

THE JUICE ACADEMY LTD (“THE JUICE ACADEMY”) PRIVACY NOTICE

Important information about The Juice Academy:

The Juice Academy is a part of Apprentify Group Limited (Company number 11448437).

Apprentify Group Limited and its affiliates (collectively referred to as “Apprentify”, “we”, “us”) takes its data protection and privacy responsibilities seriously. This ‘Privacy Notice’ explains how we collect, use and share personal information in the course of our business activities, including:

Key principles of GDPR.

Our privacy policy embodies the following key principles; (a) Lawfulness, fairness, and transparency, (b) Purpose limitation, (c) Data minimisation, (d) Accuracy, (e) Storage limitation, (f) Integrity and confidence, (g) Accountability.

What personal information we collect and when and why we use it.

- How we share personal information within Apprentify and with our service providers, regulators and other third parties.
- Explaining more about Direct Marketing, Profiling, and Automated Decision Making.
- Transferring personal information globally.
- How we protect and store personal information.
- Legal rights available to help manage your privacy.
- How you can contact us for more support.

The Apprentify entity responsible for your personal information will be the member of Apprentify that originally collects information from or about you. This will be explained at the point at which your personal information is first collected by that Apprentify entity, for example where you or the business you work for engages us to provide a service or where we engage you to provide a service to us.

You can find out more about Apprentify at www.apprentify.com or by contacting us using the information in the contact us section.

If you no longer wish to receive any Marketing material, you can unsubscribe by emailing info@apprentify.com.

We may amend this notice from time to time to keep it up to date with legal requirements and the way we operate our business. Please regularly check these pages for the latest version of this notice.

You might find external links to third party websites on our website. This privacy notice does not apply to your use of a third party site.

WHAT PERSONAL INFORMATION WE COLLECT AND WHEN AND WHY WE USE IT

- In this section you can find out more about:
- the types of personal information we collect.
- when we collect personal information.
- how we use personal information.
- the legal basis for using personal information.

When we collect information:

We collect information about you if you:

- register with or use one of our website(s) or online services;
- purchase one of our services;
- make an information request;
- work with us as a business partner; or
- you are identified as a potential customer or business partner,
- collectively (“you”).

Processing of your personal data

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

- We are registered with the ICO under the Data Protection Register, our registration number is: ZA242325.
- Personal Data: You may voluntarily decide to provide us with personal information about you by filling in forms on our site www.Apprentify.com(our “Site”) or by corresponding with us by telephone, e-mail or otherwise.
- This includes information you provide when you register to use our site, subscribe to our service, participate in discussion boards or other social media functions on our Site, enter a competition, promotion or survey, and when you report a problem with our Site. You provide us with this information in order to receive the apprenticeship recruitment and employment opportunity matching services we provide, and to receive information about new opportunities we are working on that may be of interest to you. The information you give us may include your name, date of birth, address, e-mail address and phone number, postcode, academic results, curriculum vitae, citizenship, right to work or visa status, personal description and photographs, video interviews, personality and psychometric test answers and results, as well as your previous employment history. We use this information to assess your eligibility for the apprenticeship opportunities, to match you to suitable opportunities and to communicate with you.
- If you provide us with your email address and / or phone number we may contact you by email, phone or SMS for these services. We may also use this information to send you content and recommendations based on your interests and on opportunities that may be of interest to you. You have the ability to amend and delete this information from your profile on this Site. We will inform you if we change the information we collect for these purposes or change the sub-processors we use as part of providing this service to you.

We may share your information with other members of the Apprentify Group Limited

Personal information we collect and use if you use our websites or online services:

On our website, personal information (such as your name, address, telephone number, or email address) is collected when you voluntarily submit it through a website form, such as during a request for information about our services. Other information that may also constitute personal information (such as your browser type, operating system, IP address, domain name, number of times you visited the website, dates you visited the website, and the amount of time you spent viewing the website) may be collected via cookies and other tracking technologies (such as transparent GIF files). Aggregate Information (such as how many times visitors log onto the website) may also be collected.

