

Eazi-Business Personnel and Licensees Data Protection and Privacy Policy

Introduction

We will safeguard and respect your privacy. This data protection and privacy policy is aimed at our current, potential and past personnel or licensees (network members). See our separate [privacy policy](#) for clients, general website users and others if you are not in this category. This Policy explains the ways in which we process or use your personal data and sets out your legal rights in relation to your personal data.

This policy is subject to copyright (ours or our licensor's) and may not be copied or used or adapted for use by anyone else without written licence from us.

This policy is provided in a "layered" manner so that you can click straight through to the specific areas set out below if you wish. If your visual or other access requirements mean that you need a larger font or other format copy of this policy, please Contact Us.

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Who We Are and How to Contact Us

"We" "our" or "us" refers to the licensor company, Eazi-Business Limited. We are a limited company registered in England and Wales with registered number 08364226 and registered office at The Old School House, 65A London Rd, Oadby, Leicester LE2 5DN, UK (also using various trading names such as Eazi-Apps, Eazi-Sites, Eazi-SEO). "We" "our" or "us" also or instead refers to any group company of this company. Eazi-Business Limited is the data controller responsible for your personal data. You can contact

us at our registered office or via Contact Us [[link](#)] including for any data protection or privacy related matters or directly to our data protection manager by email to dp@eazi-business.com.

We are also the licensor company for many unrelated licensee companies that may use one or more of our trading names. We and all licensees in the network have no responsibility or liability for other licensees, who are all separate legal entities, nor for their personnel. You should refer directly to the licensee you are dealing with for any issues including in relation to data protection or privacy.

When This Policy Applies

This policy is mainly aimed at current, potential and past employees, contractors or licensees / network members (all referred to in this Policy as “you” or “personnel” even though of course no-one other than our legal employees are really our personnel). We have a separate or additional privacy policy for general users of our website or early stage potential licensees available on our websites.

This Policy does not apply to our processing of personal data of anyone with whom we have a specific contract which includes clauses or references to specific privacy policies to the extent that they override this one and in general, this Policy is additional to any other one and does not override it.

This notice does not form part of any contract of employment, contract to provide services, network member agreement, licence agreement or any other legal agreement. We recommend you to retain a copy of this policy, together with any other privacy notice we may provide on specific occasions when we collect or process personal information about you.

Data protection principles

We will comply with data protection law. This means that your personal data that we hold must be:

- used lawfully, fairly and in a transparent way
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- relevant to the purposes we have told you about and limited only to those purposes
- accurate and kept up to date
- kept only as long as necessary for the purposes we have told you about
- kept securely.

How We Obtain Your Information

We may collect any information that you provide to us yourself, for example when you:

- communicate with us for example by email, chat, applications, shared meetings or documents spaces, social media messages, comments or posts, calls, meetings, training, post, webinars or via our websites or apps or online tools or in person;
- apply to us to become an employee, service provider or licensee
- We will collect additional personal information in the course of job-related activities throughout the period of you working for us or as a licensee;
- link to or share information with any of our personnel through social media or business forums or groups (for example LinkedIn, business or industry associations or alumni networks);

- submit a CV and/or an application for a job or to become a licensee or service provider of ours and / or attend an interview or assessment with us.

We may also collect information about you from other people, for example:

- third parties including recruitment agencies, former employers or referees, credit reference agencies or other background check providers.
- the trustees or managers of human resource, payroll, insurance or pension arrangements operated by other companies.
- service providers and others: We may collect personal information from or via the people with whom we share data (see Sharing Your Information) [[link](#)];
- publicly available sources: We use publicly available sources such as search engines, listings sites, social media, websites, Companies House, Electoral Register, for instance to carry out identity and compliance checks and to gain background information and research;
- referrers: We may receive information about you from other people if you communicated to them that you would like to hear from us or from specified categories of business that include us;
- official sources: We may receive information about you from government authorities or bodies, police, crime or fraud prevention or other authorised entities.

