



# Privacy Policy

**Effective 1<sup>st</sup> March 2024**

**Version 2.0**

Polyglot Group Pty Limited, Polyglot Group EURL, Polyglot Group Africa Pty Ltd, and Polyglot Group Inc (collectively “we, us, our”, Polyglot Group) is committed to protecting and respecting your privacy.

Our Privacy Policy and any other documents referred to in it sets out how we collect, use, maintain and disclose (“processing” or “process”) your personal information. Our Policy has been developed in accordance with our requirements under the Privacy Laws where we operate.

Please read the following carefully to understand our processing activities regarding your personal information and how we will treat it. Our Privacy Policy also explains your privacy rights in relation to our processing activities.

If you have any questions or concerns about our use of your personal information, please contact us using the contact details provided at the end of this Privacy Policy.

## Scope

Our Privacy Policy applies to the processing of personal information by Polyglot Group of:

- visitors and users of our Polyglot Group website <https://www.thepolyglotgroup.com/> and our social media pages (collectively referred to as “Sites”).
- our clients and prospective clients, their representatives and employees,
- candidates or potential candidates for employment opportunities, and,
- subscribers to Polyglot Group publications and newsletters.

# How we collect your personal information

## Candidates

We may collect your personal information when you submit or send us your personal data as part of your application for a job listing. By submitting your personal information for this purpose, you are providing your consent for us to process your personal information.

Where we have a legitimate business interest, we may collect personal information about you from publicly available sources such as LinkedIn, SEEK, Indeed or other job portals. If this occurs, we shall request your consent to our collection and processing of your personal data.

Additionally, we may collect personal information about you from third parties as we perform our talent acquisition services, and internal recruitment including but not limited to, personal information from, referees, governmental agencies, credit and background check providers.

## Client's Employees

We may receive personal information from our clients about their current, former and prospective employees as well as employee dependents and family members, as needed to perform our Services and meet our contractual obligations with our clients.

Polyglot Group will only collect and process your personal information as specifically instructed by our clients (your current, former or prospective employer) or with your consent.

Our clients will be responsible for gathering your consent to us processing your personal data.

## Site users

We may collect your personal information when you interact with our website or social media pages. For further information regarding our collection of your personal information when you interact with our website, please see our [Cookies Policy](#).

## Marketing

We may collect your personal information when you sign up to our marketing services (i.e., our Newsletter) or participate in Polyglot Group studies or surveys.

## **What personal information we collect or receive**

### **Candidates**

To perform our talent acquisition services or recruiting internally, we may collect or receive information about you that you provide to us such as: your name, contact details, current and previous places of employment, your qualifications and education history, geographical location, identification documents, images and visa information.

When we receive information directly from you that relates to your: ethnicity, race, nationality, trade union membership, political associations, religious or philosophical beliefs, health or genetic information and/or criminal record (collectively “sensitive personal information”), your submission will be considered as providing us with your consent to process your sensitive personal information.

We will not process your sensitive personal information without your consent.

### **Client’s Employees**

To perform our contractual obligations with our clients, we may collect or receive information relating to your name, contact details, place and length of employment, employment personnel records, banking information, salary, wage and other financial information, identification documents and geographical location.

Unless absolutely necessary we will not request that our clients share with us your sensitive personal information. If we do request such information in order to meet our contractual obligations, our clients (your employer or prospective employer) will be responsible for gathering your consent to us processing your sensitive personal information.

### **Site users, study participants and subscribers**

We collect the following personal information from you when you interact with our Sites (and corresponding forms): name, e-mail address, postal address and telephone number. Additionally, we will collect the personal information you provide us when you register, and/or participate in our studies or surveys, or generally contact us.

We collect very specific data which we use to improve your browsing experience, as well as to help us with the management of our services. Among this can be found information on how to use the website, the frequency with which it is accessed, the hours with the greatest traffic, the type of browser users choose, the place from which it is visited, the language in which the website is consulted, for further information please refer to our [Cookies Policy](#).

## How we will use your personal information

### Services

We may use your personal information to perform our services and meet our contractual obligations to you, our clients, suppliers and/ or partners.

### Marketing

We may use your personal information to administer subscriptions to our publications and newsletters, market to you our products and services or related products and services, and to tailor our marketing and sales activities to your or your company's interests.

### Legal proceedings

In exceptional cases, we may use your personal data for the exercise or defence of a right in legal proceedings.

## How we store your personal information

We take reasonable technical and organisational precautions to protect your personal information from unauthorised access and against unlawful processing, accidental loss, destruction and damage. We will only keep your personal information for as long as we reasonably require and, in any event, only for as long as applicable Privacy laws (also referred to as "Data Protection Legislation") allows.

## Disclosure of your personal information

### Performance of services

In order to provide our services, we may share your personal information and your references with our employees, officers, agents, suppliers, subcontractors, service providers, third-party partners, your employer or prospective employer (and their employees, agents and officers). Disclosure to such recipients will occur only where we have a lawful basis to do so. We require these recipients to treat your personal information securely and in accordance with the Data Protection Legislation.

### Government disclosure

When compelled by a government agency, we may share your personal information in accordance with the law. Additionally, where our services involve disclosure of your personal information to government agencies, we will disclose your personal information in accordance with the law.

