



ANKAA LIMITED PRIVACY POLICY

This Privacy Policy provides information regarding the types of personal data that we will collect from you, how we will use that data and the safeguards that we apply regarding data privacy.

INTRODUCTION

Ankaa Limited takes your privacy very seriously and we are committed to protecting your privacy in compliance with data protection laws and regulations in the United Kingdom, including the Data Protection Act 2018 and the General Data Protection Regulation (EU 2016/679) (as this was amended and incorporated into the laws of the United Kingdom by the UK European Union Withdrawal Act 2018) together with associated guidance (the "**Data Protection Laws**").

We ask that you read this Policy carefully as it contains important information about how we use, store and share the personal data we collect about you, how you can exercise your rights in respect of that personal data and the procedures that we have in place to safeguard your privacy.

If you do not agree to your personal data being used in the manner described in this Policy then please do not provide this to us.

This Policy applies to information we collect about:

- users of the My-Ankaa portal ("**My-Ankaa Users**");
- visitors to our website ("**Website Visitors**"); and
- people who work for companies who we do business with us or who we provide services to ("**Business Customer**").

This Policy does not apply to the processing of your personal data by our customers. If you are a My-Ankaa User and choose to engage with our customers (for example, an employer or recruitment agency) on the My-Ankaa portal, then our customer should provide you with another privacy policy which explains their use of your personal data.

In this Policy, the following terms have the meanings set out beside them below:

- "**Ankaa**", "**we**", "**us**" or "**our**" means Ankaa Limited, whose company registration number is 10161270 and the registered office is at 1 Park Row, Leeds, United Kingdom, LS1 5AB;
- "**Policy**" means this privacy policy; and
- "**you**" or "**your**" means the person who is a My-Ankaa User, Website Visitor or Business Customer.

THE INFORMATION WE COLLECT ABOUT YOU

We will collect some or all of the following personal data about My-Ankaa Users, Website Visitors or Business Customers, to the extent that such collection is required in accordance with the “How we use your Information” section below:

| My-Ankaa Users | Website Visitors and Business Customers |
|---|---|
| <ul style="list-style-type: none"> • Name; • Postal address; • Email address; • Next of kin name, relationship and contact details; • Telephone number; • Gender; • Date of birth; • Place of birth; • Nationality; • Relevant qualifications, certification and documentation; • Detailed work experience; • Curriculum Vitae; • Photograph; and • Passport / Driving licence. | <ul style="list-style-type: none"> • Company Name; • Company Address; • Contact Phone Number; • Contact Email address; • Company user name & email addresses; and • Photographs (Optional). |

HOW WE USE YOUR INFORMATION

We will process your personal data for the following purposes. Under the Data Protection Laws, we are required to have a “lawful basis” for processing your personal data. We have identified our lawful basis in respect of each purpose below. Where we refer to processing being in our (or a third party’s) “Legitimate Interests” please see further details in the “Our Legitimate Interests” section below.

The purposes in table A are applicable to My-Ankaa Users only. The purposes in table B are applicable to Website Visitors and Business Customers only. The purposes in table C are applicable to all My-Ankaa Users, Website Visitors and Business Customers.

Table A: My-Ankaa Users Only (please also see purposes in table C)

| Purpose | Lawful Basis |
|--|--|
| <p>Providing the My-Ankaa portal to you: When you create a profile in the My-Ankaa portal, you will be asked to provide us with information on the My-Ankaa portal. You can use the My-Ankaa portal to access and apply for vacancies with employers or recruitment and placement agencies. If you decide to engage with employers or recruitment and placement agencies via the portal, it is your choice to share your personal data with them. Their processing of your personal data is their responsibility and should be explained to you by them in a separate privacy policy.</p> | <p>This processing is necessary for the performance of a contract with you, or to take steps at your requests prior to entering into a contract.</p> |

Table B: Website Users and Business Customers (please also see purposes in table C)

| Purpose | Lawful Basis |
|---|--|
| <p>Providing Services to your organisation: We gather your personal data to enable us to provide our services to your organisation and to manage our relationship with your organisation.</p> | <p>We process your personal data in this way where it is necessary for the purposes of pursuing our (or a third party's) legitimate interests.</p> |
| <p>Marketing: We will provide you with a periodical newsletter containing information on recent developments, updates, releases, new vacancies and other relevant items. If you would rather not receive this newsletter, please unsubscribe by updating your preferences on your online account or by following the link included in any marketing emails you receive from us.</p> <p>We may provide you with information about special features of our site or any other service we think may be of interest to you. If you would rather not receive this information, please unsubscribe by updating your preferences on your online account or by following the link included in any marketing emails you receive from us.</p> | <p>We process your personal data in this way where it is necessary for the purposes of pursuing our (or a third party's) legitimate interests.</p> |

