

PRIVACY POLICY

WE ARE WISER

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1 Purpose

Respecting individuals' rights to their Personal Data is really important to Wiser.

This Privacy Policy explains what we do with your Personal Data, whether we are in the process of helping you find a job, continuing our relationship with you once we have found you a role, providing you with a service, receiving a service from you, or you are simply visiting our website.

It describes how we collect, process and use your Personal Data, and how, in doing so, we comply with our legal obligations to you.

Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

This Privacy Policy applies to the Personal Data of our Website Users, Candidates, Clients, Subscribers, Suppliers, and other people whom we may contact in order to find out more about our Candidates, our Clients or whom they indicate is an emergency contact. It also applies to the emergency contacts of our Staff. If you are a member of Wiser's Staff, you should refer to Wiser's Data Protection Policy which is available on the CyberSmart platform.

We may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.

If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and, where relevant, we have described these as well.

If you came here hoping to update your marketing preferences, please email us as hello@wearewiser.com.

2 Definitions

"Candidates": includes applicants for all roles advertised by Wiser, including permanent, contract, part-time and temporary positions and freelance roles with Wiser's Clients. This also includes people who have supplied a speculative CV to Wiser not in relation to any specific job. Individual contractors, freelance workers and the employees of suppliers or other third parties put forward for roles with Wiser will be treated as candidates for the purposes of this Privacy Policy. Applicants handled by our Early Talent team in a recruitment service outsourced should refer to the privacy policies of those particular companies whom the outsourcing service is for.

"Clients": includes our customers, clients, and others to whom Wiser provides services in the course of its business.

"Contractor Programmes": Client outsourcing of the payroll/management of external staff (including freelance workers, independent contractors and temporary employees) to Wiser.

“Creative Services”: the work and assets created by our film producers, designers, developers, researchers and brand team as laid out in a statement of work agreement with a Client. We will use the best industry standards and discipline to deliver our creative service.

“Delete”: while we will endeavour to permanently erase your Personal Data once it reaches the end of its retention period or where we receive a valid request from you to do so, some of your data may still exist within our systems - for example if it is waiting to be overwritten. For our purposes, this data has been put beyond use, meaning that, while it still exists on an archive system, this cannot be readily accessed by any of our operational systems, processes or Staff.

“Early Talent Services”: Client outsourcing of the recruitment of early talent to Wiser as laid out in a statement of work agreement. We will use the best industry standards and discipline to deliver our Early Talent Services.

“GDPR”: General Data Protection Regulation – a European Union statutory instrument which aims to harmonise European data protection laws. It has an effective date of 25 May 2018, and any references to it should be construed accordingly to include any national legislation implementing it.

“Other people whom Wiser may contact”: includes Candidates' and Wiser's Staff emergency contacts and referees, as well as individuals we will interview or film during the provision of our Creative Services. We will only contact them in appropriate circumstances.

“Personal Data”: any information that relates to a living individual who can be identified from that information. Processing is any use that is made of data, including collecting, storing, amending, disclosing or destroying it.

“Subscribers”: includes individuals subscribed to our emails, communities, newsletters, events and social channels.

“Staff”: includes employees and interns engaged directly in the business of Wiser (or who have accepted an offer to be engaged) as well as certain other workers engaged in the business of providing services to Wiser (even though they are not classed as employees). For these purposes we also include affiliates of Wiser who are engaged to work on Clients' premises under Contractor Programmes. Independent contractors and consultants performing services for Wiser fall within the definition of a 'Supplier' for the purposes of this Privacy Policy.

“Suppliers”: refers to websites, partnerships and companies (including sole traders), and atypical workers such as independent contractors and freelance workers, who provide services to Wiser. In certain circumstances Wiser will sub-contract the services it provides to Clients to third party suppliers who perform services on Wiser's behalf. In this context, suppliers that are individual contractors, freelance workers, or employees of suppliers will be treated as Candidates for data protection purposes. Please note that in this context, Wiser requires Suppliers to communicate the relevant parts of this Privacy Policy (namely the sections directed at Candidates and Clients) to their employees.

