

Privacy Policy

We are Presivio Limited t/a Co-Digi (“we”, “us”, “our”) of 29 Ashdale road, Terenure, Dublin 6W, Ireland.

We take our responsibilities under applicable data protection law, including the General Data Protection Regulation and implementing legislation very seriously. The purpose of this Privacy Policy is to inform you of the data relating to you, as a user of the Co-Digi website, that we may collect and use during the course of our relationship with you and the uses (including disclosures to third parties) we may make of such data.

If you have any questions about our use of your personal data, please contact us at the above address, or alternatively you can contact us on +353831030449, or check www.co-digi.com for further contact details.

What personal data do we collect?

Personal data is any piece of information from which a living person can be identified.

If you choose to register with us for through the website, or otherwise use one or more of our services, we may need you to provide us with personal data to allow us to provide that particular service, including the following:

- your name and contact details, including your email address, work address and telephone number;

- the information which you enter in any of our online application forms which you complete for the purpose of entering into a contract with a third party through use of the website;
- personal data relating to you in connection with our on-going relationship with you, such as via emails with you and based on the services which we are providing to you;
- where necessary (e.g. where you are seeking to qualify with one of our customers), information relating to your work and occupation, right to live and work in a particular country and any qualifications you have relevant to your work (such as documentary proof of driving license etc);
- the information which we are required to collect to carry out [anti-money laundering and] identity checks and to comply with legal obligations;
- any other personal data which you provide to us directly (e.g. where additional information is required to be collected for a particular customer for whom you ultimately work).

Website Usage Data

We collect and analyze certain statistical information about the use of our website. When you visit our website, the following information is retained about that visit:

- the Internet Protocol (IP) address from which you access the website (an IP address is a number automatically assigned to your computer when you are surfing the web);

- the previous website from which you accessed the website;
- the identity of any search engine used to access the website, and any search terms used;
- the IP address of any link used to access the website;
- the type of browser and operating system used to access the website;
- the date and time of your access to the website;
- a list of all the pages visited while on the website;
- and the page you exit the website from.

Such information is collected on an aggregate basis. None of this information is associated with you as an individual and in no way do we track individual e-mail addresses, usage of web pages or any other information personally identifying you.

Most such information is collected via cookies or other analysis technologies. To learn more about our use of cookies, please see below.

Cookies

Cookies are small data files placed on your computer or internet enabled device by websites in order to add functionality. A cookie can be used to identify a user's computer or internet enabled device to the website, or to other third party websites. Cookies help to improve the usage and effectiveness of the website, for example by remembering preferences expressed by a user or tracking a user's use of the website for statistical analysis.

If you would like to restrict the use of cookies, you can turn off the cookie acceptance option in your browser settings. Please note that disabling cookie support may prevent the website from functioning properly and you may not be able to fully utilise all of its features and services. Please see our Cookies policy for further details on the cookies that we use.

Co-Digi and our customer

Co-Digi and the ultimate customer for whom you are carrying out work are separate controllers of, and separately responsible for, your personal data. This privacy policy explains the uses we make, as Co-Digi, of your personal data and highlights, in addition, the uses of your data by our customers who make use of the Co-Digi online website.

How do we use your personal data?

Your personal data may be used by us, our group companies, the ultimate customer for whom you are carrying out work or by third party service providers acting on our or its behalf for the purposes of:

1. providing you with access to, and allowing you to make full use of, the Co-Digi website enabling you to work for one or more of our customer entities and manage your profile and qualification and training record
2. to verify your identity, employment and training record and conduct related checks on you to check that you are permitted and qualified to work
3. to respond to any questions or queries that you send to us

4. complying with legal obligations imposed on us or the ultimate customer for whom you are carrying out work
5. carrying out research (which will be carried out using aggregated and anonymised data only) which may be required to analyze trends in relevant markets
6. to provide you with information on other relevant services available to you from Co-Digi and our Group companies
7. where you have requested it, for Co-Digi to provide you with information on other potential opportunities for new or different work opportunities
8. where you have requested it, sending you newsletters and other information related to your industry, and
9. carrying out Co-digi user satisfaction surveys and Co-Digi sending you promotional and marketing materials, subject to any preference that you express when we collect your contact details or subsequently. You can opt out of receiving promotional and marketing materials from us at any time through links in our emails to you or by contacting us at the address or telephone number above.