The business uses a 3rd party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. We use the information to report on visitor numbers, and to make improvements to our service. Information is only collected if visitors opt in, restrictions are in place to protect this data from becoming identifiable.

Personal information we collect and use if you are identified as a potential customer or business partner

We collect information directly, from other members of the Apprentify group, and from other third-party lead providers about organizations who might like to hear from us or receive our products and services. In those circumstances, we may collect basic identification and contact information (such as your name, address, telephone number, and email address) to fulfill your order, provide our services, and manage your account in order to market our goods and services to you. We will only do so in accordance with your preferences and/or as described in this privacy notice.

The legal basis for using your personal information

We will only collect, use, and share your personal information where we are satisfied that we have an appropriate legal basis to do this. This may be because:

- You have provided your consent to us using the personal information, for example, in relation to our electronic direct marketing activities.
- Our use of your personal information is in our legitimate interest as a commercial organization (for example, where we look to market our services to potential business customers or in order to make improvements to our products and services) – in these cases, we will look after your information at all times in a way that is proportionate and respects your privacy rights, and you have a right to object to processing as explained in the Legal Rights section below.
- Our use of your personal information is necessary to perform a contract or take steps to enter into a contract with you, for example, your basic contact information and billing information required to make/take payments.

- Our use of your personal information is necessary to comply with a relevant legal or regulatory obligation that we have, for example, where we are required to disclose personal information to a court or tax authority.

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SHARING PERSONAL INFORMATION WITHIN APPRENTIFY, WITH OUR SERVICE PROVIDERS, OUR REGULATORS

In this section, you can find out more about how we share personal information:

- within Apprentify
- with third parties that help us provide our products and services
- our regulators

We share your information in the manner and for the purposes described below:

- within Apprentify, where such disclosure is necessary to provide you with our services, offer our products and services, or to manage our business. Click here for a list of Apprentify affiliates.
- with third parties who help manage our business and deliver services. These third parties have agreed to confidentiality restrictions and use any personal information we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us. These include IT service providers who help manage our IT and back-office systems.
- with credit reference agencies and organizations working to prevent fraud in financial services.
- with our regulators and relevant supervisory authorities to comply with all applicable laws, regulations, and rules, and requests of law enforcement, regulatory, and other governmental agencies.
- we may share, in aggregate, statistical form, non-personal information regarding the visitors to our website, traffic patterns, and website usage with our business partners, affiliates, or advertisers.
- If, in the future, we sell or transfer some or all of our business or assets to a third party, we may disclose information to a potential or actual third-party purchaser of our business or assets.

EXPLAINING MORE ABOUT DIRECT MARKETING, PROFILING AND AUTOMATED DECISION MAKING

In this section, you can find out more about: how we use personal information to keep you up to date with our products and services. how you can manage your marketing preferences when and how we undertake profiling and analytics when and how we carry out automated decision making.

How we use personal information to keep you up to date with our products and services

We may use personal information to let you know about Apprentify Group Limited products and services that we believe will be of interest to you. We may contact you by email, post, or telephone or through other communication channels that we think you may find helpful.

In all cases, we will respect your preferences for how you would like us to manage marketing activity with you.

How you can manage your marketing preferences

To protect privacy rights and to ensure you have control over how we manage marketing with you:

We will take steps to limit direct marketing to a reasonable and proportionate level and only send you communications which we believe may be of interest or relevance to you; you can ask us to stop direct marketing at any time – you can ask us to stop sending email marketing, by following the ‘unsubscribe’ link you will find on all the email marketing messages we send you. Alternatively, you can contact us via the link provided at the top of this document. Please specify whether you would like us to stop all forms of marketing or just a particular type (e.g. email); and you can change the way your browser manages cookies, which may be used to deliver online advertising, by following the settings on your browser as explained below. We recommend you routinely review the preference settings within your Apprentify Group Limited account.

When and how we undertake profiling and analytics

Please refer to our cookie policy.

