



DATA PROTECTION POLICY

Introduction

The Skillcast Group plc (the "Group") is committed to a policy of protecting the rights and privacy of individuals, in accordance with the UK GDPR and EU GDPR (and "GDPR" shall be used to refer to both unless the context specifically states otherwise). GDPR contains provisions that the Group needs to be aware of as data controllers for certain information about its staff, customers, suppliers, and other individuals with whom it has a relationship for various purposes.

Furthermore, the Group acts as the data processor for storage and handling the information about the end users of its products under the terms of the Data Processing Agreements signed with its clients.

To comply with various legal obligations, including the obligations imposed on it by GDPR, the Group ensures that all information about individuals is collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully.

This Data Protection Policy sets out how the Group handles the Personal Data of our customers, suppliers, employees, workers and other third parties. This Data Protection Policy applies to all Personal Data we Process regardless of the media on which that data is stored or whether it relates to past or present employees, workers, customers, clients or supplier contacts, shareholders, website users or any other Data Subject.

This Data Protection Policy applies to all Skillcast Personnel. You must read, understand, and comply with this Data Protection Policy when Processing Personal Data on our behalf and attend training on its requirements. This Data Protection Policy sets out what we expect from you for Skillcast to comply with applicable law. Your compliance with this Data Protection Policy is mandatory. Related Policies and Privacy Guidelines are available to help you interpret and act in accordance with this Data Protection Policy. You must also comply with all such Related Policies and Privacy Guidelines. Any breach of this Data Protection Policy may result in disciplinary action. Any failure to comply with this Data Protection Policy may be treated as a disciplinary offence.

Where you have a specific responsibility in connection with Processing such as capturing Consent, reporting a Personal Data Breach, conducting a DPIA as referenced in this Data Protection Policy or otherwise then you must comply with the Related Policies and Privacy Guidelines.

This Data Protection Policy (together with Related Policies and Privacy Guidelines) is an internal document and cannot be shared with third parties, clients or regulators without prior authorisation from the DPO.

Scope

We recognise that the correct and lawful treatment of Personal Data will maintain confidence in the organisation and will provide for successful business operations. Protecting the confidentiality and integrity of Personal Data is a critical responsibility that we always take seriously. Skillcast is exposed to potential fines of up to £17.5 million / €20 million or 4% of total worldwide annual turnover, whichever is higher and depending on the breach, for failure to comply with the provisions of the UK GDPR and EU GDPR.

All CEOs, individual business areas, units, departments, and supervisors are responsible for ensuring all Skillcast Personnel comply with this Data Protection Policy and need to implement appropriate practices, processes, controls, and training to ensure that compliance.

The DPO is responsible for overseeing this Data Protection Policy and, as applicable, developing Related Policies and Privacy Guidelines. That post is held by Tracey Coetzee, available by writing to dpo@skillcast.com.

Please contact the DPO with any questions about the operation of this Data Protection Policy or the GDPR or if you have any concerns that this Data Protection Policy is not being or has not been followed. You must always contact the DPO in the following circumstances:



- a) if you are unsure of the lawful basis which you are relying on to process Personal Data (including the legitimate interests used by Skillcast) (see paragraph 5.1);
- b) if you need to rely on Consent and/or need to capture Explicit Consent (see paragraph 6);
- c) if you need to draft Privacy Notices (see paragraph 7);
- d) if you are unsure about the retention period for the Personal Data being Processed (see paragraph 11);
- e) if you are unsure about what security or other measures you need to implement to protect Personal Data (see paragraph 12.1);
- f) if there has been a Personal Data Breach (paragraph 13);
- g) if you are unsure on what basis to transfer Personal Data outside the UK (see paragraph 14);
- h) if you need any assistance dealing with any rights invoked by a Data Subject (see paragraph 15);
- i) whenever you are engaging in a significant new, or change in, Processing activity which is likely to require a DPIA (see paragraph 19) or plan to use Personal Data for purposes other than what it was collected for;
- j) if you plan to undertake any activities involving Automated Processing including profiling or Automated Decision-Making (see paragraph 20);
- k) if you need help complying with applicable law when carrying out direct marketing activities (see paragraph 21); or
- l) if you need help with any contracts or other areas in relation to sharing Personal Data with third parties (including our vendors) (see paragraph 22).

