

# Privacy Policy

*Last Updated: 12/18/2019*

## 1. General

Development Guild/DDI, Inc. (“Development Guild”, “we”, “us” or “our”) respect your privacy and are committed to processing your personal data in accordance with the law. This Privacy Statement (hereinafter the “Statement” or “Privacy Statement”) sets out how we use, store, disclose and process personal data that we obtain through or in connection with the use of our website ([www.developmentguild.com](http://www.developmentguild.com)) (“Website”), or from candidates, clients and referees as part of the recruitment services we provide (“Services”), or when you otherwise contact us and/or we collect your personal data.

For the purposes of the European General Data Protection Regulation 2016/679 (the “GDPR”), Development Guild is the “data controller” of, and responsible for, your personal data collected in accordance with this Privacy Statement.

If you have any inquiries or complaints regarding our Privacy Statement, please contact us using the details below:

By email: [info@developmentguild.com](mailto:info@developmentguild.com)

By post: Development Guild DDI, Inc., 233 Harvard St., Suite 107, Brookline, MA 02446

By telephone: (617) 277-2112

## 2. What is “personal data”?

The term “personal data” as used in this Statement shall mean any information (including “personal data” as that term may be defined) that actually enables, or is capable of enabling us to identify you, directly or indirectly, by reference to an identifier such as your name, identification number, location data, online identifier, veteran status or one or more factors specific to you. From time to time, we also process special category data (“Special Category Data”) which is more sensitive and requires more protection. Special Category Data includes (amongst other things) information about an individual’s racial or ethnic origin, disability status and health. We do not collect Special Category Data ourselves. When you submit an application to Development Guild, we may offer you the opportunity to fill out an optional diversity questionnaire. These questionnaires are provided by a selected third party which we use to collect and report on diversity data on an anonymous basis. We are provided Special Category Data by our partner on an aggregated basis, and never in a form which would allow us to associate such data with any one person individually.

## 3. Data processing in the United States

If you are visiting our Website and/or using our Services or otherwise providing personal data to us from outside the U.S., be aware that your personal data will be transferred to, stored, and processed by us in the U.S. where our servers are located, and our central database is operated.

## 4. Personal data we may collect from you

We may collect and process the following information about you:

- **Information you provide to us** - You may provide us with your personal data in many ways, for example by filling in forms, requesting information, submitting applications for roles with our clients, in connection with the provision of our Services to you or your employer, providing references for current and former employees, subscribing to materials, taking surveys or corresponding with us by post, phone, email or otherwise. Such personal data include: name, address, email address, telephone number, resume and cover letter, professional history, academic history, answers to questions about suitability for a position, interview notes related to job fitness and experience, professional references, professional and personal competencies, extracurricular activities and your correspondence with us.
- **Information we collect about you** - When you visit our Website we may collect information about your computer or device, including your IP address, information about your visit, your browsing history, and how you use our Website . This information may be combined with other information you provide to us, as described above. These types of data are collected by cookies and similar technologies.

If you are visiting us from the EU, we will only use “strictly necessary cookies”. These are cookies that are required for the operation of our Website and therefore cannot be refused. They can, however, be deleted or blocked using your browser settings.

- **Information we receive from other sources** – We may also receive personal data about you from current and previous employers as part of our referencing process, and from prospective employers (our clients) when you submit an application for their consideration and attend interviews for roles with them. Prospective employers will provide us with decision outcomes and feedback about your performance during the recruitment process.

## 5. Purposes for which we process personal data

We will only process personal data in accordance with applicable law.

We will process your personal data for the following purposes as is necessary for the performance of a contract between you and us, or to answer questions or take steps at your request prior to entering into a contract:

- To administer or otherwise carry out our obligations in relation to any agreement to which we are a party;
- To provide your application to our clients so that you may apply for positions;
- To create and manage our customer accounts;
- To provide our Services;
- To notify you about changes to our Services;
- To respond to queries or requests and to provide support; and
- To provide customer relationship management.

We will process your personal data for the following purposes as is reasonably necessary in for certain legitimate interests (including our legitimate business interests), or where you have given your informed consent to such processing if required by applicable law (such consent may be withdrawn at any time):

- To allow you to participate in surveys;
- To send you personalized marketing communications, in order to keep you informed of our Services, which we consider may be of interest to you;
- To assess your qualifications with respect to available positions with our clients or our firm, to identify positions for which you may be eligible and to provide you with information of roles that we feel may be suitable for you;
- To review references and facilitate background screening;
- To contact and correspond with you regarding job applications and to contact you if your profile and preferences match a vacant position;
- To comply with applicable law, for example, in response to a request from a court or regulatory body, where such request is made in accordance with the law;
- To resolve any disputes, if you lawfully exercise your rights or if you wish to dispute any part of our Services;
- As part of our efforts to keep our Website safe and secure;
- To administer our Website and for internal business administration and operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- To create Services that may meet your needs; and
- To develop and improve our Services, for example, by reviewing visits to our Website and its various subpages.

