### PRIVACY POLICY

This is the privacy notice of Empty State Limited. In this document, "We", "Our", or "Us" refer to Empty State Limited.

We are company number 12965836 registered in England & Wales.

Our registered office is at 2nd Floor, Stanford Gate, South Road, Brighton, BN1 6SB

## 1 Introduction

- This is a notice to inform you of our policy with regard to all information we record and process about you. It represents the conditions under which we may process any information that we collect from you, or that you provide to us. This policy also will highlight how we could potentially identify you ("personal information") and any information that could not. Significantly, the term "process" means collect, store, transfer, use or act on information.
- We are dedicated to protecting the confidentiality and privacy of information entrusted to us. We comply with the EU General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018.
- 1.3 We regret that if there are one or more conditions or points noted below, of which you are not content with, your only recourse is to leave our website immediately.
- 1.4 If you have any questions or comments about this privacy policy or how we handle personal data, please direct your correspondence to: hello@emptystate.com. We aim to respond within 30 days from the date we receive privacy related communications.
- 1.5 We take seriously the protection, privacy and confidentially of your date, ensuring this is considered at all times. We understand that all visitors to our website and any clients of ours, are entitled to know that their personal data will not be used for any purpose unintended by them, and will not be passed to or accidentally be provided to a third party without a justifiable reason.
- 1.6 You may contact the UK Information Commissioner's Office at <a href="https://ico.org.uk/concerns/handling">https://ico.org.uk/concerns/handling</a> to report concerns you may have about our data handling practices.

We do not share, or sell, or disclose to a third party, any information collected by our website. The law requires us to tell you about your rights, and we are duly bound and obliged to share details of where you may find further information. This can be found via <a href="https://www.knowyourprivacyrights.org">www.knowyourprivacyrights.org</a>.

#### 2. How and why do we collect Personal Data?

We obtain personal data direct from individuals and clients in a number of varied ways; including from individuals who provide us their business card, complete our online forms, subscribe to our regular newsletters, visit our offices or apply for job vacancies. This is list of examples is not exhaustive, therefore any directly provided information from an individual shall fall within this category.

Notably, the main reason for us to collect personal data will come directly from client services we provide, therefore any relevant types of personal data will be captured in order to fulfil a contract agreement between us and a third party client.

# 3. What types and categories of personal data do we collect?

We may obtain the following categories of personal data about individuals through our direct interactions, recruitment process and client engagements.

- Contact details (e.g. name, company name, job title, work and personal mobile phone numbers, work and personal email address)
- Professional details (e.g. job and career history, educational background and professional memberships, published articles)
- Financial information (e.g. taxes, payroll information)

## 4. How you can complain to us

If you are not happy with our privacy policy or if you have a complaint, then please contact us by email. Our address is hello@emptystate.com.

We will endeavour to resolve any dispute and we hope that a fair an appropriate level of engagement will enable a resolution with the utmost good faith.

If you are dissatisfied about how we have processed your personal information, then as previously mentioned in this privacy policy – you have a right to lodge a complaint with the Information Commissioner's Office. This can be done via their website: <a href="https://ico.org.uk/concerns">https://ico.org.uk/concerns</a>

## 5. Retention Period for Personal Data

Except as otherwise mentioned throughout this privacy notice, we keep your personal information only for the relevant required length of time. For recruitment purposes we will retain data for 3 years. In certain circumstances we must comply with applicable laws, regulations and professional obligations.

## 6. Review of this Privacy Policy:

We hold the right to update this Privacy Policy and this may be necessary from time to time. The terms that apply to you, are those that are posted here during the period of your use.

We would advise you to print a copy for your records.

Last updated: 14th June 2021