Definitions

- Automated Decision-Making (ADM): when a decision is made which is based solely on Automated Processing (including profiling) which produces legal effects or significantly affects an individual. The GDPR prohibits Automated Decision-Making (unless certain conditions are met) but not Automated Processing.
- Automated Processing: any form of automated processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to an individual, in particular to analyse or predict aspects concerning that individual's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements. Profiling is an example of Automated Processing.
- Skillcast Personnel: all employees, workers, contractors, agency workers, consultants, directors, members and others.
- Consent: agreement which must be freely given, specific, informed and be an unambiguous indication of the Data Subject's wishes by which they, by a statement or by a clear positive action, signify agreement to the Processing of Personal Data relating to them.
- Controller: the person or organisation that determines when, why and how to process Personal Data. It is responsible for establishing practices and policies in line with the GDPR. We are the Controller of all Personal Data relating to our Skillcast Personnel and Personal Data used in our business for our own commercial purposes.
- Criminal Convictions Data: means personal data relating to criminal convictions and offences and includes personal data relating to criminal allegations and proceedings.
- Data Subject: a living, identified or identifiable individual about whom we hold Personal Data. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal Data.
- Data Privacy Impact Assessment (DPIA): tools and assessments used to identify and reduce risks of a data processing activity. DPIA can be carried out as part of Privacy by Design and should be conducted for all major system or business change programmes involving the Processing of Personal Data.
- Data Protection Officer (DPO): the person required to be appointed in specific circumstances under the GDPR. Where a mandatory DPO has not been appointed, this term means a data protection manager or other voluntary appointment of a DPO or refers to Skillcast data privacy team with responsibility for data protection compliance.
- EU GDPR: the EU General Data Protection Regulation ((EU) 2016/679). Personal Data relating to our EU operations or EU data subjects is subject to the legal safeguards specified in the EU GDPR.



- **Explicit Consent:** consent which requires a very clear and specific statement (that is, not just action).
- **GDPR:** the term “GDPR” is used in this policy to refer to both the UK GDPR and EU GDPR. It is used where the obligations imposed by the UK GDPR and EU GDPR are practically equivalent. In any case where the context requires a distinction to be made, this policy will use UK GDPR or EU GDPR.
- **Personal Data:** any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data includes Special Categories of Personal Data and Pseudonymised Personal Data but excludes anonymous data or data that has had the identity of an individual permanently removed. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.
- **Personal Data Breach:** any act or omission that compromises the security, confidentiality, integrity or availability of Personal Data or the physical, technical, administrative or organisational safeguards that we or our third-party service providers put in place to protect it. The loss, or unauthorised access, disclosure, or acquisition, of Personal Data is a Personal Data Breach.
- **Privacy by Design:** implementing appropriate technical and organisational measures in an effective manner to ensure compliance with the GDPR.
- **Privacy Guidelines:** Skillcast privacy and GDPR related guidelines provided to assist in interpreting and implementing this Data Protection Policy and Related Policies.
- **Privacy Notices (also referred to as Fair Processing Notices) or Privacy Policies:** separate notices setting out information that may be provided to Data Subjects when Skillcast collects information about them. These notices may take the form of general privacy statements applicable to a specific group of individuals (for example, employee privacy notices or the website privacy policy) or they may be stand-alone, one-time privacy statements covering Processing related to a specific purpose.
- **Processing or Process:** any activity that involves the use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.
- **Pseudonymisation or Pseudonymised:** replacing information that directly or indirectly identifies an individual with one or more artificial identifiers or pseudonyms so that the person, to whom the data relates, cannot be identified without the use of additional information which is meant to be kept separately and secure.
- **Special Categories of Personal Data:** information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data.
- **UK GDPR:** the retained EU law version of the General Data Protection Regulation ((EU) 2016/679). Personal Data relating to our UK operations or UK data subjects is subject to the legal safeguards specified in the UK GDPR.