What Information We Collect and Process

The personal information we collect and process about you may include some or all of the following:

- Information gathered from your use of our website (please see our separate Privacy Policy for website users and clients for details, which are not repeated here)
- Identity: including as examples your title, names, usernames, passwords, your date of birth, your relationship to other people, your image and / or voice, location, nationality, preferred language, gender, physical characteristics, marital status, next of kin, emergency contact details, passport, driving licence, government-issued identification information, social security numbers, tax identifiers, utility bills copies or other personal identification documents;
- Contact information: including email addresses, phone numbers, addresses, social media names or contacts;
- Your communication: including any personal data that you include in any communication by any of the methods referred to in How We Obtain Your Information [[link](#)] and in any content that you upload on to any of our online tools, websites, apps or shared online environments;
- Recruitment information (including right to work documentation, references, information included in a CV or in a licensee or personnel application or cover letter or as part of the application or recruitment process, which may include other information such as employment records, professional memberships, qualifications, academic history, work history, skills and certificates).
- Financial and benefits (current and historical): Bank account details, payroll records and tax status information, salary, compensation history, pension and benefits information
- Other employment related information (current and historical from when working with others) for example: Annual leave, working hours, dates of employment, location of employment, reasons for starting and leaving employment start date and, if different, the date of your continuous employment

- Performance information, disciplinary and grievance information, information from feedback, reviews, audits or similar or information about your behaviour, conduct or performance from colleagues or third parties including licensees or clients
- If used in our premises, CCTV or similar footage and other information obtained through electronic means such as swipe card records
- Sensitive information [[link](#)] – see later section
- Information about your use of our information and communications systems and online tools.

We may also collect, use and share aggregated data such as statistical or demographic data. This data may be derived from your personal data but is not considered personal data if it does not directly or indirectly reveal your identity. If we combine or connect this data with your personal data so that it can identify you, we do then treat the combined data as personal data in accordance with this Policy.

On What Basis We Use Your Information

We use your personal information as permitted by law. Most commonly, this will be on the basis of one or more of the following (further detail is given in What We Use Your Information for [[link](#)]):

- to enter into or perform a contract with you;
- the legitimate interests of us or a third party as a business;
- to comply with a legal or regulatory obligation;
- your consent (if needed and where we request it), although see below.

We may also use your personal information in the following situations, which are likely to be rare:

- where we need to protect your vital interests (or someone else's vital interests);
- where it is needed in the public interest or for official purposes.

Where we use your information for our legitimate interests, we consider any potential impact that such use may have on you. Our legitimate interests do not automatically override yours. We do not use your information if we think your interests should override ours unless we have other grounds to do so. If you are concerned, see Your Rights Relating to Your Information [[link](#)] or contact us if you want more information about how we balanced your rights and our legitimate interests.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

What We Use Your Information for

We may use your information for the following purposes:

- Response to enquiries: to respond to enquires you make, especially if you ask for information about becoming a licensee, employee or service provider (on the basis of our legitimate interest to respond to such enquiries and to operate a lawful business and / or on the basis of your consent if necessary and if given);
- Making a decision about entering into a contract with you whether for employment or as a licensee or service provider and determining the terms of that contract (on the basis of entering our contract with you, or otherwise on the basis of our legitimate interest to conduct our business);

