

Privacy Notice

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Introduction

Anyhr and its affiliated companies (herein together referred to as “Anyhr”, “we”, “us”, “our”) respect and realize importance of protecting your privacy. We are committed to protecting your privacy rights to the fullest possible extent.

Protecting your data and using it only in the way our visitors expect from us is our highest priority. Thus, the following Privacy Notice is designed to inform you about the processing of your personal data and your rights regarding this processing according to applicable data protection laws.

We are the controller of your personal data, meaning that we are the organization that is legally responsible for deciding how and for what purposes it is used and therefore, responsible for the data processing explained herein.

By using our website and/or application and/or other services we make available to you (the “Service”), you accept this Privacy Notice and give us your consent to the processing of your personal data described herein.

This Privacy Notice will also apply in other cases, where we make a specific reference to it, for example, in cases where we receive your personal data from third parties and are obliged to notify you about our use of your personal data.

Data We Collect

If you are a candidate to one of the positions available on our Service, we are collecting and processing the following personal data either obtained directly from you, or from public sources (such as e.g. LinkedIn): your name, phone number, email address, location, information on your CV, LinkedIn profile information, data on our communications with you. Such data is collected and processed for our recruitment endeavors to attract, assess, and onboard potential team members to our clients. This processing allows us to match candidates with suitable roles and ensure a fair and efficient hiring process. It is guided by our legitimate business interest in providing our clients with the best talents or your consent when you contact us directly through our website or on our events. We are determined to ensure that all recruitment-related data processing respects the principles of fairness, transparency, accuracy, and confidentiality, providing candidates with clarity and control over their data at all times.

If you are a contact person at a company that is our existing or potential client, we are collecting and processing the following personal data obtained either directly from you, or from public sources (such as e.g. LinkedIn): your name, phone number, email address, location, LinkedIn profile information, your role/position, history of your previous employment, data on our communications with you. Such data is collected and processed to facilitate proactive client acquisition initiatives; for cultivating and nurturing strong, collaborative relationships with our clients, including, but not limited to, facilitating communication on projects, organizing business trips and visits, and addressing any matters pertinent to the successful cooperation between us and our clients. This processing is required for our business operations, development, and growth, and ensures the efficiency and effectiveness of our client engagement processes. In this respect we rely on our legitimate interests when we communicate with potential clients to engage them or get new projects from existing clients and on the legal basis of contract conclusion and execution for data that is used to communicate with our clients during the contract conclusion and execution.

Please note that we DO NOT collect personal data that is, by its nature, particularly sensitive. This is genetic data, biometric data, data revealing racial or ethnic origin, information about political opinions, sex life, sexual orientation, religion or other beliefs, data concerning health, trade union membership or other sensitive information.

We will use your information to provide you the Service, to respond to you regarding the reason you contacted us as well as to let you know about other products and services that we offer, and products and services that our partners offer. We also use information that you provide for the following purposes:

- To communicate with you
- To improve user experience
- To improve our Service
- To improve customer service
- To administer the contractual relationships between you and us
- To process an application for a role you have given us authorization to submit you for
- To contact you for future opportunities that may be interesting to you
- To seek your views or comments on the Services

Your personal information may be added to our internal databases.

We process your personal information under the following lawful basis and for the following reasons.

Your consent	We rely on your consent when we use your personal data for optimizing and enhancing the operation of our Service, developing new features and services (including when it is collected as a part to the aggregated data), and providing you with relevant advertising materials as long as it is allowed by your device or browser's personalization and privacy settings. We also rely on this legal basis when we respond to you upon you have contacted us, for example regarding open vacancies or cooperation opportunities as well as when you attend our events. You have a right to withdraw consent to processing of your personal data. You may enjoy this right at any time you wish. Please remember, that the withdrawal of consent does not mean that the processing before the withdrawal is considered thus illegal.
Compliance with our legal obligations	We rely on this legal basis to identify you and verify your identity (when relevant) or to help prevent and detect fraud against you or us, to protect the security of systems and data, or for disclosures and other activities necessary to comply with legal and regulatory obligations that apply to our business, (e.g., to record and demonstrate evidence of your consents, to retain HR and recruitment data as well as data related to contract execution). All applicable laws depending on the relationship between you and us may affect the scope of personal data we collect, the ways we process your personal data, our ability to keep the confidentiality of your data and avoid their disclosure, duration of the planned retention, etc.