## Marketing

If you have consented, we may allow carefully selected third parties, including marketing and advertising companies, or our business partners (including other members of our corporate group) to contact you occasionally about services that may be of interest to you. They may contact you by telephone, post, SMS as well as by e-mail.

If you change your mind about being contacted by these companies in the future, please let us know by contacting us using the details set out in the **Contact Us** section below and/or changing your account settings on our site. You may also opt out of receiving any marketing communications you receive by following the instructions outlined in any of our communications.

## International Transfers

By default, we will not internationally transfer your personal information to countries that are not considered as 'safe countries' in terms of data protection according to the Data Protection legislation applicable to each of our Polyglot Group entities.

If international data transfers are necessary for the provision of the service(s), we will take reasonable steps to ensure that your personal information which is transferred overseas is protected by comparable privacy standards to the jurisdiction where it was collected or received. These reasonable steps include but are not limited to:

- transferring your personal information to a country that has an adequacy decision from the European Commission, or,
- using the Standard Contractual Clauses adopted by the European Commission and the EU-US Data Privacy Framework as a mechanism to guarantee that personal information being transferring to a country without an adequacy decision is protected with comparable privacy standards.

When it comes to international transfers in any case, the third parties with whom certain data of a personal character is shared will have previously confirmed the adoption of technical and organisational measures that are adequate for the correct protection of them.

Under no circumstances will we sell your personal information to third parties.

## Who is responsible for processing your personal information:

Polyglot Group are responsible for processing your personal information described in our Privacy Policy. Please see below for the list of our Polyglot Group entities and their registered addresses.

|  |   |
|--|---|
| <b>Oceania</b><br>Polyglot Group Pty Limited | 25 Burton Street, Glebe NSW 2037<br>ACN 088 338 523                 |
| <b>Europe</b><br>Polyglot Group EURL         | 4 Rue de la Bienfaisance, Paris 75008<br>SIREN 838 088 532          |
| <b>Africa</b><br>Polyglot Africa Pty Limited | 6 Spin St, 1st Floor CBD, Cape Town 8001<br>2017 / 015025 / 07      |
| <b>North America</b><br>Polyglot Group Inc   | 490 Post Street – Ste 640, San Francisco, CA 94102<br>EIN 352615452 |

Please refer any enquires relating to our processing of your personal information to the Contact Us section of this Policy.

## Third-party websites

Our Sites may contain links to other websites. These websites have their own privacy policies. We are not responsible for these websites or their privacy policies. Please check these policies before you submit any personal information via these websites.

## Information relating to children.

Our Services are not directed at anyone under the age of 18 years old (“Children”).

We do not knowingly collect personally identifiable information directly from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with their personal information, please contact us. If we become aware that we have collected personal information from Children without verification of parental consent, we will take steps to remove that information from our servers.

## Your Rights

You can exercise your data subject rights in accordance with applicable laws by filling out our [data subject rights form](#). You have multiple rights, subject to applicable laws, with respect to how we process your personal information. Any data subject rights request will be evaluated against our contractual obligations and any applicable laws.

**Right of access:** You have the right to request us for copies of your personal information.

**Right to rectification:** You have the right to request that we correct any of your personal information that you believe is inaccurate. You also have the right to request that we complete information about you that you believe is incomplete.

**Right to erasure:** You have the right to request that we erase your personal information, under certain conditions.

**Right to restrict processing:** You have the right to request that we restrict our processing of your personal information, under certain conditions.

**Right to data portability:** You have the right that we transfer your personal information that we have collected to another organisation, or directly to you, under certain conditions.

**Right to object:** You have the right to object to our processing of your personal information, under certain conditions.

**Automated individual decision-making:** You have the right to request that you not be subject to a decision based solely on automated processing, including profiling, if that decision produces legal effects concerning you or significantly affects you in a similar way, under certain conditions.

We reserve the right to refuse your request where we have determined that your request is contrary to applicable law, or is considered to be manifestly unfounded or excessive.

## Our supervising authorities

If you wish to lodge a formal complaint regarding our processing activities, you have a right to make a complaint to the following authorities:

| Entity                     | Supervising Authority                                  |
|----------------------------|--|
| Polyglot Group Pty Limited | Office of the Australian Information Commissioner      |
| Polyglot Group EURL        | Commission nationale de l'informatique et des libertés |
| Polyglot Africa Pty Ltd    | Information Regulator (South Africa)                   |
| Polyglot Group Inc         | California Privacy Protection Agency                   |

## Updating and modifications to this Policy

We reserve the right to modify or update this Policy at any time without prior notice. We will notify you of any changes by posting the new Privacy Policy on our website.

You are advised to review our Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on our website.

## Contact Us

If you have any questions, inquiries or complaints about our Privacy Policy or our processing activities of any of our entities, please contact us at:

**Polyglot Group Data Protection Officer**

Polyglot Group Pty Limited  
25 Burton Street, Glebe NSW  
Australia 2037.

[dpo@thepolyglotgroup.com](mailto:dpo@thepolyglotgroup.com)

*European Economic Area-based, United Kingdom and Switzerland residents may also contact us at:*

**Polyglot Group EU representative**

Polyglot Group EURL  
4, rue de la Bienfaisance, Paris,  
France 75008,  
[eurepresentative@thepolyglotgroup.com](mailto:eurepresentative@thepolyglotgroup.com)