- Registering you as an employee, service provider or licensee and establishing contracts or terms with you, including managing (may be via third parties) payments, fees and charges and collecting money owed by us to you or by you to us (on the basis of entering our contract with you, or otherwise on the basis of our legitimate interest to conduct our business)
- Provision of services: to fulfil our obligations to you as an employer or licensor or set out in any contract with you or in applicable terms or legislation and / or to manage payments or benefits to or from us (on the basis of performing our contract with you, or otherwise on the basis of our legitimate interest to conduct our business or to comply with legal or regulatory obligations);
- Administration: to administer all aspects of your role as an employee, licensee or service provider and to conduct our business planning, management, operations, accounting, and auditing (on the basis of performing our contract with you, or otherwise on the basis of our legitimate interest to conduct our business or to comply with legal or regulatory obligations);
- Compliance and legal obligations: to assist in complying with our legal obligations, regulations, contractual obligations, codes of conduct and our own policies and to check on your own compliance with all of these; (on the basis of our legitimate interest to conduct our business or to comply with legal or regulatory obligations);
- Monitoring and Reviews: to monitor and review your performance or the performance of any part of our business or yours as a licensee, and also to monitor our compliance for example with equal opportunities or similar requirements; (on the basis of our legitimate interest to conduct our business or to comply with legal or regulatory obligations);
- Legal, disciplinary and grievance: to investigate, conduct or defend any current or potential legal dispute involving you or others; (on the basis of our legitimate interest to conduct our business);
- Purposes set out in our separate Privacy Policy for website users and clients, which apply but are not repeated here including for example analytics of use of our online tools and websites; (on the basis of our legitimate interest to conduct our business);
- Marketing and Sales: to communicate with you about our news, events and services that we believe may interest you (either on the basis of our legitimate interests to provide you with marketing communications where we may lawfully do so (although you may opt out at any time) or your consent if we have requested it); we will not share your personal data with any third party for marketing purposes unless we have your express opt-in consent;
- Fraud and unlawful activity detection: to protect, investigate, and deter against fraudulent, unauthorised, or illegal activity, including identity fraud or money laundering (on the basis of our legitimate interests to detect and prevent illegal activities and to operate a safe and lawful business or where we have a legal obligation to do so).

Sensitive Information

Sensitive information includes information about criminal convictions and offences or “special category data” about your race or ethnicity, religious, philosophical or political beliefs or opinions, sex life, sexual orientation, trade union membership, health related information, generic or biometric data by law require higher levels of protection.

We process this type of information only if needed for you to attend our premises or events or to the extent relevant and necessary for assessing or enabling your employment or contractual relationship with us or where we need to collect it to comply with legal obligations or, less commonly, we may need to use it in relation to legal claims or to protect vital interests (yours or someone else’s).

If you are an employee of ours, we will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay, statutory sick pay, pensions and any health insurance. We need to process this information to exercise rights and perform obligations in connection with your employment.

We will take additional security precautions in relation to your sensitive data and will minimise its use, storage and processing. We may send you a separate notice if we need to process your sensitive data.

Sharing Your Information

On the lawful grounds referred to above and connected with the purposes set out, in addition to any recipients of your information described elsewhere in this Policy, we may share your personal information if relevant with third parties such as:

- Our service providers: service providers we work with to deliver our business, who act as processors and provide us with services including sub-contracted, outsourced or consultancy service providers based in the UK or EEA and our professional advisers or service providers including for legal services, documents, funding, tax advice, accounting, payroll, human resources, administrative services based in the UK plus other service providers as listed in our separate Privacy Policy for users of our website;
- Regulators and governmental bodies: HM Revenue & Customs, regulators, governmental bodies and other authorities acting as processors or joint controllers, who require reporting of processing activities in certain circumstances;
- Group companies and licensees: Our group companies or our licensees and members of our licensed network to the extent necessary either because they are providing services or products directly to you or are providing them to us;
- Standards and Industry Bodies and Associations: To the extent applicable and necessary and if a member of the association or governed by their Code of Conduct, associations or quality standards organisations or similar;
- Referrals and Publicity: any selected third party that you consent to our referring you on to or sharing your information with for marketing, licensee reference or publicity purposes;
- Buyers of our business: any actual or prospective buyer of all or part our business or assets, if we decide to sell our business or assets or to merge with them (to the extent necessary and subject to confidentiality obligations);
- Your own organisation and business and professional advisers, contacts and partners: to the extent that others (including within your organisation if you are a licensee) in an actual or potential transaction or service with you are copied or forwarded or given personal information in the course of that business, this is also sharing your information with them but will only be done in the usual and normal course of business
- Other external entities (including professional and business advisers and partners): any other third parties (including banks, funders, investors, legal, accountancy, consultancy, tax, business or other advisors, regulatory authorities, courts, law enforcement agencies and government agencies) where necessary to enable us to enforce our legal rights, or to protect the rights, property, or safety of us or our employees, or where such disclosure may be permitted or required by law or for them to help us with their services.