Subject to applicable laws, we may process your personal data in order to protect your vital interests or the vital interests of another person

## **6. How long do we store your personal data?**

We will store your personal data, in a form that permits us to identify you, for no longer than is necessary for the purpose for which the personal data is processed. We store your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements and rights, or if it is not technically and reasonably feasible to remove it. Otherwise, we will seek to delete your personal data within a reasonable timeframe upon request.

## **7. Do not track signals**

We do not respond to web browser “do not track” signals. As such, your navigation of our Website may be tracked as part of the gathering of quantitative user information. If you arrive at our Website by way of a link from a third party site that does respond to “do not track” requests, the recognition of any “do not track” request you have initiated will end as soon as you reach our Website.

## **8. How do we share your personal data?**

We will not sell, hire out, disclose, transfer or pass on your personal data to third parties, except in the situations provided for in this Statement or unless you provide prior consent. We may share personal data in the following ways:

- Our service providers, who are bound by law and contract to protect your personal data and only use your personal data in accordance with our instructions.
- Our analytics and search engine providers that assist us in the improvement and optimisation of our Website. Your personal data is shared in a form that does not identify you.
- With our clients, so that they may consider you for the position that you have applied for.
- With your referees, so that they may provide references to support your application.
- With another legal entity, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, financing, sale, merger, reorganization, change of legal form, dissolution or similar event. In the case of a merger or sale, your personal data will be permanently transferred to a successor company. 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 Statement.
- Where needed to enforce our rights, protect our property or protect the rights, or safety of Development Guild and others, or to support external auditing, compliance and corporate governance functions.
- Public authorities where we are required by law to do so.
- If required, in order to receive legal advice.

## **9. International transfers of personal data**

Where personal data relating to individuals based in the European Economic Area (“EEA”) is shared with a third party located in a non-EEA country that has not received an adequacy decision by the European Commission, we rely upon appropriate safeguards, such as the European Commission-approved Standard Contractual Clauses and EU-U.S. Privacy Shield Framework, to transfer the personal data. Please contact [info@developmentguild.com](mailto:info@developmentguild.com) for a copy of the safeguards which we have put in place to protect your personal data and privacy rights in these circumstances.

## **10. Right to withdraw consent to marketing and job vacancy communications**

You may opt-out of receiving general communications from us. Such communications include newsletters and information about vacant job roles with our clients which we believe may be relevant to your skill set, but only where you have given your prior consent in each case. You may opt-out of receiving such communications by following the opt-out instructions included in each email communication.

## **11. Changing personal data**

You have the right to access, correct and request removal of your personal data by e-mailing us at [info@developmentguild.com](mailto:info@developmentguild.com).

## 12. European privacy rights

In certain circumstances, you may have the following rights in relation to your personal data:

- **Request access to your personal data.** You may have the right to request access to any personal data we hold about you as well as related data, including the purposes for processing the personal data, the recipients or categories of recipients with whom the personal data has been shared, where possible, the period for which the personal data will be stored, the source of the personal data, and the existence of any automated decision making
- **Request correction of your personal data.** You may have the right to obtain without undue delay the rectification of any inaccurate personal data we hold about you.
- **Request erasure of your personal data.** You may have the right to request that personal data held about you is deleted.
- **Request restriction of processing your personal data.** You may have the right to prevent or restrict processing of your personal data.
- **Request transfer of your personal data.** You may have the right to request transfer of your personal data directly to a third party where this is technically feasible.
- **Right to object.** You may have the right to object to the processing of your personal data when you have legitimate reasons to do so.
- **Right to withdraw consent.** Where processing is based on consent, you may have the right to withdraw such consent.

We aim to respond to requests made by you within one month, but may extend that period by two further months where necessary.

Where you believe that we have not complied with our obligation under this Privacy Statement or European data protection law, you have the right to make a complaint to an EU Supervisory Authority, such as the UK's Information Commissioner's Office.

## 13. Exercising your rights

To exercise the above-mentioned rights, please send an e-mail with an enclosed copy of the frontside of your identity card to [info@developmentguild.com](mailto:info@developmentguild.com). We reserve the right to request the provision of additional information necessary to confirm the identity of the enquirer.

## 14. Cookies

Like most businesses, we employ "cookies" or similar technologies on our Website.

Cookies are small files containing a string of characters which we may store on your computer or mobile device when you visit our Website. When you visit our Website, the cookies allow

us to recognize your browser. Cookies may store your preferences and other information but cannot read data off your hard disk or read cookie files created by other sites.

You can change your browser settings to refuse or restrict cookies, and you may delete them after they have been placed on your device at any time. If you block or delete our cookies, some areas of our Website that you access may take more time to work, or may not function properly.

If you are visiting our Website from the EU, we will only store “strictly necessary cookies” on your device. These are cookies that are required for the operation of our Website and therefore cannot be refused.

#### **15. Amendments to this Privacy Statement**

We may amend this Statement at any time. Any changes we may make will be posted on this page, so please check back frequently. The most recent version of this Statement is reflected by the version date located at the top of this Statement

#### **16. Links from this Privacy Statement**

The Website may, from time to time, contain links to and from the websites of our clients, partner networks, advertisers, affiliates and other third parties. If you follow a link to any of these websites, please note that these websites may have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.