Special Category Data

Skillcast, as a data controller, does not collect, hold or process Criminal Convictions Data or Special Categories of Personal Data (previously known as sensitive personal data, eg information regarding an individual's health, disabilities, race or ethnic origin, or trade union membership). If you intend to collect or process Special Category Data or Criminal Convictions Data you must first discuss this with the DPO.

Personal data protection principles

We adhere to the principles relating to Processing of Personal Data set out in the GDPR which require Personal Data to be:

- a) Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency);
- b) collected only for specified, explicit and legitimate purposes (Purpose Limitation);
- c) adequate, relevant, and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation);
- d) accurate and where necessary kept up to date (Accuracy);



- e) not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation);
- f) Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction, or damage (Security, Integrity and Confidentiality);
- g) not transferred to another country without appropriate safeguards being in place (Transfer Limitation); and
- h) made available to Data Subjects and allow Data Subjects to exercise certain rights in relation to their Personal Data (Data Subject's Rights and Requests).

We are responsible for and must be able to demonstrate compliance with the data protection principles listed above (Accountability).

Lawfulness and fairness

Personal data must be Processed lawfully, fairly and in a transparent manner in relation to the Data Subject.

You may only collect, process, and share Personal Data fairly and lawfully and for specified purposes. The GDPR restricts our actions regarding Personal Data to specified lawful purposes. These restrictions are not intended to prevent Processing but ensure that we Process Personal Data fairly and without adversely affecting the Data Subject.

The GDPR allows Processing for specific purposes, some of which are set out below:

- a) the Data Subject has given his or her Consent;
- b) the Processing is necessary for the performance of a contract with the Data Subject;
- c) to meet our legal compliance obligations;
- d) to protect the Data Subject's vital interests;
- e) to pursue our legitimate interests for purposes where they are not overridden because the

Processing prejudices the interests or fundamental rights and freedoms of Data Subjects. The purposes for which we process Personal Data for legitimate interests need to be set out in applicable Privacy Notices; or You must identify and document the legal ground being relied on for each Processing activity.

Consent

A Controller must only process Personal Data based on one or more of the lawful bases set out in the GDPR, which include Consent. A Data Subject consents to Processing of their Personal Data if they indicate agreement clearly either by a statement or positive action to the Processing. Consent requires affirmative action so silence, pre-ticked boxes or inactivity are unlikely to be sufficient. If Consent is given in a document which deals with other matters, then the Consent must be kept separate from those other matters.

Data Subjects must be easily able to withdraw Consent to Processing at any time and withdrawal must be promptly honoured. Consent may need to be refreshed if you intend to Process Personal Data for a different and incompatible purpose which was not disclosed when the Data Subject first consented. Where Explicit Consent is relied on, you must issue a Privacy Notice to the Data Subject to capture Explicit Consent.

You will need to evidence Consent captured and keep records of all Consents in accordance with Related Policies and Privacy Guidelines so that Skillcast can demonstrate compliance with Consent requirements.

Transparency (notifying Data Subjects)

The GDPR requires Controllers to provide detailed, specific information to Data Subjects depending on whether the information was collected directly from Data Subjects or from elsewhere. The information must be provided through appropriate Privacy Notices which must be concise, transparent, intelligible, easily accessible, and in clear and plain language so that a Data Subject can easily understand them.



Whenever we collect Personal Data directly from Data Subjects, including for human resources or employment purposes, we must provide the Data Subject with all the information required by the GDPR including the identity of the Controller and DPO, how and why we will use, Process, disclose, protect, and retain that Personal Data through a Privacy Notice which must be presented when the Data Subject first provides the Personal Data.

