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Privacy Notice

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1. YOUR PRIVACY IS IMPORTANT TO US

Aspire Digital is committed to respecting the privacy of all individuals. This privacy notice explains our information practices and the choices you have about the way your personal information (PI) is collected, used, and protected. Any questions or concerns can be directed to the email address listed in Section 2.

This notice applies to Aspire Digital and for all purposes discussed herein (where Aspire Digital is the data Controller).

During engagement with our EU B2B Clients, Aspire Digital may process EU Personal Data controlled by our EU Client. In these situations, Aspire Digital is not the Personal Data Controller. The relevant B2B EU Client is the Personal Data Controller and Aspire Digital is the Personal Data Processor. Aspire Digital maintains appropriate organizational and technical safeguards in line with regulatory and our Client's (Controller) requirements. If you have any questions or objections relating to how your personal data has been processed, please reach out to the relevant Controller, not Aspire Digital.

2. CONTACT DETAILS

Communications, questions, or concerns about this privacy notice should be addressed to Aspire Digital's Data Protection Officer: please visit the following website <https://prighter.com/q/16335313313>.


You have the right to lodge a complaint with your local data protection authority if you have concerns about how we are processing your personal information. However, if you feel any of your rights related to the collection or use of your personal data have been violated, we ask that you please contact us using the contact information provided. We will investigate and attempt to resolve reasonable complaints and disputes. Individuals located in the European Union have the choice to contact our EU Representative directly at: please visit the following website <https://prighter.com/q/16335313313>.

3. DEFINITIONS

The following definitions apply to terms used throughout this notice:

3.1. Personal Information (PI)

Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

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3.2. Controller:

The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

3.3. Processor:

A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

4. WHAT DATA DO WE PROCESS, HOW DO WE COLLECT IT, AND WHY DO WE NEED IT?

The type of data we process, how we collect it, and our uses for it vary depending on your relationship to our company.


This privacy notice is relevant to you if you are...

- **Employee & Consultant Candidates:** Seeking full-time or contract employment opportunities with Aspire Digital (Employee & Consultant Candidates).
- **B2B Relations:** Collaborating with Aspire Digital as a current or prospective customer, business partner, or vendor (B2B Relations).
- **Website Contact Forms:** Submitting “contact us” forms through our websites

The sections below identify, among other things, different categories of personal data processed for various purposes. Those categories refer to the following:

4.1. Employee & Consultant Candidates:

Purpose for Processing:	Hiring & Employment	
	General PI (Categories)	Special/Sensitive PI (Categories)
	Career/Professional, Demographic, General Identifiers, Images,	Criminal, Financial Account Identifiers, Government Identifiers
Legal Basis:	Legitimate Interest, Legal Obligation (Employment, Social Security or Social Protection Law), Performance of Contract	
Data Sources:	We receive some personal data from you, Criminal Information provided by a Third Party.	

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Third Party Recipients	Bambee HR, Paysquare Payroll and Capella Consultants
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4.2. B2B Relations


Purpose for Processing:	Business Opportunities & Transactions	
General PI (Categories)		Special/Sensitive PI (Categories)
General Identifiers		Government Identifiers
Legal Basis:	Legitimate Interest	
Data Sources:	We receive some personal & business information from you	
Third Party Recipients	Bambee HR, Paysquare Payroll and Capella Finance Consultants, Auditors	

4.3. Website Contact Forms

Purpose for Processing:	Contact Us	
General PI (Categories)		Special/Sensitive PI (Categories)
Communications Received		None
Legal Basis:	Consent	
Data Sources:	Website	
Third Party Recipients	Not Applicable	

5. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

When collecting personal information or sharing it with third parties, data may transfer international borders. That includes information originating from the European Economic Area (EEA) and transferring to third countries outside of that region. Where EU personal data is concerned, Aspire Digital utilizes standard data protection clauses (GDPR 46(2)(c)), other applicable safeguards and laws for the protection of your personal data. Aspire Digital takes steps to ensure the protection of this information by implementing appropriate safeguards relative to the risk and sensitivity of the information processed.

