

Privacy Policy

1 Privacy Policy

1.1 Vita Verification Pte Ltd (UEN: 202021433K), together with other members of its group ("Vita", "we", us", "our") takes its responsibilities under data protection legislation seriously.

1.2 This Privacy Policy aims to provide users of our services ("Users", "you", "your") with a clear summary of how we use information that is provided to us and how Vita complies with applicable data protection laws, covering the following areas:

Section 2: Categories of Users

Section 3: Purposes of Collection and Disclosure for Each Category of Users

- All Users
- Clients Representatives
- Applicants
- Referees

Section 4: Security and Storage

Section 5: Sub-processes

Section 6: Contacting Us and Your Rights

Section 7: Cookies

Section 8: Children's Privacy

Section 9: Changes to this Privacy Policy

2 Categories of Users

There are 3 categories of Users:

(a) Clients Representatives (i.e. representatives of organisations who engage Vita to assist them with the hiring of Applicants, referred to as Clients);

(b) Applicants (i.e. those that we help co-ordinate application information and references for potential new jobs with Clients); and

(c) Referees (i.e. those whom we contact at the request of a Applicant in connection with the obtaining of a reference about the Applicant for an Client).

3 Purposes of Collection and Disclosure

3.1 In this section, we set out first the personal information we collect relating to all Users which we are the data controller in respect of (i.e. which Vita determines how to use within the scope of this Privacy Policy without reference back to the Client). We then set out the information we may collect

as a data processor on behalf of the Client who is the data controller of that information (i.e. which we only hold and process as instructed by the Client). In relation to both categories we set out:

The personal information we collect;

How we collect the personal information; and

The purposes for which we use and disclose personal information.

Please note that this does not describe the Client's use of personal information which the Client is responsible for providing its own privacy notice or policy in respect of.

(a) Personal information we collect

- Contact Information: including your name, email address and other contact details
- Our correspondence: if you contact us, we will typically keep a record of that correspondence
- Website and communication usage: details of your visits to the websites and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access
- Reference Data input by chosen Referee's of the Applicant.

(b) How we collect personal information

We collect this personal information from you directly.

(c) Purpose of use and disclosure

We process your personal information as a data controller for the following purposes:

To provide our services to carry out our obligations arising from any agreements between you or the Client and us, to respond to your queries and otherwise communicate with you.

Legal bases: contract performance, legitimate interests (to enable us to perform our obligations and provide our services to you)

To improve our services to make our services more valuable or useful (e.g. when you have provided us with feedback), including to make our websites function correctly and undertake analytics (please see section 4 below).

Legal bases: consent, legitimate interest (to enable us to provide better services and to provide anonymised aggregated insight to our clients)

To inform you of changes to notify you about changes to our services.

Legal bases: legitimate interests (to notify you about changes to our services)

To reorganise or make changes to our business in the event that we (i) are subject to negotiations for the sale of our business or part thereof to a third party; (ii) are sold to a third party; or (iii) undergo a re-organisation, we may need to transfer some or all of your personal information to the relevant third party (or its advisors) as part of any due diligence process for the purpose of analysing any proposed sale or re-organisation. We may also need to transfer your personal information to that re-organised entity or third party after the sale or reorganisation for them to use for the same purposes as set out in this policy.

Legal bases: legitimate interests (in order to allow us to change our business)

To comply with legal or regulatory obligations we may process your personal information to comply with our legal and regulatory requirements, which may include disclosing your personal information to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.

Legal bases: legal obligations, legal claims, legitimate interests (to cooperate with law enforcement and regulatory authorities)

To third parties under our control to assist us with service delivery we may disclose your personal information to our service providers, contractors, agents, advisors (e.g. legal, financial, business or other advisors) and other Vita group companies that perform activities on our behalf always subject to suitable safeguards. Specifically, we may disclose contact information of Applicants to third parties under our control where an Client has requested identity verification services.