For the performance of a contract with you or to take steps at your request before entering a contract	We may rely on this ground to provide Service to you, to receive certain services from you, or to engage in contractual relations with you.
For our legitimate interests or those of a third party	We rely on this legal basis to contact you regarding potential cooperation between you and/or the company your represent with us; to inform you about our open vacancies; to make non-marketing related communications to you about changes to our terms or policies or to provide other important notices; to enable or administer our business (quality control, consolidated reporting, customer service), transfer of ownership and so on.

When we receive your explicit consent, we may run automated decision-making devices or software including those based on all the data aggregated and may use personal information we collect about you for profiling.

Marketing Communications

Where you have opted in to receive marketing communications from us, we may use your personal data to send you marketing emails about our services, including exclusive offers, promotions or new features. In using your personal data for such marketing purposes, we rely on your consent.

If a marketing email is sent to you, it includes information on how to opt out of receiving such email notifications in the future.

Safety of Your Personal Data

We adopt appropriate data collection, storage and processing organizational and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Service. Personal data that we process for any purpose(s) will not be kept for longer than is necessary for that purpose(s), including compliance with legal requirements. If you revoked your consent, we may retain certain personal information for the period required by the applicable legislation, to resolve disputes and/or enforce our rights and agreements.

Data sharing and data transfers

It is sometimes necessary for us to share your personal data to other countries (including those outside the UK and EEA). In those cases, we will comply with applicable laws designed to ensure the privacy of your personal data.

Under data protection laws, we can transfer your personal data to third countries on the basis of an adequacy regulation or, where such is not available, under legally approved standard data protection clauses recognized or issued under the applicable data protection laws. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data to third countries unless we can do so on the basis of an alternative mechanism permitted by data protection authorities.

By using our website, you consent to the transfer of information that we collect about you, including personal information, to any country in which we or our service providers are located.

We may share your information with the following recipients: our clients, our affiliated companies, professional advisers, third party providers, partners, contractors, employees for the purposes described in this Privacy Notice or notified to you. We may share your personal data with third parties for purposes such as processing employment background checks and background screening. In addition, we may share your information with competent law enforcement bodies, regulatory, government agencies, courts or other third parties where such disclosure is necessary for compliance

with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another person.

Children's privacy

Our Service are not provided for use by children. We do not knowingly collect or solicit any personal information from children under the age of 13 or 16 (depending on country requirements). If we find out that child's personal data is provided to us, we'll delete it from our databases. If you are parent or guardian of a child and believe that we have collected such personal data, please contact us as indicated in the "Contact information" section below and we'll delete it as soon as possible.

Information tracking

Service may automatically collect information about you in several ways, which includes tracking your activities through your IP address, computer settings, most-recently visited URL, operating system, date and time, your preferences and choices and saved options subject to your browser settings. This website uses your IP address to help diagnose problems with its server, and to administer the website.

Third Party Links

Our Service may contain links to third party websites. We shall not be held responsible for the privacy practices or the content of such third-party websites.

We recommend that you review privacy statements and the terms and conditions of such websites.

Changes to the Privacy Notice

We may update this Privacy Notice by publishing a new version on this website from time to time at our sole discretion. Any changes we make to this Privacy Notice will be posted on the website so that you are always aware of what information we gather, how we might use that information, and under which circumstances we may disclose it.

The date of the last modification of this Privacy Notice is stated at the beginning of this document.