“Website Users”: any individual who accesses any of the Wiser websites.

3 What kind of Personal Data do we collect?

We collect the following Personal Data:

- **Candidate Data:**
 - To provide the best possible opportunities that are tailored to you, and to put you forward for opportunities, we need to process certain information about you;
 - We only ask for details that will genuinely help us to help you, such as your name, contact details, education details, employment history, immigration status, salary expectations and any other relevant information you choose to share with us;
 - Where appropriate and in accordance with local laws and requirements, we may also collect information related to your health, diversity information or details of any criminal convictions;
 - When you access our website we will also collect anonymous data from you.
- **Client Data:**
 - If you are a Client, we need to collect and use information about you or individuals in your organisation in the course of providing you with our services, including: (i) finding Candidates who are the right fit for you or your organisation; (ii) providing you with a Contractor Programme; (iii) providing you with an Early Talent Service; (iv) producing creative media such as videos, websites, photographic assets, social media posts, designs, branded content and any other media; (v) performing research services to better understand your brand and how it is perceived internally and externally.
 - When you access our website we will also collect certain data from you.
- **Subscriber Data:**
 - If you are a Subscriber, we need to collect and use information about your communication preferences and your preferences in receiving marketing from us.
 - We also need your name and contact details so that we can communicate with you.
 - When you access our website we will also collect certain data from you.
- **Supplier Data:**
 - We need a small amount of information from our Suppliers to ensure that things run smoothly;
 - We need contact details of relevant individuals at your organisation so that we can communicate with you.
 - We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us);
 - When you access our website we will also collect certain data from you.
- **People whose data we receive from Candidates and Staff, such as referees and emergency contacts:**
 - In order to provide Candidates with suitable employment opportunities safely and securely and to provide for every eventuality for them and our Staff, we need some basic background information;
 - We only ask for very basic contact details so that we can get in touch with you either for a reference or because you've been listed as an emergency contact for one of our Candidates or Staff.
- **People whose data we receive from other sources, such as individuals we interview or film as part of our Creative Services:**
 - In order to deliver the services, we may ask you for some background information;

- We also ask for very basic contact details so that we can get in touch with you to schedule the interview or the filming.
- Website Users:
 - We collect a limited amount of data from our Website Users which we use to help us to improve your experience when using our website and to help us manage the services we provide;
 - This includes information such as how you use our website, the frequency with which you access our website, and the times that our website is most popular.

A number of elements of the Personal Data we collect from you are required to enable us to fulfil our contractual duties to you or to others.

Other items may simply be needed to ensure that our relationship can run smoothly. Depending on the type of Personal Data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our relationship.

For details of the legal basis that we rely on to be able to use and process your Personal Data, please click [here](#).

4 How do we collect your Personal Data?

- Candidate Data:
 - There are two main ways in which we collect your Personal Data: (i) Directly from you; (ii) From third parties;
 - When you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.
- Client Data:
 - There are two main ways in which we collect your Personal Data: (i) Directly from you; (ii) From third parties (e.g. our Candidates) and other limited sources (e.g. online and offline media);
 - When you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.
- Subscriber Data:
 - There are two main ways in which we collect your Personal Data: (i) Directly from you; (ii) From third parties;
 - When you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.
- Supplier Data:
 - We collect your Personal Data during the course of our work with you. When you access our website or read or click on an email from us, we may also collect certain data automatically or through you providing it to us.
- People whose data we receive from Candidates and Staff, such as referees and emergency contacts:
 - We collect your contact details only where a Candidate or a member of our Staff puts you down as their emergency contact or where a Candidate gives them to us in order for you to serve as a referee.