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If you have questions regarding the safeguards used to protect your data when it is transferred to countries outside of the EU, please contact us using the contact information at the top of this notice. This may take the form of a copy or a reference to where such information is available

6. DATA RETENTION

Aspire Digital will retain PI only for as long as is necessary for the purpose(s) for which it was collected and in accordance with any applicable consent given in relation to such PI and any applicable laws.

Data will be removed upon request by a data subject (when applicable), or the data is no longer needed for the purpose(s) it was collected for.


7. INDIVIDUAL RIGHTS

Individuals have the following rights in relation to their PI*. If you wish to exercise any of your rights, please contact us at [\[re\]](#). Requests are typically addressed within 30 days. Depending on the nature of the request, additional time may be required. Aspire Digital will not discriminate against individuals for exercising their rights under applicable data privacy laws.

Right to be Informed	This privacy notice provides the awareness you are entitled to.
Right of Access	The right to view what personal data is processed and/or request a copy of this data.
Right to Rectification	The right to have personal data rectified if it is inaccurate or out of date.
Right to Erasure	The right to have personal data deleted.
Right to Restrict Processing	The right to limit the way we use your personal data.
Right to Data Portability	The right to have PI transferred to oneself or to another controller, in a machine-readable electronic format.
Right to Object	The right to request that Aspire Digital stop processing personal data, where processing is intended for direct marketing, or the legal basis is 'public task' or 'legitimate interest'.
Right in Relation to Automated Decision Making	The right to object to a decision based on automated processing. Where applicable, a manual review of information will be conducted to reach a decision.
'Do Not Sell My Data'	Right to request that Aspire Digital does not "sell" an individual's personal data.
Right to Withdraw Consent	The right to withdraw previously given consent for processing PI.

*Not all rights are absolute. Legal basis for processing, the requirement of disproportionate effort, legal obligations, and other factors may impact the applicability of certain rights.

Absent statutory or contractual requirements, data subjects may refuse processing of certain PI. If that occurs, the consequence of such a refusal would likely compromise Aspire Digital's ability to deliver the purpose or function for which that PI was initially intended.

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8. THIRD PARTIES INVOLVED IN PROCESSING PERSONAL INFORMATION

Aspire Digital may share your PI with third parties that process information in connection with the purposes described in this notice. Any such third parties receiving PI are bound to confidentiality and agree to handle all personal data in accordance with applicable laws. Additionally, Aspire Digital confirms that third parties involved in the processing of PI maintain appropriate technical and organizational measures for safeguarding the data relative to its risk.

9. DATA SECURITY

Aspire Digital maintains a high standard for information security, particularly in relation to PI. Computer equipment, networks, systems, data, and documentation are maintained to a high standard, and access to data and equipment is at all times restricted to appropriate staff. Aspire Digital's information security program framework is designed to ensure that holistic and effective security practices are maintained to protect PI that Aspire Digital collects and processes.

10. AUTOMATED DECISION MAKING

Aspire Digital does not use your personal information to make decisions that have legal or similarly significant impacts upon you, without human intervention.

11. MERGER

If Aspire Digital should ever file for bankruptcy or be acquired by a third party, merge with a third party, sell all or part of our assets, or otherwise transfer substantially all our relevant assets to a third party, Aspire Digital is entitled to share the PI to potential and subsequent business and merger partners.

12. PRIVACY NOTICE CHANGES

This privacy notice will be reviewed at least annually and updated as needed. For instance, this privacy notice may need to change as new legislation is introduced or as it is amended. This privacy notice was last updated (07/07/2022)

REVISION HISTORY

Version Number	Effective Date	Author	Change(s)
1.0	07/07/2022	Aspire Digital	Aspire Digital starting point draft