
PIVIGO LIMITED PRIVACY POLICY

1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1** The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to Pivigo Limited collecting/processing their personal data.
- 2.2** All employees of Pivigo Limited who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

Pivigo Limited is a data science hub. We help organisations to innovate by connecting them with the Pivigo community of data scientists.

Our Data Protection Officer can be contacted directly here:

- jason.muller@pivigo.com
- 0207 788 4710

The personal data we would like to collect from and process on you is:

Personal data type:	Source (where Pivigo Limited obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
Your work experience	Direct input from you on either the profile page or the S2DS application form OR Autofill from LinkedIn if you press the LinkedIn button on your profile or S2DS application form and subsequently agree to connect to your LinkedIn profile
First Name, Last Name, email address	Direct input from you on either the profile page or the S2DS application form OR Autofill from LinkedIn if you press the LinkedIn button on your profile or S2DS application form and subsequently agree to connect to your LinkedIn profile
Country, City	Direct input from you on either the profile page or the S2DS application form OR Autofill from LinkedIn if you press the LinkedIn button on your profile or S2DS application form and subsequently agree to connect to your LinkedIn profile
Picture, Headline or Summary statement	Direct input from you on either the profile page or the S2DS application form OR Autofill from LinkedIn if you press the LinkedIn button on your profile or S2DS

PIVIGO LIMITED PRIVACY POLICY

Skills	Direct input from you on either the profile page or the S2DS application form
Gender	Direct input from you on either the profile page or the S2DS application form. Note: we use this information only for internal statistical purposes to monitor our gender diversity.
Nationality	Direct input from you on either the profile page or the S2DS application form. Note: we use this information only for internal statistical purposes to monitor our diversity.
CV	Direct input from you on either the profile page or the S2DS application form.
Essays on your work and experience	Direct input from you on the S2DS application form
Where you heard from us	Direct input from you on the S2DS application form. Note: We use this only for marketing purposes.

The personal data we collect will be used for the following purposes:

- Assessment of eligibility for Science to Data Science (S2DS)
- Assessment of suitability for Marketplace (Freelance) Project opportunities
- Personalised content
- Networking opportunities

Our legal basis for processing the personal data:

- Assessing applications to programmes and projects
- Adding to the community of data scientists in our network
- Adding value to the community by reaching out with data science news and resources

Any legitimate interests pursued by us, or third parties we use, are as follows:

- To have people gain experience through a data science bootcamp
- To have people work on data science projects to help us develop their skills
- To offer learning resources to improve data science skills
- To have the graduates of our bootcamp, join a network of alumni
- We may need to provide data to cloud hosting services.

The special categories of personal data concerned are N/A. Pivigo does not process special category personal data.

3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Pivigo Limited to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by sending written notification.

3.3 Disclosure

Pivigo Limited will not pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:

PIVIGO LIMITED PRIVACY POLICY

Organisation Name & Geographic Location	Safeguards in place to protect your personal data	Retrieve a copy of the safeguards in place here:
Google Cloud Services	Protected Private Virtual Machines.	https://cloud.google.com/security/compliance/soc-2/ https://cloud.google.com/security/compliance/soc-3/

3.4 Retention period

Pivigo Limited will process personal data for 5 years and will store the personal data for a maximum of 8 years. Note also your right to be forgotten below.

3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Pivigo Limited (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Pivigo Limited's Data Protection Officer.

The details for each of these contacts are:

	Supervisory authority contact details	Data Protection Officer contact details
Contact Name:	Information Commissioner's Office	Jason Muller
Address line 1:	Wycliffe House	80 Coleman Street

PIVIGO LIMITED PRIVACY POLICY

Address line 2:	Water Lane	London
Address line 3:	Wilmslow	EC2R 5BJ
Address line 4:	Cheshire	
Address line 5:	SK9 5AF	
Website/email:	lco.org.uk	jason.muller@pivigo.com
Telephone:	0303 123 1113	0207 788 4710

3.7 Privacy statement

Read more about how and why we use your data here <https://www.pivigo.com/docs/privacy-policy.pdf>

4. Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

How we use your information

Pivigo uses the information you provide or that we collect to operate, maintain, enhance and provide all of the features and services found on our website, products, services and applications. We will use your email address to contact you with respect to freelance project opportunities, S2DS training materials, S2DS application correspondence, updates from your network, changes to our website or policies, notifications about events or community updates, for any administrative and customer service purposes, to address intellectual property infringement, rights of privacy, defamation issues or regarding postings.

