session. This helps us to show you the timezone offset adjusted dates and times.
- 5.4 By continuing to use our website, having seen our cookie notice, we assume that you consent to use of the cookies outlined above.

6 How do we use your personal data?

- 6.1 We use your personal data to provide our services, e.g. send service messages, process payments and/or fulfill orders.
- 6.2 We use your personal data to help us communicate with you effectively should you try to contact us via our website.
- 6.3 If you have given permission on our website, we may use your personal data to send you emails (or other communications such as mail, phone or SMS) with details of our or third party goods or services which may be of interest to you including information about special offers or promotions.
- 6.4 We may use personal data to recognize you when you visit or return to our website to track anonymised traffic and usage patterns, to prevent or detect fraud or abuses or to help us improve our website. We may use cookies to do this. See above. You can turn this off to a certain extent. Please refer to the [How We Use Your Data](#) page.
- 6.5 We retain personal data from closed accounts in order to comply with legal obligations, enforce our terms and conditions, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations and take other actions as permitted by law.
- 6.6 We may access, remove, alter, store or otherwise use any personal data if we have reason to believe that it breaches our terms and conditions, or that such steps are necessary to protect us or others, or that a criminal act has been committed, or if we are required to do so by law or appropriate authority.

7 How do we protect personal data?

- 7.1 Security is a high priority for us. We take appropriate precautions to protect personal data at all times.
- 7.2 We use strong encryption to and from our systems. Your data will be stored and processed in secure datacenters within the EU/EEA (European Economic Area). Backups of your data may be stored in an encrypted (strong) form on different systems within the EU/EEA.

- 7.3 Email and other electronic communications are not secure if they have not been encrypted. Your communications will pass through a number of network nodes before they reach us. So we do not accept responsibility for any unauthorised access to or loss of personal data that stems from a cause beyond our control. Nor can we be held responsible for the actions or omissions of other users or third parties who may misuse your personal data which they collect from the website directly (public information).

8 To whom do we disclose personal data?

- 8.1 Payment details including credit card numbers are supplied direct to our payment partner mentioned on our website. We do not store such information. To ensure your details are not being used without consent, your personal data may be supplied by our payment partners to relevant third parties including credit reference and fraud prevention agencies, who may keep a record of that information (if required by law).
- 8.2 We may allow access to your personal data by third parties who supply us with a service. Examples include e-commerce platform providers, website hosts, content delivery networks and businesses which assist us in undertaking communications or monitoring our website if you give us your consent to do so or if required for the proper functionality of the service.
- 8.3 We may allow access to some of your personal data to other users as part of our service. Such can be: A winner of one of your auctions, An owner of an auction you won, An owner of a job you applied for (employer).
- 8.4 **Very important:** Any information which you include in an advertisement or otherwise post on our site (eg. comments, ratings, user profile etc) will be available to and searchable by users of our website. This data will be 'public' by definition and available world wide (unless otherwise stated at posting time).
- 8.5 We may disclose personal data so far as reasonably necessary (and permitted by law):
- 8.5.1 if we have reason to believe that it breaches our terms and conditions, or that such steps are necessary to protect us or others, or that a criminal act has been committed, or if there has been a complaint about content posted by you, or if we are required to do so by law or appropriate authority; or
- 8.5.2 in the case of an actual or proposed (including negotiations for a) sale or merger or business combination involving all or the relevant part of our business.
- 8.6 We may store or transfer personal data outside the European Economic Area (EEA) for the purposes stated in this policy. If so, we will of course comply with the applicable laws relating to data transfer outside the EEA.
- 8.7 Except as otherwise specifically included in this policy, this document addresses only the use and disclosure of information we collect from you. If you disclose your information to third parties, whether they are suppliers of services on our website (e.g. payment providers) or other websites, different rules will apply to their use or disclosure of your information. Please check their privacy policies carefully.

9 How long will we keep your data?

9.1 We keep information while you are our customer and after you have left us. We use your information to provide you with the products and services you have selected and for a variety of other reasons.

For instance, we might need to sort out disagreements, stop fraud and abuse, prove that you had an account with us or follow our legal obligations.

In each case, the length of time that we need to keep the information may be different, but we will only keep the information for as long as we need it.

10 What else can I do to make sure my data is safe?

10.1 Along with a section on Privacy, [Get Safe Online](#) has loads of good advice about being safe online.

11 How can you access and rectify personal data?

11.1 You have the right to request personal data that we hold about you. We may charge an administration fee in line with data protection laws and we may also require appropriate evidence of identity. Note that you are able to rectify most of your personal data within your account on our service (Settings).

11.2 For information about your rights under UK data protection laws, see the website of the [UK Information Commissioner](#).

11.3 Please also see our [How We Use Your Data](#) page.

12 What are my rights?

12.1 To be informed about how we use your personal data (the purpose of this Privacy Policy);

12.2 To update your personal data. You can update or amend your information by visiting the Settings page.

12.3 To ask us to delete your personal data. However, there may be circumstances where we are legally required to retain it;

12.4 To get a free copy of your personal data. A subset of your data (limited to data that you have provided to us) is available in a machine-readable format if required;

12.5 To object to the processing of your data and have it restricted. There may be circumstances where you ask us to restrict the processing of your information, but we are legally entitled to refuse that request;

12.6 To review some automated decision-making or profiling (automated processing to determine certain things about you);

12.7 The right to make a complaint to the Information Commissioner (www.ico.org.uk) if you think that any of your rights have been infringed by us.

13 Contact Details

13.1 Data Protection Officer

The Job Auction
Data Protection Officer
40 Bank Street
Canary Wharf
London, E14 5NR

Email: data-controller@thejobauction.com