- People whose data we receive from other sources, such as individuals we interview or film as part of our Creative Services:
 - We collect your contact details only where you have agreed to take part in the interview or filming.
- Website Users:
 - We collect anonymous data automatically via cookies when you visit our website, in line with cookie settings in your browser.
 - If you would like to find out more about cookies, including how we use them and what choices are available to you, please click [here](#).

5 How do we use your Personal Data?

- Candidate Data:
 - The main reason for using your personal details is to help you find employment or other work roles that might be suitable for you;
 - The more information we have about you, your skillset and your ambitions, the more bespoke we can make our service;
 - Where appropriate and in accordance with local laws and requirements, we may also use your Personal Data for things like marketing, profiling and diversity monitoring;
 - Where appropriate, we will seek your consent to undertake some of these activities.
- Client Data:
 - The main reason for using information about Clients is to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly;
 - This may involve: (i) identifying Candidates who we think will be the right fit for you or your organisation; (ii) providing you with an Contractor Programme; (iii) providing you with Early Talent Services; and/or providing you with Creative Services;
 - The more information we have, the more bespoke we can make our service.
- Subscriber Data:
 - The main reason for using your Subscription Data is to:
 - keep you up to date with Wiser;
 - enable you to participate in our promotions and events;
 - to deliver relevant Creative Services and Early Talent Services content to you.
- Supplier Data:
 - The main reasons for using your Personal Data are to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly, and to comply with legal requirements.
- People whose data we receive from Candidates and Staff, such as referees and emergency contacts:
 - We use referees' Personal Data to help our Candidates to find employment which is suited to them;
 - If we are able to verify their details and qualifications, we can make sure that they are well matched with prospective employers;
 - We may also use referees' Personal Data to contact them in relation to recruitment activities that may be of interest to them.
 - We use the personal details of a Candidates or Staff member's emergency contacts in the case of an accident or emergency affecting that Candidates or member of Staff.

- People whose data we receive from other sources, such as individuals we interview or film as part of our Creative Services:
 - We use the anonymised interview data to identify and distil recurring themes for the delivery of our research services;
 - We use the film footage to deliver the Creative Services, as per the statement of work agreed with the Client.
- Website Users:
 - We use your data to help us to improve your experience of using our website, for example by analysing your recent job search criteria to help us to present jobs to you that we think you'll be interested in;
 - If you are also a Candidate or Client of Wiser, we may use data from your use of our websites to enhance other aspects of our communications with, or service to, you;
 - If you would like to find out more about cookies, including how we use them and what choices are available to you, please click [here](#).

Please note that communications to and from Wiser's Staff, including emails, may be reviewed as part of internal or external investigations or litigation.

6 Who do we share your data with?

- Candidate Data:
 - We may share your Personal Data with various parties, in various ways and for various reasons;
 - Primarily we will share your information with prospective employers to increase your chances of securing the job you want;
 - Unless you specify otherwise, we may also share your information with any of our group companies and associated third parties such as our service providers where we feel this will help us to provide you with the best possible service.
- Client Data:
 - We will share your data: (i) primarily to ensure that we provide you with a suitable pool of Candidates; (ii) to provide you with an Contractor Programme; (iii) to provide you with Early Talent Services;
 - Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers to help us meet these aims.
- Subscriber Data:
 - Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers and organisations to whom we provide services
- Supplier Data:
 - Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers and organisations to whom we provide services
- People whose data we receive from Candidates and Staff, such as referees and emergency contacts:
 - Unless you specify otherwise, we may share your information with any of our group companies and associated third parties such as our service providers and organisations to whom we provide services.

- People whose data we receive from other sources, such as individuals we interview or film as part of our Creative Services:
 - To enable us to deliver the services, your data will be processed by the internal Wiser team dedicated to the project.
- Website Users:
 - Unless you specify otherwise, we may share your information with providers of web analytics services, marketing automation platforms and social media services to make sure any advertising you receive is targeted to you.

Please note that your data may be reviewed by an external legal advisor for the purposes of ensuring that we comply with data protection legislation.