Legal bases: legitimate interests (in order to use specialist service providers and operate our business efficiently)

3.2 Clients Representatives

(d) Purpose of use and disclosure

We also process your personal information as a data controller for the following purposes:

For marketing purposes to send you offers and marketing materials about Vita and Vita's suppliers and partners' products and services by email or SMS, and where required by law, we will ask for your consent before we conduct any of these types of marketing. If you wish to opt out from receipt of marketing materials sent by Vita at any time, please use the opt out mechanism in the marketing material, or contact the Privacy Officer to let us know.

Legal bases: consent, legitimate interest (to keep you updated with news in relation to our services)

3.3 Applicants

(a) Personal information we collect

In addition to the information set out in the All Users section above we may collect the following additional information as a processor for the Client.

Reference Information: including your work experience, job titles, qualifications, period of employment, aptitude test results, opinions about your work performance provided by Clients and/or Referees

Sensitive Information: including information to assess your work authorisation or visa requirements (if any), criminal record (or proceedings), health or disability information.

(b) How we collect personal information (including personal information of your chosen Referees)

We collect personal information from you directly when you provide information to us relating to your references, but also collect personal information about you from your potential Client and your Referees.

As an Applicant, we will assume that you have clear consent from your chosen Referees to supply their names and contact details (including email address) to us so that we can contact them on your behalf

to obtain a reference about you which will be supplied to the Client interested in potentially hiring you. If you do not have that consent, please do not provide their details to us.

(c) Purpose of use and disclosure

Except as set out in the All Users section above, we process your personal information on behalf of your potential Client. In providing our services to the potential Client, we will use your information to communicate with you, organize your application information, coordinate your references, authenticate your identity and respond to your questions, queries or requests regarding our services. We will need to disclose your information to the Client who will be a client of Vita and will have requested us to seek references in relation to your potential enrolment by them. The Client's processing of such personal information will be subject to the privacy notice or policy of the Client.

(d) Outbound communications notice

We mask the initial request for assessment to your referees with the name provided by you. This increases the response rate, and lets the referee know who has initiated the request. The initial request and follow up reminders are the only situation in which such a masking is done, and in no other situation / at no other time. By requesting for said reference you consent to the masking of aforementioned emails with your provided name. You hereby explicitly consent to the use of your name (identity) in outgoing notification email headers sent to the referee(s), for the above stated reasons.

As an extension of our service, we retain your information to assist you in creation of an account with us. In order to enable recyclability of the reference information in your favour, and assist in future applications of several sorts as and when they become available/supported by Vita. For this purpose, your reference information and personal contactable information is stored, unless you instruct us to destroy said information. You may choose to do so, by emailing us at admin@vitaverify.me, with your contact information, and we will comply accordingly.

3.4 Referees

(a) Personal information we collect

In addition to the information set out in the All Users section we may collect the following additional information as a processor for the Client.

Employment Information: including your position, the name of the organisation you are or were working with and the dates covering the period of time in which you are providing a reference for the Applicant. In addition, we may collect your current job title, your current organisation and your current job location, but only if you consent for us to do so.

Any opinions you give on the Applicant

(b) How we collect personal information

We collect personal information from you directly:

- when you provide information to us in response to a request for reference, and/or:
- when you consent to be contacted by a prospective Client about potential job opportunities or your recruitment needs as a hiring manager.

But, we also collect personal information about you from Applicants who have asked you to provide a reference for them.

(c) Purpose of use and disclosure

Except as set out in the All Users section above, we process your personal information on behalf of the (potential) Client of the Applicant who has asked you to provide a reference for him/her. In providing our services to the Client, we will use your information to communicate with you, coordinate the opinion you provide about the Applicant, authenticate your identity and respond to your questions, queries or requests regarding our services, and where you have consented to being contacted by a potential Client we will use your information in our analytics platform, People Search. We will need to disclose your information to the potential Client who will be a client of Vita and will have requested us to seek references from you in relation to the Applicant. The Client's processing of such personal information will be subject to the privacy notice or policy of the Client.

