



Privacy and Cookie Policy

Version 2.1 - April 2020

1 About this Privacy and Cookie Policy:

Collective IQ Group Ltd. (doing business as, and hereafter known as “Arbolus”) is a company registered in England & Wales (company number 10919514). Arbolus, together with members of our group, “us”, “we” or “our”) are committed to safeguarding the privacy of third parties with whom we interact, including our Clients, our Expert and third parties who visit any of our websites.

This Privacy and Cookie Policy sets out how we collect, and process your personal information gathered from any of our websites and through the other channels. If you provide your information to us either via this website, in person, over the phone or by email (or by other means of electronic communication), you agree to the processing set out in this Privacy and Cookie Policy.

We may change or update this Privacy and Cookie Policy from time to time without notice and any such changes will take effect from the time the revised version is available on this website. We therefore request you periodically to review this agreement to ensure your understanding of and agreement with the latest requirements.

2 Information we may collect about you:

2.1 Types of data collected

You agree that Collective IQ Group Ltd (“Arbolus”) may collect, retain, and verify information about you. Specifically, types of data may include:

- Identity Data, including first name, maiden name, last name, username or similar identifier, title, and gender.
- Contact Data, including your address(es), email address(es) and telephone number(s).
- Financial Data (if we pay you anything), including bank account details.
- Transaction Data, including interactions you may have had with us.
- Technical Data, including internet protocol (IP) address, 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 any of our websites.
- Profile Data, including your CV, professional background and career history.
- Usage Data, including information about how you use any of our websites, products and services.
- Marketing and Communications Data, including your preferences in receiving marketing from us and third parties and your communication preferences.

We do not intend to collect the following special categories of personal data about you: race / ethnicity, religious / philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic biometric data.

2.2 Sources of data

We generally collect information from the following sources:

- a) Our correspondence (by email, telephone, or other electronic means);
- b) Information you provide to us (for example during the registration process including bank details if you are an Expert);
- c) Your transactions (transactions carried out through this website and in the fulfilment of services we provide);
- d) Website and communication usage (details of your visits to any of our websites and information collected through cookies and other tracking technologies. Such information may include but is not limited to your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data.); and

- e) Publicly available Data / Data you choose to make public (We may collect Personal Data you manifestly choose to make public including via social media or networking sites such as LinkedIn, or public data from sources such as press releases found through search engines. Such information may include your name, academic and professional background and employment history, including the identities of your current and former employers and job titles/positions.).

3 How we use your personal information:

We may use your personal information in the following ways. In each case, we justify why we use your data in these ways as required under EU data protection laws.

In General:

- a) For research and development purposes (to understand our business better and develop products and services).

Use justification: Legitimate Interests

- b) To monitor certain activities such as calls and transactions (in order to ensure service quality and combat fraud).

Use Justification: Legal Obligations, Legal Claims, Legitimate Interests

- c) To inform you of changes to our services and products.

Use Justification: Legitimate Interests

- d) To ensure website content is relevant.

Use Justification: Legitimate Interests

- e) You agree that Arbolus may disclose your information in response to legal process, to protect Arbolus's or a Arbolus Client's rights, as otherwise required by law or if pertinent to judicial or governmental investigations, or for the prevention or detection of a crime or fraudulent conduct. If Arbolus sells all or part of its company or enters into a partnership with another business entity, you agree that Arbolus may disclose your information to its new business partners or owners who may then provide you with information about their products and services.

Use Justification: Legitimate Interests, Legal Claims, Legal Obligations

If you are an Expert:

- a) We may use your Personal Information to contact you by email, telephone, SMS, or otherwise, to discuss opportunities to participate in Client engagements, to arrange consents for Client engagements, to comply with applicable laws, and to tell you about Arbolus's business. If you are engaged on a Client Project, we will share your contact information with Clients such that they are able to reach you.

Use Justification: Legitimate Interests, Consent

- b) We may disclose your information to Clients and non-Client third parties for the purpose of evaluating your experience set. Such information may be biographical information, information in respect of the number of times you have consulted with Clients and/or information in respect of feedback received in respect of those interactions. You consent to Arbolus collecting and maintaining your information. You agree that Arbolus's processing of your information is necessary to facilitate your engagement with Clients, to service its other Clients, and to further its business purposes.

Use Justification: Legitimate Interests

- c) We may also use your information to promote Arbolus's business (including without limitation by displaying such information on any of Arbolus's websites, Arbolus's third party partner websites, print media, and other materials - collectively, "Marketing Materials"). You may opt-out of promotional use by contacting Arbolus. If you opt out of this promotional use or terminate your agreement with Arbolus, Arbolus will use reasonable efforts to discontinue creating and distributing Marketing Materials that contain your information.