Table C: My-Ankaa Users, Website Users and Business Customers

| Purpose | Lawful Basis |
|---|---|
| <p>Service Improvement: We may use aggregated information and statistics for the purposes of monitoring site usage in order to help us to develop our sites (including our website and My-Ankaa portal) and our services. We may also provide such aggregated information to third parties. The aggregated information or statistics that we disclose for these purposes will not include information that can be used to identify you.</p> <p>We may also process your personal data to keep our site and systems safe and secure. For example, to investigate security breaches, debug or fix errors that impair our site.</p> | <p>This processing is necessary for the purposes of pursuing our (or a third party's) legitimate interests.</p> |
| <p>Feedback or Complaints: If you provide us with feedback or make a complaint about any of our services via our website, we will use your personal data to respond to you and address your concerns.</p> | <p>This processing is necessary for the purposes of pursuing our (or a third party's) legitimate interests.</p> |
| <p>Service Communications: We will use your personal data to send you information which is relevant to the services that we are providing to you (or your organisation), including:</p> <ul style="list-style-type: none"> communicating with you on any matter relating to the conduct of the instructions that you give to us from time to time; providing you with timely notifications (for example, if you are a My-Ankaa User, to tell you that your passport is about to expire); contacting you when necessary to communicate information which relates to your use of the services. | <p>This processing is necessary for the purposes of pursuing our (or a third party's) legitimate interests.</p> |
| <p>Changes to our business: Should we enter into any business arrangements, such as a joint venture with a partner, or if there is a change in our ownership or we merge with another</p> | <p>The processing is necessary for the purposes</p> |

| Purpose | Lawful Basis |
|--|--|
| company, we may share your personal data with our new owner or merger partner, although the terms of this Policy will continue to apply. | of pursuing our (or a third party's) legitimate interests. |
| <p>Compliance with laws: We may need to process your personal data to comply with laws and to respond to and comply with requests from the government, regulators and other third parties with legal authority. For example, to comply with tax requirements.</p> <p>We may also need to process your personal data to investigate, detect and prevent fraud or crime and carry out related risk assessments.</p> | This processing is necessary for our compliance with a legal or regulatory requirement. |
| <p>Legal Claims: We may process your personal data where this is required to exercise or defend legal claims. We may also use your personal data to protect our rights, property, or safety, or that of our staff, our customers, or others.</p> | This processing is necessary for the purposes of pursuing our (or a third party's) legitimate interests. |

OUR LEGITIMATE INTERESTS

We have determined, acting reasonably and considering the circumstances, that we are able to rely on legitimate interests as the lawful basis on which to process your personal data in certain circumstances (we have stated this above and set out our legitimate interests). We have reached this decision by carrying out a balancing exercise to make sure our legitimate interest does not override your privacy rights as an individual. We document the balancing exercises that we carry out when relying upon this lawful basis for processing your personal data.

We consider that it is reasonable for us to process your personal data for the purposes of our legitimate interests outlined above as: (a) we process your personal data only so far as is necessary for such purpose; and (b) it can be reasonably expected for us to process your personal data in this way.

COOKIES AND OTHER INFORMATION GATHERING TECHNOLOGIES

Our website uses cookies. Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. These cookies allow us to distinguish you from other users of the website which helps us to provide you with a good experience when you browse our website and also allows us to improve our website.

For more information on which cookies we use and how we use them, see our [Cookie Policy here](#).

SHARING YOUR INFORMATION

When processing your personal data in accordance with this Policy, we may disclose your personal data to:

- companies within our company group;
- if we are part of a merger or acquisition or joint venture, the purchasers of our business or assets or our joint venture partner;
- our professional advisors and auditors (including without limitation tax, legal or other corporate advisors who provide professional services to us);
- insolvency practitioners in the event that we are the subject of any insolvency situation (for example, administration or liquidation);

- other third party suppliers, business partners and sub-contractors for business administration, support, processing, services, or IT purposes. This includes our hosting services provider, Amazon Web Services;
- other third party suppliers for marketing purposes (for example, third party survey tools, analytics tools or tools for pushing messages to you); and
- our regulators, law enforcement or fraud prevention agencies, as well as our legal advisers, courts, the police and any other authorised bodies, for the purposes of investigating any actual or suspected criminal activity or other regulatory or legal matters.

If you are a My-Ankaa User, you may choose to share the information that you have uploaded to the portal with potential employers and recruitment and placement agencies. It is your decision whether or not to share that information on the My-Ankaa portal.

HOW WE PROTECT YOUR INFORMATION

We are committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and operational procedures to safeguard and secure the information we collect and hold about you. In particular, we protect your personal data by deploying SSL and high standard encryption algorithms.

We will use all reasonable efforts to safeguard your personal information. However, you should be aware that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the internet.

To help us protect your personal data, you agree to comply with those security policies and procedures that we make available on our website from time to time.

You also agree to take all reasonable steps to prevent the unauthorised or fraudulent use of your login details. If you suspect that anyone else knows your username and password, you must notify us immediately by contacting support@ankaa.com.