For marketing purposes We may use your name, email address and contact details to send you more information and marketing materials about Vita and Vita's suppliers and partners' products and services by email, phone or SMS, and where required by law we will ask for your consent before we conduct any of these types of marketing. If you wish to opt out from receipt of marketing materials sent by Vita at any time, please use the opt out mechanism in the marketing material or contact the Privacy Officer to let us know.

4 Security and Storage

4.1 We hold your personal information in electronic form. To ensure your personal information is secure, your data is encrypted in transit and at rest. Service providers may process the information for us, but only ever for the sole purpose of providing our services. Where a service provider holds your information, we vet through their privacy policy to ensure the continuing protection of your personal information. Only authorised employees are granted access to your personal information and our procedures ensure that your personal information is only made available to employees where necessary.

4.2 We will retain your personal and sensitive information as directed by the Client, or where we are a data controller when we no longer require it for any purpose for which it was collected. Vita will comply with its obligations to destroy, erase, or de-identify your personal information as required by applicable law.

4.3 Vita protects the personal information in its custody or control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. You should be aware that confidentiality and security are not assured when information is transmitted through e-mail or wireless communication.

4.4 Vita will not be responsible for any loss or damage suffered as a result of a breach of security or confidentiality when information is transmitted by e-mail or wireless communication

5 Sub Processes

Vita uses 3rd party sub-processes for a wide variety of features offered to Clients and Applicants alike. Individual privacy information may be found as follows:

- AWS: <https://aws.amazon.com/compliance/gdpr-center/>
- Sendgrid: <https://sendgrid.com/resource/general-data-protection-regulation/>

6 Contacting Us and your rights

6.1 You have the right to access personal information Vita holds on you and to have incorrect information corrected. If you would like to obtain a copy of the personal information that Vita holds on you or to request a correction to personal information held by Vita, please contact our designated Privacy Officer who is accountable for Vita's compliance with this Privacy Policy. The Privacy Officer can be contacted as follows:

Email: admin@vitaverify.me

6.2 Vita holds the information set out at sections 3.4 and 3.5 as a data processor of the Client. This means that if you wish to exercise your data subject rights you must address the request to the Client and Vita will assist the Client to respond as directed by your Client. In relation to the information set out at section 3.3, Vita is the controller and in relation to that information, you may have the right to require us to:

- (a) provide you with further details on the use we make of your information;
- (b) provide you with a copy of information that you have provided to us;
- (c) update any inaccuracies in the personal information we hold;
- (d) delete any personal information the we no longer have a lawful ground to use;
- (e) where processing is based on consent, to withdraw your consent so that we stop that particular processing;
- (f) to ask us to transmit the personal data you have provided to us and we still hold about you to a third party electronically;
- (g) object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
- (h) restrict how we use your information whilst a complaint is being investigated.

7 Cookies Policy

Vita's website uses the following cookies:

sessionid: To store session data of the logged in user. This is how we identify who is logged when they request an action

jwttoken: To prevent cross site request forgery. This ensures that only forms that have originated from our Website can be used to POST data back. If you do not agree to the use of these cookies please disable them by following the instructions for your browser. Please note that some of the services will not function, and some features may not work if cookies are disabled.

Further cookies that may be relevant to the proper functioning of the Vita website and allied websites, any objection to the use of specific cookies can be raised by reaching out to us through any appropriate means available on our website.

8 Children's Privacy

Our services are not directed at people under the age of 16 (“Minors”) and we do not knowingly collect personal information from Minors. If you believe that we have been provided with personal information of Minors, please contact us by using in the information in the “Contacting Us and Your Rights” section above, and we will take steps to delete such information.

9 Changes to our Privacy Policy and/or Cookies Policy

If you do not agree with our statement and practices, we encourage you to exercise your choice of not using our sites and other digital assets. By accessing or using the Vita Platform, you agree to this Privacy Policy. We may change the content of our websites and how we use cookies and consequently, our Privacy Policy and our Cookie Policy may change from time to time in the future. If we change this Privacy Policy or our Cookies Policy, we will update the date it was last changed below.

Last update: 22/10/20