When Personal Data is collected indirectly (for example, from a third party or publicly available source), we must provide the Data Subject with all the information required by the GDPR as soon as possible after collecting or receiving the data. We must also check that the Personal Data was collected by the third party in accordance with the GDPR and on a basis which contemplates our proposed Processing of that Personal Data.

If you are collecting Personal Data from Data Subjects, directly or indirectly, then you must provide Data Subjects with a Privacy Notice in accordance with our Related Policies and Privacy Guidelines.

Purpose limitation

Personal Data must be collected only for specified, explicit and legitimate purposes. It must not be further Processed in any manner incompatible with those purposes.

You cannot use Personal Data for new, different or incompatible purposes from that disclosed when it was first obtained unless you have informed the Data Subject of the new purposes and they have Consented where necessary.

Data minimisation

Personal Data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed.

You may only Process Personal Data when performing your job duties requires it. You cannot Process Personal Data for any reason unrelated to your job duties.

You may only collect Personal Data that you require for your job duties: do not collect excessive data. Ensure any Personal Data collected is adequate and relevant for the intended purposes.

You must ensure that when Personal Data is no longer needed for specified purposes, it is deleted or anonymised in accordance with Skillcast's data retention guidelines.

Accuracy

Personal Data must be accurate and, where necessary, kept up to date. It must be corrected or deleted without delay when inaccurate.

You will ensure that the Personal Data we use and hold is accurate, complete, kept up to date and relevant to the purpose for which we collected it. You must check the accuracy of any Personal Data at the point of collection and at regular intervals afterwards. You must take all reasonable steps to destroy or amend inaccurate or out-of-date Personal Data.

Storage limitation

Personal Data must not be kept in an identifiable form for longer than is necessary for the purposes for which the data is processed.

Skillcast will maintain retention policies and procedures to ensure Personal Data is deleted after a reasonable time for the purposes for which it was being held unless a law requires that data to be kept for a minimum time.

You must not keep Personal Data in a form which permits the identification of the Data Subject for longer than needed for the legitimate business purpose or purposes for which we originally collected it including for the purpose of satisfying any legal, accounting or reporting requirements.



You will take all reasonable steps to destroy or erase from our systems all Personal Data that we no longer require in accordance with all Skillcast's applicable records retention schedules and policies. This includes requiring third parties to delete that data where applicable.

You will ensure Data Subjects are informed of the period for which data is stored and how that period is determined in any applicable Privacy Notice.

Security integrity and confidentiality

Protecting Personal Data

Personal Data must be secured by appropriate technical and organisational measures against unauthorised or unlawful Processing, and against accidental loss, destruction, or damage.

We will develop, implement, and maintain safeguards appropriate to our size, scope and business, our available resources, the amount of Personal Data that we own or maintain on behalf of others and identified risks (including use of encryption and Pseudonymisation where applicable). We will regularly evaluate and test the effectiveness of those safeguards to ensure security of our Processing of Personal Data. You are responsible for protecting the Personal Data we hold. You must implement reasonable and appropriate security measures against unlawful or unauthorised Processing of Personal Data and against the accidental loss of, or damage to, Personal Data. You must exercise particular care in protecting Special Categories of Personal Data and Criminal Convictions Data from loss and unauthorised access, use or disclosure.

You must follow all procedures and technologies we put in place to maintain the security of all Personal Data from the point of collection to the point of destruction. You may only transfer Personal Data to third-party service providers who agree to comply with the required policies and procedures and who agree to put adequate measures in place, as requested.

You must maintain data security by protecting the confidentiality, integrity, and availability of the Personal Data, defined as follows:

- a) Confidentiality means that only people who have a need to know and are authorised to use the Personal Data can access it;
- b) Integrity means that Personal Data is accurate and suitable for the purpose for which it is processed; and
- c) Availability means that authorised users can access the Personal Data when they need it for authorised purposes.

