METRIC SEARCH LIMITED WEBSITE PRIVACY POLICY

INTRODUCTION

Welcome to Metric Search Limited's privacy policy.

Metric Search respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

- 1. <u>Important Information and Who We Are</u>
- 2. The Data We Collect About You
- 3. How Is Your Personal Data Collected
- 4. How We Use Your Personal Data
- 5. **Disclosures of Your Personal Data**
- 6. **International Transfers**
- 7. **Data Security**
- 8. **Data Retention**
- 9. Your Legal Rights
- 10. Glossary
- 1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy policy

This privacy policy aims to give you information on how Metric Search collects and processes your personal data through your use of this website, including any data you may provide through this website

when you register for our services.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

Controller

Metric Search Limited is the controller and responsible for your personal data (collectively referred to as Metric Search, we, us or our in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights

please contact us using the details set out below.

Contact details

Our full details are:

Full name of legal entity: Metric Search Limited. We are registered in England and Wales under number 12993157 and we have our registered office at 55 Maid Marian Way, 3rd Floor, Nottingham, England, NG1 6GE. Our VAT number is 484521872.

Email address: info@metric-search.com

Postal address: 55 Maid Marian Way, 3rd Floor, Nottingham, England, NG1 6GE

Telephone number :020 4540 6091

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Data protection law requires Metric Search, as controller for your data:

to process your data in a lawful, fair and transparent way;

• to only collect your data for explicit and legitimate purposes;

- to only collect data that is relevant, and limited to the purpose(s) we have told you about;
- to ensure that your data is accurate and up to date;
- to ensure that your data is only kept as long as necessary for the purpose(s) we have told you about;
- to ensure that appropriate security measures are used to protect your data.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 13th of February 2025 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. We may ask you to confirm updates to your personal data from time to time but please keep us informed if your personal data changes during your relationship with us in the meantime. Please inform us of any changes in your data at the following email address: info@metric-search.com.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We and organisations connected with have a social media presence for the purpose of engaging with you.

If you enable such connections or choose to communicate your personal data to us via third-party websites or social media, please remember that we do not control these third-party websites and are not responsible for their privacy statements. When you leave our website or interact with us on social media, we encourage you to read the privacy policy of every website of forum that you visit or use.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, last name, title, date of birth.
- Contact Data includes postal address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Usage Data includes information about how you use our website and services (including number
 of website visits, time spent on the relevant page and items that were visited throughout our
 website).
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.
- Applicant Data includes your education and employment history and any other information you
 provide in connection with your application to work for Metric Search, and any references we
 receive from your former employer or other relevant organisation. (If you are a candidate for a
 role with another employer using Metric Search's recruitment services, please see our candidate
 privacy notice).

We refer to the above categories of data in the tables in section 4 below.

Where you represent a business, much of the data we collect is likely to relate to that business, rather than you personally (for example, if that business is a client of Metric Search, we are likely to collect Financial and Transaction Data relating to that business, rather than you). However, this privacy policy applies to the extent that we collect any personal data about you in connection with our relationship with that business – including, for example, Contact Data (as your business email address may contain your personal data). If you have any questions about what personal data we collect about you, please contact us using our contact details in section 1 above.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms
 or by corresponding with us by post, phone, email or otherwise. This includes personal data you
 provide when you:
 - procure recruitment services from us;
 - request marketing to be sent to you;
 - apply for a job at Metric Search;
 - · give us some feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we may
 automatically collect Technical Data about your equipment, browsing actions and patterns. We
 collect this personal data by using cookies, and other similar technologies. Please see our cookie
 policy [LINK] for further details.

Third parties.

- If you are applying for a role with Metric, we may receive Applicant Data from your former employer or other relevant organisation as part of a reference.
- We also use Google Analytics for website analytics purposes, including website traffic and web dashboard details and through this we receive Technical and Usage Data.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

See our glossary to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please <u>contact us</u> if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information		
Clients/prospective clients					
To respond to your enquiry	(a) Identity (b) Contact	Necessary for our legitimate interests (to offer our services to prospective clients and understand their needs)			
To register you as a new client	(a) Identity (b) Contact	Performance of a contract with you	We use Bullhorn, who provide our case management system. Bullhorn are based in the United States.		
To deliver our services including: (a) Liaising with you in connection with the services (b) Manage payments (c) Collect and recover money owed to us	(a) Identity(b) Contact(c) Financial(d) Transaction(e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)	We use Bill.com LLC, a payment provider based in the United States.		
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you for feedback on our services	(a) Identity(b) Contact(c) Profile(d) Marketing and Communications	 (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our services) 			

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information	
To use data analytics to improve our services, marketing, client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of clients for our services, to develop our business and to inform our marketing strategy)	We use Google Analytics for website analytics purposes, based in the United States.	
To deliver marketing communications and relevant advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity(b) Contact(c) Profile(d) Usage(e) Marketing and Communications	Necessary for our legitimate interests (to send marketing messages to our clients, study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)	We use Google Analytics for website analytics purposes, based in the United States. We use HubSpot Inc. for electronic marketing services, based in the United States.	
Website users To administer and protect our business and (a) Identity (a) Necessary for our legitimate interests (for running We use Google Analytics for website				
this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(b) Contact (c) Technical	our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation	analytics purposes, based in the United States.	
To deliver relevant website content to you	(a) Usage (b) Technical	Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)	We use Google Analytics for website analytics purposes, based in the United States.	

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information	
To use data analytics to improve our website Job applicants	(a) Technical (b) Usage	Necessary for our legitimate interests (to keep our website updated and relevant)	We use Google Analytics for website analytics purposes, based in the United States.	
To: (a) Assess your skills, qualifications, and suitability for the role. (b) Communicate with you about the recruitment process. (c) Keep records related to our hiring processes.	(a) Identity (b) Contact (c) Applicant	 (a) Necessary for our legitimate interests (to decide whether to appoint you to the role, since it would be beneficial to our business to appoint someone to that role) (b) Performance of a contract (for us to decide whether to enter into a contract of employment with you) 		
<u>Suppliers</u>				
To purchase goods or services from you, including: (a) To make initial enquiries with you and liaise with you thereafter (b) To understand your offering of goods/services	(a) Identity(b) Contact(c) Any additional information shared with us in connection with your supply of	 (a) Performance of a contract (b) Necessary for our legitimate interests (to understand supplier goods and services offerings and engage suppliers as we consider appropriate for our business) 		

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	Third party processing and international transfer information
(c) To pay you and to otherwise administer the contract we have with you	goods or services to Metric Search (including any publicly available information)		

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can manage your marketing preferences or opt out of marketing at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside of Metric Search for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by <u>contacting us</u> at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us relating to the services that we are providing to you.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [LINK.]

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible

with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We share your personal data within the Metric group. This may involve transferring your data outside the UK (specifically, to Metric Search Inc. in the United States).

Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please <u>contact us</u> if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

8. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for six years after they cease being clients.

In some circumstances you can ask us to delete your data: see below for further information.

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

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- · Request correction of your personal data.
- · Request erasure of your personal data.
- Object to processing of your personal data.

- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is

necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the Metric group acting as joint controllers and who are based in the United States.

External Third Parties

- Service providers acting as processors such as:
 - o Bullhorn, based in the United States, who provide case management systems;
 - Google Analytics, based in the United States, who provide website analytics services;
 - o Bill.com LLC, based in the United States, who provide payment services;
 - HubSpot Inc, based in in the United States, who provide electronic marketing services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data

where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.