The legal bases on which we (and our customer for whom you are ultimately working) collect, process and transfer your information in the manner described above are:

1. the performance of a contract with you
2. to take steps at your request prior to entering into a contract with you
3. our legitimate interests in conducting our business in a responsible and commercially prudent manner and enabling you to connect and qualify

for work with one or more entities. We will not process your personal data for these purposes if to do so would constitute an unwarranted interference with your own interests, rights and freedoms

4. the legitimate interests of our customers in conducting its business in a responsible, efficient and commercially prudent manner. They will not process your personal data for these purposes if to do so would constitute an unwarranted interference with your own interests, rights and freedoms,
5. to comply with legal and regulatory obligations, and
6. in limited circumstances, where you have given your consent to such processing.

Sources of Data

As well as collecting information from you directly (e.g. from your interactions with us by phone, email and letter and/or through our direct involvement with you by virtue of your agreement with us), we also receive or obtain information relating to you from, among others, the company for whom you work, as well our customer for whom you are ultimately working. We also collect information from (e.g. any publically available source), [·].

Requirement to provide data and consequences

Generally, you are not under a statutory or contractual obligation to provide us with any personal data. However, some of the information required by our application forms is necessary in order for us to comply with our obligations under applicable law and to provide services to you.

Some information is also a requirement imposed by the company who is ultimately employing the employee for whom you work (or law applicable to them) and, if you do not provide us (and thus them) with these required details, then they may not be able to allow you to work on their projects. You are also free to de-register with us at any time, however, if you remove your account, it may no longer be possible for you to work with companies who use our database.

Sharing of personal data

We may disclose your personal data to third party recipients in connection with the above purposes, including:

- as explained above, to customer entity or entities for whom you ultimately work via the Initiafy online platform
- to third parties who we engage to provide services to us or to those customers, such as web hosting providers, professional advisers, auditors, insurers and outsourced service providers
- to other members of our group or affiliates
- to third parties, their agents and professional advisors, subject to confidentiality obligations, for the purpose of a due diligence exercise by third parties in connection with any proposed merger, acquisition, re-organisation or transfer of our business and to any person proposing to participate in, promote, underwrite or manage any such arrangement, and
- to competent regulatory or other authorities and bodies as requested or required by law.

Retention

We will not hold your data for longer than is necessary. We will retain your personal data for the duration of your relationship with Co-Digi and for such a period of time after such period ends as is necessary to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise in connection with your contract.

Our customer may be required to retain information provided by you because the law requires them to and may also retain the information to deal with any claim or dispute that might arise in connection with your work.

Transfers Abroad

In connection with the above we might transfer your personal data outside the European Economic Area, including to a jurisdiction which is not recognized by the European Commission as providing for an equivalent level of protection for personal data as is provided for in the European Union. If and to the extent that we do so, we will ensure that appropriate measures are in place to comply with our obligations under applicable law governing such transfers. These may include entering into a contract governing the transfer that contains the 'standard contractual clauses' approved for this purpose by the European Commission or, in respect of transfers to the United States of America, ensuring that the transfer is covered by the EU -US Privacy Shield framework. If you would like to receive further details of the measures that we have taken in this regard, please contact us at the address or telephone number above.

At qualification for any particular customer entity, you will also be provided with information on whether any of your personal data will be transferred abroad.

Security

Your personal data is held on a secure computer and manual files shall not be processed for any other purpose than those set out in this Privacy Policy. The server Co-Digi uses to store this information is accessible to authorised staff only, is further connected to the Internet through a firewall and is therefore not accessible to the public generally.

Your rights

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to your personal data:

- the right to access your personal data
- the right to request the rectification and/or erasure of your personal data the right to restrict the use of your personal data
- the right to object to the processing of your personal data
- the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller (data portability), and

- where our processing of your personal data is based on you having provided consent, the right to withdraw your consent to the processing at any time.

Automated Decision Making

We undertake the following automated decision making:

An automated process will examine your data to check that it is complete and up-to-date (as specified by a customer that you have agreed to work with). This automation may mark your data for review by the customer who may decide to curtail or cease their work with you until the data is complete and/or up-to-date.

Queries and Complaints

We want you have confidence in how we use your data. If you have any queries or complaints in connection with our processing of your personal data, you can contact Co-Digi at the address or telephone number above.

If you are not happy with the way we have used your information or addressed your rights, you also have the right to lodge a complaint with the Irish Data Protection Commission if you are not happy with the way we have used your information or addressed your rights. Details of how to lodge a complaint can be found (<https://www.dataprotection.ie>) or you can call the Data Protection Commission at 0761 104 800.

Updates

This Privacy Policy may be amended by Co-digi from time to time. We will notify you of any material changes affecting our use of our personal data