You must comply with and not attempt to circumvent the administrative, physical, and technical safeguards we implement and maintain in accordance with the GDPR and relevant standards to protect Personal Data.

Reporting a Personal Data Breach

The GDPR requires Controllers to notify any Personal Data Breach to the relevant supervisory authority (in the UK this means the Information Commissioner) and, in certain instances, the Data Subject.

We have put in place procedures to deal with any suspected Personal Data Breach and will notify Data Subjects or any applicable regulator where we are legally required to do so.

If you know or suspect that a Personal Data Breach has occurred, do not attempt to investigate the matter yourself. Immediately contact the person or team designated as the key point of contact for Personal Data Breaches the DPO or a member of the Executive Management Committee. You should preserve all evidence relating to the potential Personal Data Breach.

Transfer limitation

The UK GDPR and EU GDPR both restrict data transfers to countries outside the UK and EU, respectively, to ensure that the level of data protection afforded to individuals by the UK GDPR and EU GDPR is not undermined. You transfer Personal Data originating in one country across borders when you transmit, send, view or access that data in or to a different country.

You may only transfer Personal Data outside the UK if one of the following conditions applies:



- a) the UK has issued regulations confirming that the country to which we transfer the Personal Data ensures an adequate level of protection for the Data Subject's rights and freedoms;
- b) appropriate safeguards are in place such as binding corporate rules (BCR), standard contractual clauses approved for use in the UK, an approved code of conduct or a certification mechanism, a copy of which can be obtained from the DPO;
- c) the Data Subject has provided Explicit Consent to the proposed transfer after being informed of any potential risks; or
- d) the transfer is necessary for one of the other reasons set out in the UK GDPR including the performance of a contract between us and the Data Subject, reasons of public interest, to establish, exercise or defend legal claims or to protect the vital interests of the Data Subject where the Data Subject is physically or legally incapable of giving Consent and, in some limited cases, for our legitimate interest.

You may only transfer Personal Data outside the EU if one of the following conditions applies:

- a) the EU has issued a decision confirming that the country to which we transfer the Personal Data ensures an adequate level of protection for the Data Subject's rights and freedoms;
- b) appropriate safeguards are in place such as binding corporate rules (BCR), standard contractual clauses approved for use in the EU, an approved code of conduct or a certification mechanism, a copy of which can be obtained from the DPO;
- c) the Data Subject has provided Explicit Consent to the proposed transfer after being informed of any potential risks; or
- d) the transfer is necessary for one of the other reasons set out in the EU GDPR including the performance of a contract between us and the Data Subject, reasons of public interest, to establish, exercise or defend legal claims or to protect the vital interests of the Data Subject where the Data Subject is physically or legally incapable of giving Consent and, in some limited cases, for our legitimate interest.

In respect of transfers within the Skillcast group of companies, Skillcast has entered into the standard contractual clauses referred to above.

Data Subject's rights and requests

Data Subjects have rights when it comes to how we handle their Personal Data. These include rights to:

- a) withdraw Consent to Processing at any time;
- b) receive certain information about the Controller's Processing activities;
- c) request access to their Personal Data that we hold;
- d) prevent our use of their Personal Data for direct marketing purposes;
- e) ask us to erase Personal Data if it is no longer necessary in relation to the purposes for which it was collected or processed or to rectify inaccurate data or to complete incomplete data;
- f) restrict Processing in specific circumstances;
- g) challenge Processing which has been justified based on our legitimate interests or in the public interest;
- h) request a copy of an agreement under which Personal Data is transferred outside of the UK;
- i) object to decisions based solely on Automated Processing, including profiling (ADM);
- j) prevent Processing that is likely to cause damage or distress to the Data Subject or anyone else;
- k) be notified of a Personal Data Breach which is likely to result in high risk to their rights and freedoms;
- l) make a complaint to the supervisory authority; and
- m) in limited circumstances, receive or ask for their Personal Data to be transferred to a third party in a structured, commonly used and machine-readable format.