We require third parties to have appropriate security to protect your information from unauthorised access or processing and to treat it in accordance with all applicable law. We do not permit third-party service providers to use your personal data for their own purposes, only to process your personal data for the same specified purposes as us and in accordance with our instructions.

How We Look After Your Information

We have security procedures and policies as to how your personal information is stored and used and who has access to it. We use appropriate security features to help prevent any unauthorised person gaining access to it. Sending information via the internet, although useful and essential, is always insecure to some extent. Although we take appropriate measures to protect your personal data, we cannot guarantee its security, especially if you send or receive it via a device, method or connection that is not secured.

We aim to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services and of personal information that we hold.

We operate a policy of "privacy by design", with our systems and policies designed to take account of information security. We try to minimise the amount of personal information we hold and how long we hold it for. We use appropriate technological and operational security measures to protect your information against unauthorised access or unlawful use, which may include the following:

- physical: ensuring the physical security of our offices, equipment and devices;
- technical: ensuring the physical and digital security of our equipment and devices by using appropriate firewalls, password protection, pseudonymisation, encryption and other security;
- procedural: maintaining a privacy / data protection / information security policy for our personnel, licensees and sub-contractors and providing them with related training.

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where legally required to do so.

How Long We Keep Your Personal Information

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for or to satisfy any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation or legal disputes in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure of it, the purposes for which we process it, whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements. Please contact us if you would like more information about how long we keep your information for. In general terms:

- by law we have to keep basic information about certain people including our licensees, clients and employees or contractors (including Contact, Identity, Financial and Transaction Data) for six years after they cease paying or being paid for tax purposes.
- in some circumstances you can ask us to delete your data: see Your Rights Relating to Your Information [[link](#)].

If we anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, we may use this information indefinitely without further notice to you.

International Transfers of Your Information

Eazi-Business Ltd is registered in England, UK but its personnel, licensees and service providers may be based in other countries. Within the UK and the EEA, your personal data is protected by the General Data Protection Regulations and national implementations that reflect it or are very similar in their level of protection (including countries that are not technically within the EEA such as the UK which provides protection under the Data Protection Act 2018 and related legislation).

If you reside within the UK or EEA, we do not transfer your personal data outside the UK or EEA unless you instruct us to do so or the transfer is necessary to provide the services you requested from us or is otherwise required or permitted by law or as set out in this Policy (for example in relation to cloud or technical service providers who may be based outside the UK or EEA). If we transfer your personal data out of the UK or EEA, we ensure a similar degree of protection is in place by ensuring at least one of the following is implemented (in each case if and to the extent that legally valid at the time, bearing in mind that this has changed several times over the years due to legal court decisions):

- Your personal data is transferred to a country that the European Commission has deemed to provide an adequate level of protection for personal data. For details, search online for “European Commission: Adequacy of the protection of personal data in non-EU countries”;
- Your personal data is transferred to recipients subject to specific contracts approved by the European Commission giving protection to personal data. For details, search online for “European Commission: Model contracts for the transfer of personal data to third countries”;
- Your personal data is transferred to recipients based in the USA that are part of the Privacy Shield which requires similar protection for personal data shared between the Europe and the US. For further details, search online for “European Commission: EU-US Privacy Shield”;
- Your personal data is transferred to recipients under any other basis legally permitted at the time under the legislation applicable to us.

On request we will supply UK or EEA residents with further details on the protections for any of your personal data that is transferred or processed outside the UK or EEA. For residents in other countries, we only transfer your personal data internationally in compliance with applicable legislation.

Your Rights Relating to Your Information

We do not sell your personal data on to anyone else for their own use (this is relevant in particular if you reside in California or Nevada or any other location that restricts or prohibits the sale of personal data for others’ use). Other rights that you have under your privacy legislation are also covered by the rights referred to in this policy, which also covers the rights under UK and European legislation.