Cookie Policy

As most websites, our website uses cookies to help us provide you with the best possible browsing experience.

Cookies are chosen data stored on your computer which help us to immediately recognize your PC at your next visit. Cookies automatically (i.e., not by registration) compile collective non-personal data (such as Internet browsers, operating systems, domain names, website visits, average visit time, pages per visit).

There are two main kinds of cookies: session cookies and persistent cookies. Session cookies are deleted from your computer when you close your browser, whereas persistent cookies remain stored on your computer until deleted, or until they reach their expiry date.

Please refer to our Cookie Policy for more information.

Third-party services, cookies

We may collect analytics information, or use third-party analytics tools, to help us measure traffic and usage trends for the service and to understand about the demographics and behaviors of our users, how users interact with our services.

Third-party analytics tools and retargeting cookies are used to collect information about user activities on our website for analyzing information about user web browsing behavior, for providing users ads that they are interested in, and for measurement of the effectiveness of remarketing and ad campaigns.

From time-to-time we may use: Facebook Pixel; Google Analytics; Global Site Tag, etc.

Data Storage

We ensure that the personal data are not retained longer than necessary in relation to the purpose for which they are processed. To ensure compliance with this principle, we define the retention periods applicable to each processing operation. The following elements are considered when determining the retention period:

- legal obligations;
- recommendations of supervisory authorities;
- best practices;
- our operational needs

Your Privacy Rights

Your principal privacy rights include: right to be informed about collection and use of personal data, right to access your personal data, right to rectification, right to erasure, right to restrict processing, right to object to processing, right to data portability, right to complain to a supervisory authority and right to withdraw consent.

To exercise your rights, please contact us (see “Contact Information” section below). When you send us a request to exercise a right, you are asked to specify as far as possible the scope of the request, the type of right exercised, the personal data processing concerned, and any other useful element, in order to facilitate the examination of your request. In addition, in case of reasonable doubt, you may be asked to prove your identity.

We will do our best to answer to your requests as soon as possible or within a reasonable period taking into account the complexity of the request, but in case we are processing a large number of requests the answer may take us longer than you might expect.

If at any point you believe the information we process on you is incorrect or incomplete you can submit a request to see this information and even have it corrected, ported to you or deleted by contacting us.

Contact Information

If you have any questions regarding this Privacy Notice, please contact us in our Discord.

Notice For California Residents

If you are a California resident, provisions of the Privacy Notice will apply to you subject to several additional things you need to know about processing of your personal data pursuant to California Consumer Privacy Act (“CCPA”), which went into effect on January 1, 2020.

Your Rights

Under CCPA, you have the following rights regarding your personal information:

Right to know what personal information we collect about you and the purposes of that collection, as well as know how your personal information is used: you have the right to know what personal information about you we collect, the sources from which it is collected, and the purposes for which we collect it.

Right to know with whom we share your personal information: you have the right to know whether we share your personal data with any third parties. We may share your personal information with third parties who help us run our business.

Right to know whether any of your personal information is sold: we do not sell or rent out your personal information.

Right to “Opt-Out of Sale” of your personal data: we do not sell your personal data to third parties and therefore do not offer an “opt-out” mechanism.

Right to access, request, and receive personal information: you have the right to request which personal data was collected about you and receive a copy of such information. We will disclose and deliver the required information to you in the manner described in the CCPA after receiving a verifiable request from you.

Right to request deletion of your personal data: you have the right to request deletion of your data from our systems to the extent provided by the CCPA.

We will not discriminate against you for exercising any of your CCPA rights. Please contact us if you have any further questions regarding your rights under the CCPA (see the “Contact Information” section for contact details). This should be a verifiable consumer request related to your personal information. The verifiable consumer request must provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. All requests must be labeled “California Resident Request” on the email subject line.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request. We will reply within 45 days of request receipt. If we need more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response electronically.