You must verify the identity of an individual requesting data under any of the rights listed above (do not allow third parties to persuade you into disclosing Personal Data without proper authorisation).

You must immediately forward any Data Subject request you receive to your supervisor OR the DPO.

Accountability



The Controller must implement appropriate technical and organisational measures in an effective manner, to ensure compliance with data protection principles. The Controller is responsible for, and must be able to demonstrate, compliance with the data protection principles.

Skillcast must have adequate resources and controls in place to ensure and to document GDPR compliance including:

- a) appointing a suitably qualified DPO (where necessary) and an executive accountable for data privacy;
- b) implementing Privacy by Design when Processing Personal Data and completing DPIAs where Processing presents a high risk to rights and freedoms of Data Subjects;
- c) integrating data protection into internal documents including this Data Protection Policy, Related Policies, Privacy Guidelines or Privacy Notices;
- d) regularly training Skillcast Personnel on the GDPR, this Data Protection Policy, Related Policies and Privacy Guidelines and data protection matters including, for example, Data Subject's rights, Consent, legal basis, DPIA and Personal Data Breaches. Skillcast must maintain a record of training attendance by Skillcast Personnel; and
- e) regularly testing the privacy measures implemented and conducting periodic reviews and audits to assess compliance, including using results of testing to demonstrate compliance improvement effort.

Record keeping

The GDPR requires us to keep full and accurate records of all our data Processing activities. You must keep and maintain accurate corporate records reflecting our Processing including records of Data Subjects' Consents and procedures for obtaining Consents.

These records should include, at a minimum, the name and contact details of the Controller and the DPO, clear descriptions of the Personal Data types, Data Subject types, Processing activities, Processing purposes, third-party recipients of the Personal Data, Personal Data storage locations, Personal Data transfers, the Personal Data's retention period and a description of the security measures in place. To create the records, data maps should be created which should include the detail set out above together with appropriate data flows.

Training and audit

We are required to ensure all Skillcast Personnel have undergone adequate training to enable them to comply with data privacy laws. We must also regularly test our systems and processes to assess compliance.

You must undergo all mandatory data privacy related training and ensure your team undergo similar mandatory training.

You must regularly review all the systems and processes under your control to ensure they comply with this Data Protection Policy and check that adequate governance controls and resources are in place to ensure proper use and protection of Personal Data.

Privacy by Design and Data Protection Impact Assessment (DPIA)

We are required to implement Privacy by Design measures when Processing Personal Data by implementing appropriate technical and organisational measures (like Pseudonymisation) in an effective manner, to ensure compliance with data privacy principles.

You must assess what Privacy by Design measures can be implemented on all programmes, systems or processes that Process Personal Data by taking into account the following:

- the state of the art;
- the cost of implementation;
- the nature, scope, context, and purposes of Processing; and
- the risks of varying likelihood and severity for rights and freedoms of Data Subjects posed by the Processing.

Controllers must also conduct DPIAs in respect to high-risk Processing.



You should conduct a DPIA (and discuss your findings with the DPO) when implementing major system or business change programs involving the Processing of Personal Data including:

- use of new technologies (programs, systems, or processes), or changing technologies (programs, systems, or processes);
- Automated Processing including profiling and ADM;
- large-scale Processing of Special Categories of Personal Data or Criminal Convictions Data; and
- large-scale, systematic monitoring of a publicly accessible area.

A DPIA must include:

- a description of the Processing, its purposes and the Controller's legitimate interests if appropriate;
- an assessment of the necessity and proportionality of the Processing in relation to its purpose;
- an assessment of the risk to individuals; and
- the risk mitigation measures in place and demonstration of compliance.

Automated Processing (including profiling) and Automated Decision-Making

Generally, ADM is prohibited when a decision has a legal or similar significant effect on an individual unless:

- a) a Data Subject has Explicitly Consented;
- b) the Processing is authorised by law; or
- c) the Processing is necessary for the performance of or entering a contract.