When and how we carry out automated decision making

Credit rating checks Employee performance analysis

HOW WE PROTECT AND STORE YOUR INFORMATION

Security

We at Apprentify Group Limited ("Apprentify") have implemented and maintained appropriate technical and organizational security measures, policies, and procedures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to such information appropriate to the nature of the information concerned. Measures we take include placing confidentiality requirements on our staff members and service providers; destroying or permanently anonymizing personal information if it is no longer needed for the purposes for which it was collected.

Storing your personal information

We will store your personal information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this notice. In some circumstances, we may store your personal information for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, accounting requirements. In specific circumstances, we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints

or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

WHERE WE PROTECT AND STORE YOUR INFORMATION

Apprentify uses a Customer Relationship Management (CRM) system to manage our interactions with our customers, suppliers, and partners. This system enables us to keep track of the information that we collect about you and to use this information to provide you with the best possible service.

When you interact with Apprentify, we may collect personal information about you, such as your name, email address, phone number, and job title. We will only use this information for the purposes of providing you with our services and improving our customer relationships. We will not share your personal data with any third party without your explicit consent, except in the limited circumstances outlined in our privacy policy.

We take the security of your personal data seriously and have put in place appropriate measures to prevent unauthorized access or disclosure of your personal information. We use encryption technology to protect your data, and we restrict access to your personal information to only those employees who need it to perform their job duties.

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected, or as required by law. If you would like to know more about how we handle your personal data or if you would like to exercise your rights under applicable data protection laws, please see our full privacy policy or contact us using the details provided.

LEGAL RIGHTS AVAILABLE TO HELP MANAGE YOUR PRIVACY

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information. The sections below enable you to learn more about each right you may have:

To access personal information To rectify/erase personal information To restrict the processing of your personal information To transfer your personal information To object to the processing of personal information To object to how we use your personal information for direct marketing purposes To obtain a copy of personal information safeguards used for transfers outside your jurisdiction To lodge a complaint with your local supervisory authority We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information requested to you. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

Subject to legal and other permissible considerations, we will make every reasonable effort to honor any request promptly or inform you if we require further information in order to fulfill your request.

We may not always be able to fully address your request, for example, if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

Right to access personal information

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of;

the source of your personal information; the purposes, legal basis, and methods of processing; the data controller's identity; and the entities or categories of entities to whom your personal information may be transferred. Right to rectify or erase personal information
You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

it is no longer needed for the purposes for which it was collected; or you have withdrawn your consent (where the data processing was based on consent); or following a successful right to object; or it has been processed unlawfully; or to comply with a legal obligation to which Apprentify is subject. We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:
for compliance with a legal obligation; or for the establishment, exercise, or defense of legal claims;

Right to restrict the processing of your personal information

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending. We can continue to use your personal information following a request for restriction, where:
- we have your consent; or to establish, exercise or defend legal claims; or to protect the rights of another natural or legal person.

Right to transfer your personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and the processing is carried out by automated means.

Right to object to the processing of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

Right to object to how we use your personal information for direct marketing purposes

You can request that we change the manner in which we contact you for marketing purposes.

You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

You can ask to obtain a copy of, or reference to, the safeguards in the event that your personal information is transferred outside of the European Union.

We reserve the right to redact any data transfer agreements to protect our commercial interests.

Right to lodge a complaint with your local supervisory authority

You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your personal information.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

CONTACT US

The primary point of contact for all issues arising from this privacy notice, is our Data Protection Officer. The Data Protection Officer can be contacted via: info@apprentify.com; or The Data Protection Officer, Apprentify Group Limited, Alderley Park, Glasshouse SK10 4TG

If you have any questions or concerns regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us. We will investigate and attempt to resolve complaints and disputes and will make every reasonable effort to honour your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by data protection laws.

Additional Privacy Notices

We may undertake certain processing of personal information which are subject to additional Privacy Notices and we shall bring these to your attention where they engage.

Notice of changes

Apprentify may change or update this Privacy Notice at any time.

Should we change our approach to data protection, you will be informed of these changes or made aware that we have updated the Privacy Notice so that you know which information we process and how we use this information.

This Privacy Notice was last updated and reviewed on 24th April 2023 – Version 1.0.