You may also have the right to complain to a data protection authority about our collection and use of your Personal Information. Depending on the country in which you reside, you may have some or all of the following data protection rights in respect of the information that we hold about you, including the following (subject to exceptions that would be notified to you at the time if applicable):

- the right to be informed of the ways in which we use your information: you are informed by this Policy, but contact us if you want more details;
- the right to ask us not to process your personal data for marketing purposes: we will comply if so requested as soon as possible;

- the right to request access to the information that we hold about you: this is commonly known as a "data subject access request" and enables you to receive a copy of personal data that we hold about you (to the extent that we are required to provide it) and to check that we are lawfully processing it. It will be helpful and faster if you could be as specific as possible about the data that you would like a copy of (including dates where possible).
- the right to request that we correct or rectify any information that we hold about you which is outdated or incorrect: we may need to verify the accuracy of the new data that you provide;
- the right to withdraw your consent for our use of your information if we are using it only in reliance of your consent: see On What Basis We Use Your Information [\[link\]](#);
- the right to object to our using your information on the basis of our legitimate interests: this right applies if there is something about your particular situation which makes you want to object to our processing on this ground (see On What Basis We Use Your Information [\[link\]](#)) and if your rights override our own legitimate grounds to process your information;
- the right to request the transfer of your personal data to you or to someone else like a new replacement service provider: where possible, we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you;
- in certain circumstances, the right to ask us to delete information we hold about you: this enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it or where you have successfully exercised your right to object to processing (see above), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. We may not always comply with your request of erasure for specific reasons which will be notified to you, if applicable, at the time;
- in certain circumstances, the right to request restriction of processing of your personal data: this enables you to ask us to suspend the processing of your personal data in the following scenarios: (i) if you want us to establish the data's accuracy; (ii) where our use of the data is unlawful, but you do not want us to erase it; (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; (iv) if you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- the right to complain about us: you have a right to complain about us in relation to your data protection and / or privacy to the UK Information Commissioner's Office (www.ico.org.uk) as well as a right to complain to the relevant authority in your country of work or residence if different. For more information, please contact your local data protection authority. We would, however, appreciate the chance to deal with your concerns ourselves before you approach any data protection authority, so please Contact Us [\[link\]](#) first.

We may need to retain certain information for our own legal and record-keeping purposes.

How to Exercise Your Rights

You may exercise your rights using the contact details referred to in Who We Are and How to Contact Us [\[link\]](#). We will comply with your request unless we have a lawful reason not to do so. It will help to get your request dealt with promptly and correctly if you could please clearly mark it in the subject matter

with "Information Privacy Request" or "Data Protection Request" or similar wording and be as specific as you can in your request in relation to what you want.

Note that your objection to processing (or withdrawal of any previously given consent) could mean that we are unable to provide you with our services or otherwise perform the actions necessary to achieve the purposes set out above (see What We Use Your Information for [\[link\]](#)). We may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal or regulatory obligations.

You may request us to cease sending you any marketing information at any time by notifying us as set out in Who We Are and How to Contact Us [\[link\]](#). Each marketing email sent to you will contain an easy, automated way for you to "opt out" and cease receiving marketing emails from us. If you have received unwanted, unsolicited marketing from us or claiming to be from us, you should please forward a copy of it with your comments to us for review.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any unauthorised person. We may also contact you to ask you for further information in relation to your request.

We will generally not charge any fee for you to access your personal data or exercise your other rights referred to. However, if your request is clearly unfounded, repetitive or excessive, we have the right to and may charge a reasonable fee or refuse to comply with your request.

Timing of our response to your requests: We will try to respond to all legitimate requests within one month. Sometimes it may take us longer if your request is particularly complex or you have made more than one request. If so, we will notify you and keep you updated.

Changes to This Policy and Your Duty to Inform us of Data Changes

It is important that the personal information that we hold about you is accurate and current. Please let us know as soon as possible if any of it changes during your relationship with us.

We will, where appropriate, notify you (this may be by changing this Policy on our website) of any material changes, for example if there is a change in the processing purpose for your data, or a change in identity of controller. If we change the purpose for which we use your personal data from the purpose for which we collected it, we will (on request) give you further information about how the new purpose is compatible with the original purpose or the legal basis for the new purpose.

We keep this Policy under review. The date that it was last updated is set out below.

As a result of our reviews, we reserve the right to make changes to this Policy from time to time. The current version of this Policy is the one published at the relevant time on our website.

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Version Date: 23.01.21