7 How do we safeguard your Personal Data?

We care about protecting your information. That's why we put in place appropriate measures (such as choosing suppliers that are ISO27001 accredited) that are designed to prevent unauthorised access to, and misuse of, your Personal Data.

7.1 How long do we keep your Personal Data for?

All interview data obtained for the purposes of delivering Creative Services will be Deleted from our systems 6 months from the relevant project completion date, unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).

For all other data we hold: If we have not had meaningful contact with you (or, where appropriate, the company you are working for or with) for a period of three years, we will Delete your Personal Data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).

For more information on our policy for the retention of Personal Data, please click [here](#).

7.2 How can you access, amend or take back the Personal Data that you have given to us?

Even if we already hold your Personal Data, you still have various rights in relation to it.

To get in touch about these, please contact us at DPO@wearewiser.com. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws.

Please note that we may keep a record of your communications to help us resolve any issues which you raise.

7.3 Your Personal Data rights

- Right to object:
 - If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object;
 - We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases);
 - Generally, we will only disagree with you if certain limited conditions apply.
- Right to withdraw consent:
 - Where we have obtained your consent to process your Personal Data for certain activities (for example, for profiling your suitability for certain roles), or consent to market to you, you may withdraw your consent at any time.
- Subject Access Requests (SAR):
 - You have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or Delete such information;
 - At this point we may comply with your request or, additionally do one of the following:
 - we may ask you to verify your identity, or ask for more information about your request;
 - where we are legally permitted to do so, we may decline your request, but we will explain why if we do so.
- Right to erasure:
 - In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your Personal Data;
 - We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply;
 - If we do agree to your request, we will Delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted;
 - That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances;
 - If you would prefer us not to do this, you are free to say so and we shall not keep a record of you on such a list.
- Right of data portability:
 - If you wish, you have the right to transfer your data from us to another data controller;
 - We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.
- Right to lodge a complaint with a supervisory authority:
 - You also have the right to lodge a complaint with your local supervisory authority;
 - The details are as below:
 - The Information Commissioner's Office;
 - Phone: 0303 123 1113;
 - Email: casework@ico.org.uk

- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

If your interests or requirements change, you can unsubscribe from part or all of our marketing content (for example job role emails or Wiser newsletters) by clicking [here](#).

7.4 How do we store and transfer your data internationally?

Wiser will only transfer data outside of the European Economic Area or EEA where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data.

7.5 Who is responsible for processing your Personal Data on Wiser's website?

Wiser controls the processing of Personal Data on its website(s).

7.6 Our legal bases for processing your data for legitimate interests

Article 6(1)(f) of the GDPR is the one that is relevant here – it says that we can process your data where it *"is necessary for the purposes of the legitimate interests pursued by [us] or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of which require protection of personal data."*

We don't think that any of the following activities prejudice individuals in any way – in fact, they help us to offer you a more tailored, efficient service, so everyone's a winner!

However, you do have the right to object to us processing your Personal Data on this basis. If you would like to know more about how to do so, please click [here](#).

Candidate Data:

- We think it's reasonable to expect that if you are looking for employment or have posted your professional CV information on a job board or professional networking site, you are happy for us to collect and otherwise use your Personal Data to offer or provide our recruitment services to you, share that information with prospective employers and assess your skills against our bank of vacancies;
- Once it's looking like you may get the job, your prospective employer may also want to double check any information you've given us (such as the results from psychometric evaluations or skills tests) or to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with local laws;
- We need to do these things so that we can function as a profit-making business, and to help you and other Candidates get the jobs you deserve;
- We want to provide you with tailored job recommendations and relevant articles to read to help you on your job hunt. We therefore think it's reasonable for us to process your data to make sure that we send you the most appropriate content;
- We also think that it might help with your job search if you take part in our specialist online training or some of our more interactive services, if you have the time. These are