Pivigo uses all of the information that you provide or that we collect to understand and analyse the usage trends and preference of our members, to improve the way the service works and looks, and to create new features and functionality.

Pivigo may use automatically collected information and cookies to:

- personalise our services, such as remembering your information so that you will not have to re-enter it during your visit or the next time you visit the website;
- provide customised third party content and information;
- monitor and analyse the operation and effectiveness of the website, products, services, applications and related activities;
- monitor aggregate site usage metrics such as total number of visitors and pages viewed;
- track your status in applications, training or other activities.

PIVIGO LIMITED PRIVACY POLICY

Pivigo may use your email address or other personally identifiable information to send you:

- messages about the website, products, services or applications;
- promotional messages related to the website, products, services or applications and the activities of third parties we work with;
- messages on behalf of other members who think you may be interested in the website, products, services or applications.

You will have the ability to opt-out of using any such communications, either through links provided in the messages, or by updating your member account settings through the website.

Why does Organisation Name need to collect and store personal data?

In order for us to provide you with the website, products, services and applications we need to collect personal data for correspondence purposes, to promote our services and to fulfill our legal and contractual obligations. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Pivigo will contact you for additional consent.

Will Pivigo share my personal data with anyone else?

We are not in the business of selling your information. We do, however, disclose your personally identifiable information in a variety of circumstances in connection with developing and maintaining the website, products, services and applications and operating or supporting the operation of projects and training.

By its nature, the website enables users to communicate in a variety of ways, including between members. Any personally identifiable information that you voluntarily choose to include in an area of the website accessible to other members, such as a public profile page or in a posting will be available to other members who access that content. This also applies to information you choose to make available through features that connect to third party services, if applicable. Once you make your personally identifiable information available in any of these ways, it may be collected and used by the recipients without restriction. We advise members to exercise common sense, prudence and good judgement about what personal information to make available to other through the website, products, services and applications.

Pivigo may disclose your personally identifiable information to companies offering data science projects to members, as applicable, to enable your participation in and operation of those projects.

Pivigo works with third party service providers to provide website hosting and maintenance as well as other services for us. These third parties may have access to or process your personally identifiable information as a result of performing the services they were engaged to perform. Generally these disclosures are made under terms comparable to this policy, and the recipients are limited to using the information for the purpose for which it was provided.

Pivigo may also disclose your personally identifiable information if required to do so by law or in the good-faith belief that such action is necessary to apply with applicable laws, to respond to a court order, or to

PIVIGO LIMITED PRIVACY POLICY

otherwise assist or cooperate with law enforcement activity or other similar activities in connection with internal or coordinated fraud detection and prevention, and the protection of enforcement of third party rights.

Pivigo works to provide a safe and reliable service for all members. We reserve the right to disclose your information that we believe, in good faith, is appropriate or necessary to take precautions against liability; to protect Pivigo and others from fraudulent, abusive, predatory or unlawful uses or activity; to investigate and defend ourselves against any third party claims or allegations; to protect the security and integrity of our website, products, services and applications; or to protect the rights, property or personal safety of Pivigo, our members, or others.

How will Pivigo use the personal data it collects about me?

Pivigo will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Pivigo is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Pivigo contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

Pivigo, at your request, can confirm what information we hold about you and how it is processed. If Pivigo does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Organisation Name or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.

PIVIGO LIMITED PRIVACY POLICY

- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Pivigo accepts the following forms of ID when information on your personal data is requested:
Passport, driving licence, birth certificate, utility bill (from last 3 months)

Contact details of the Data Protection Officer:

	Data Protection Officer contact details
Contact Name:	Jason Muller
Address line 1:	Pivigo Limited
Address line 2:	80 Coleman Road
Address line 3:	London
Address line 4:	EC2R 5BJ
Address line 5:	
Email:	jason.muller@pivigo.com
Telephone:	0207 788 4710

Document Owner and Approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to employees in the Employee Handbook and the online policy is published at <https://www.pivigo.com/docs/privacy-policy.pdf>.

Signature:



Date: 24/05/2018