If certain types of Special Categories of Personal Data or Criminal Convictions Data are being processed, then grounds (b) or (c) will not be allowed but the Special Categories of Personal Data and Criminal Convictions Data can be Processed where it is necessary (unless less intrusive means can be used) for substantial public interest like fraud prevention.

If a decision is to be based solely on Automated Processing (including profiling), then Data Subjects must be informed when you first communicate with them of their right to object. This right must be explicitly brought to their attention and presented clearly and separately from other information. Further, suitable measures must be put in place to safeguard the Data Subject's rights and freedoms and legitimate interests.

We must also inform the Data Subject of the logic involved in the decision making or profiling, the significance and envisaged consequences and give the Data Subject the right to request human intervention, express their point of view or challenge the decision.

A DPIA must be carried out before any Automated Processing (including profiling) or ADM activities are undertaken.

Direct marketing

We are subject to certain rules and privacy laws when marketing to our customers.

For example, a Data Subject's prior consent is required for electronic direct marketing (for example, by email, text, or automated calls). The limited exception for existing customers known as "soft opt-in" allows organisations to send marketing texts or emails if they have obtained contact details during a sale to that person, they are marketing similar products or services, and they gave the person an opportunity to opt out of marketing when first collecting the details and in every subsequent message. The right to object to direct marketing must be explicitly offered to the Data Subject in an intelligible manner so that it is clearly distinguishable from other information.

A Data Subject's objection to direct marketing must be promptly honoured. If a customer opts out at any time, their details should be suppressed as soon as possible. Suppression involves retaining just enough information to ensure that marketing preferences are respected in the future.

Sharing Personal Data



Generally, we are not allowed to share Personal Data with third parties unless certain safeguards and contractual arrangements have been put in place.

You may only share the Personal Data we hold with another employee, agent or representative of our group (which includes our subsidiaries and our ultimate holding company along with its subsidiaries) if the recipient has a job-related need to know the information and the transfer complies with any applicable cross-border transfer restrictions.

You may only share the Personal Data we hold with third parties, such as our service providers, if:

- a) they have a need to know the information for the purposes of providing the contracted services;
- b) sharing the Personal Data complies with the Privacy Notice provided to the Data Subject and, if required, the Data Subject's Consent has been obtained;
- c) the third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place;
- d) the transfer complies with any applicable cross-border transfer restrictions; and
- e) a fully executed written contract that contains GDPR-approved third party clauses has been obtained.

Changes to this Data Protection Policy

We keep this Data Protection Policy under regular review. This version was last updated on the date set out in the table at the head of this document.

This Data Protection Policy does not override any applicable national data privacy laws and regulations in countries where Skillcast operates.

Compliance

All members of staff are responsible for ensuring that any personal information which they hold is kept securely and not disclosed to any unauthorised third parties. The Group ensures that all personal information is accessible only to those who have a valid reason for using it. The Group has in place appropriate security measures to protect information physically and electronically.

As a matter of best practice, other agencies and individuals working with the Group and who have access to personal information, are expected to read and comply with this policy. It is expected that departments who are responsible for dealing with external bodies will take the responsibility for ensuring that such bodies sign a contract which among other things will include an agreement to abide by this policy.

The Board also confirms consent cannot be inferred from the non-response to a communication.

This policy will be updated as necessary to reflect best practice in information management, security, and control and to ensure compliance with any changes or amendments to the GDPR and other relevant legislation.

This policy applies to all staff of the Group. Any breach of this policy or of the legislation itself will be considered an offence and the companies' disciplinary procedures may be invoked.

Incident response

GDPR introduces a duty to report certain types of personal data breach to the relevant supervisory authority. The Group does this within 72 hours of becoming aware of the breach.

If the breach is likely to result in a high risk of adversely affecting stakeholders' rights and freedoms, the Group also informs those stakeholders without undue delay.