OVERSEAS TRANSFERS

In order to allow us to provide our services to you and support the operation of this site, we may have to transfer your personal data to one or more countries outside the United Kingdom which do not have statutory data protection frameworks in place that are equivalent to those in the United Kingdom.

If we transfer personal data to countries outside of the United Kingdom, we may rely on: (a) a lawful exception to the rules relating to overseas data transfers (for example, you have given your explicit consent or it is necessary to make the transfer to fulfil our contract with you); (b) a decision from the Secretary of State (or other mechanism permitted under the Data Protection Laws) determining that the country provides an adequate level of protection to the Data Protection Laws; or (c) appropriate safeguards in respect of transfers of personal data to a country outside of United Kingdom (for example, by requiring the recipient of the personal data in the other country to agree to the standard contractual clauses or international data transfer agreement approved under the Data Protection Laws).

RETAINING YOUR INFORMATION

We take steps with a view to permanently deleting, destroying or anonymising your personal data (which means that we are no longer able to identify you from it) when it is no longer necessary for the purpose that it was collected and we are not required by law to keep it.

How long we keep your personal data depends upon the purpose for which your personal data was collected was provided. Generally, we will keep the information no longer than is necessary to fulfil the purpose for which the data was collected (for example, to provide our services to you or for our legitimate internal business purposes). After that, we will only keep information about you if it is necessary for us to do so to comply with our legal obligations.

In particular, we will keep the following information for the following periods:

- **My-Ankaa User Profiles:** We will retain your personal data until you request that your profile is deleted.
- **Business Customers and Website Users:** We will retain your personal data for a period of 5 years (unless we still need to retain your details to resolve ongoing issues such as an outstanding payment or complaint you have raised).

CHANGES TO PRIVACY POLICY

We keep this Policy under regular review. If we make any changes to this Policy we will post the changes on this page, and place notices on other pages of our website or the My-Ankaa portal, so that you are made aware of the information we collect and how we use it at all times.

By continuing to use and access our website, the My-Ankaa portal or our services following such changes, you accept any Policy variation that we may have made and notified in accordance with the above arrangements. It is your responsibility to check these terms from time to time to ensure that you are aware of any changes.

This Policy was last updated in May 2022.

HOW TO CONTACT US

We welcome your views about this Policy. If you would like to contact us with any queries or comments please send an email to hello@ankaa.com.

Please contact us if you would like this Policy in another format (for example audio, large print, braille).

LINKS TO OTHER SITES

Our website contains links to other websites. This Policy applies only to this site so when you access links to other sites you should read their own privacy policies. We are not responsible for and have no liability in relation to, the services, safeguards or levels of data protection compliance that may be provided by the operators of those other sites.

YOUR RIGHTS

| Right | Description |
|----------------|---|
| To be informed | A right to be informed about the personal data we hold about you. |
| Of access | A right to access the personal data we hold about you. |

| | |
|--|---|
| To rectification | A right to require us to rectify any inaccurate personal data we hold about you. |
| To erasure | A right to ask us to delete the personal data we hold about you. This right will only apply where (for example): <ul style="list-style-type: none"> • we no longer need to use the personal data to achieve the purpose we collected it for; • where you withdraw your consent if we are using your personal data based on your consent; or • where you object to the way we process your data (in line with the right to object described below). |
| To restrict processing | In certain circumstances, a right to restrict our processing of the personal data we hold about you. This right will only apply where (for example): <ul style="list-style-type: none"> • you dispute the accuracy of the personal data held by us; • where you would have the right to ask us to delete the personal data but would prefer that our processing is restricted instead; or • where we no longer need to use the personal data to achieve the purpose we collected it for, but you need the data for the purposes of establishing, exercising or defending legal claims. |
| To data portability | In certain circumstances, a right to receive the personal data you have given us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal data to another organisation, at your request. |
| To object | A right to object to our processing of the personal data we hold about you where our lawful basis is for the purpose of our legitimate interests, unless we are able to demonstrate, on balance, legitimate grounds for continuing to process the personal data which override your rights or which are for the establishment, exercise or defence of legal claims. |
| In relation to automated decision making and profiling | A right for you not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affect you. We do not carry out any automated processing or profiling. |
| To withdraw | A right to withdraw your consent, where we are relying on it to use your personal data. |

An organisation is only required to appoint a Data Protection Officer (DPO) under the Data Protection Laws if it is a public authority, if it performs large scale monitoring or if it processes particularly sensitive types of personal data on a large scale. Based on these criteria, we have determined that we do not require a Data Protection Officer to be appointed.

We encourage you to contact us first at hello@ankaa.com if you have any queries, comments or concerns about the way we handle your personal data. However, if you are not satisfied with our handling of any request by you in relation to your rights or concerns, you also have the right to



make a complaint to our supervisory authority, which is the UK's Information Commissioner's Office. Their address is: First Contact Team, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.