- part of our service offering as a business, and help differentiate us in a competitive marketplace, so it is in our legitimate interests to use your data for this reason;
- We have to make sure our business runs smoothly, so that we can carry on providing services to Candidates like you. We therefore also need to use your data for our internal administrative activities, like invoicing where relevant;
 - We have our own obligations under the law, which it is a legitimate interest of ours to insist on meeting! If we believe in good faith that it is necessary, we may therefore share your data in connection with crime detection, tax collection or actual or anticipated litigation.
- **Client Data:**
 - To ensure that we provide you with the best service possible, we store your Personal Data and/or the Personal Data of individual contacts at your organisation as well as keeping records of our conversations, meetings, registered jobs and placements;
 - From time to time, we may also ask you to undertake a customer satisfaction survey. We think this is reasonable – we deem these uses of your data to be necessary for our legitimate interests as an organisation providing various recruitment services to you.
 - **Subscriber Data:**
 - Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our Creative Services and our Early Talent Services, to develop these services, to grow our business and to decide our marketing strategy.
 - **Supplier Data:**
 - We use and store the Personal Data of individuals within your organisation in order to facilitate the receipt of services from you as one of our Suppliers;
 - We also hold your financial details, so that we can pay you for your services;
 - We deem all such activities to be necessary within the range of our legitimate interests as a recipient of your services.
 - **People whose data we receive from candidates and staff, such as referees and emergency contacts:**
 - If you have been put down by a Candidate or a prospective member of Staff as one of their referees, we use your Personal Data in order to contact you for a reference. This is a part of our quality assurance procedure and so we deem this to be necessary for our legitimate interests as an organisation offering recruitment services and employing people ourselves;
 - If a Candidate or Staff member has given us your details as an emergency contact, we will use these details to contact you in the case of an accident or emergency;
 - We are sure you will agree that this is a vital element of our people-orientated organisation, and so is necessary for our legitimate interests.
 - **People whose data we receive from other sources, such as individuals we interview or film as part of our Creative Services:**
 - If you have volunteered to be involved, we will use your Personal Data to contact you. This is so that we can schedule the interview or the filming.

7.7 Consent

In certain circumstances, we are required to obtain your consent to the processing of your Personal Data in relation to certain activities.

Depending on exactly what we are doing with your information, this consent will be opt-in consent or soft opt-in consent.

Article 4(11) of the GDPR states that (opt-in) consent is "*any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her*".

In plain language, this means that:

- you have to give us your consent freely, without us putting you under any type of pressure;
- you have to know what you are consenting to – so we'll make sure we give you enough information;
- you should have control over which processing activities you consent to and which you don't;
- you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

We will keep records of the consents that you have given in this way.

We have already mentioned that, in some cases, we will be able to rely on soft opt-in consent. We are allowed to market products or services to you which are related to the recruitment services we provide as long as you do not actively opt-out from these communications.

As we have mentioned, you have the right to withdraw your consent to these activities.

You can do so at any time, and details of how to do so can be found by contacting us [here](#).

7.8 Establishing, exercising or defending legal claims

Sometimes it may be necessary for us to process Personal Data and, where appropriate and in accordance with local laws and requirements, sensitive Personal Data in connection with exercising or defending legal claims.

Article 9(2)(f) of the GDPR allows this where the processing "*is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity*".

This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

7.9 What are cookies and how do we use them?

A "cookie" is a bite-sized piece of data that is stored on your computer's hard drive.

They are used by nearly all websites and do not harm your system.

We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website.

We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit.

We can also use cookies to analyse traffic and for advertising purposes.

If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

If you want to find out more about cookies, including how we use them and what choices are available, please click [here](#).

7.10 How to reject cookies?

If you don't want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings.

Most web browsers will accept cookies but if you would rather we didn't collect data in this way you can choose to accept all or some, or reject cookies in your browser's privacy settings.

However, rejecting all cookies means that you may not be able to take full advantage of all our website's features.

Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.