Use Justification: Legitimate Interests

- d) You understand that Clients may be required, by law or their own compliance policies, to disclose certain details of their interactions with you, including your name and the amount you were paid ("Required Client Disclosures"). You authorize Arbolus Clients, or Arbolus on their behalf, to make Required Client Disclosures and you agree to provide any additional information necessary to complete any Required Client Disclosures.

Use Justification: Legal Claims, Legal Obligations

- e) You agree that Arbolus may, if it so chooses, verify your identity, conduct a background check on you, including through a third-party service, seek to confirm your employment history and education credentials, as well as check for any criminal history. Arbolus may also seek to verify the accuracy of the invoices you submit and confirm the substance of your discussions with Clients. As it conducts background checks and other verifications, you agree to cooperate with Arbolus and provide any necessary consent.

Use Justification: Legitimate Interests, Legal Claims, Legal Obligations

If you are a Client / prospective Client:

- a) You agree that in order to administer our services and carry out our obligations arising from any agreements entered into between you and us, we may occasionally pass your data to third parties (e.g. legal, financial, business or other advisors).

Use Justification: Legitimate Interests, Legal Claims, Legal Obligations

- b) You agree we may use your data and personal information to provide you with relevant content or marketing materials (where you have opted to receive these) in order to optimise our service to you. We will provide an option to unsubscribe or opt out of further communication on any electronic marketing communication sent to you.

Use Justification: Legitimate Interests

- c) You accept that we may use your personal data to ensure we collect due payments through the engagement of debt collection agencies or legal advisors.

Use Justification: Legitimate Interests, Legal Claims

4 Legal justifications for use of personal information:

Under EU data protection laws, use of personal information must be justified under certain "grounds". An explanation of the scope of these grounds can be found below:

Consent: where you have consented to our use of your information (you will have been presented with a consent form in relation to any such use)

Contract Performance: where your information is necessary to enter into or perform our contract with you

Legal Obligation: where we need to use your information to comply with our legal obligations

Legitimate Interests: where we have a legitimate interest in using your data and our reasons for using it are not outweighed by any adverse impact on your interests, fundamental rights or freedoms

Legal Claims: where your information is necessary for us to defend, prosecute or make a claim against you, us or a third party

5 Transmission, storage and security of your personal information:

5.1 Security over the internet

No data transmission over the internet can be guaranteed to be secure from intrusion. We encrypt your information to the highest reasonable professional standards and maintain it in accordance with data protection legislative requirements.

Should you have a password or login, you are responsible for keeping this confidential.

5.2 Storage of data

All data you provide is stored on our subcontractors' secure servers within the EU.

You agree to Arbolus transferring your information to Arbolus's European offices, holding such information on its EU based databases, and Arbolus sharing your information with its global subsidiaries and affiliates who may be outside the EU (a list of subsidiaries can be provided upon request).

5.3 Storage / Retention timelines

We will retain your information for as long as necessary for the processing purposes for which they were collected.

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 requirements.

5.4 Third Party Links

Our website may contain links to or functionality of third-party websites, plug-ins or applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control those third-party websites and are not responsible for their privacy policies or data handling procedures.

6 Contacting us and Your Rights:

6.1 Marketing

You have the right to ask us to not to process your personal information for marketing purposes. You can contact us at any time at privacy@arbolus.com in order to opt out and can also make such requests through unsubscribe links in our emails.

6.2 Your Rights

You have the right to require us to:

- a) Provide you with further details on the way we use your information;
- b) Provide you with a copy of information that you have provided to us;
- c) Update any inaccuracies in the personal information we hold;
- d) Delete any personal information that we no longer have a lawful ground to use;
- e) Where processing is based on consent, to withdraw your consent so that we stop that particular processing;
- f) Object to any processing based on the Legitimate Interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
- g) Restrict how we use your information whilst a complaint is being investigated

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights, we will assess your entitlement and respond in most cases within a month.

If you are not satisfied with our use of your personal information or our response to any exercise of these rights you have the right to complain to the Information Commissioner's Office, however we would appreciate the chance to deal with your concern directly in the first instance so please contact us at privacy@arbolus.com as a first step.

6.3 Updating Information

We will use reasonable endeavours to ensure that your personal information is accurate. In order to assist us with this, you should notify us of any changes to the personal information that you have provided to us by contacting us as set out in paragraph 6.4 below

6.4 Contacting Us

If you have any questions in relation to this Policy, please contact us at privacy@arbolus.com

6.5 No Fee Required

You will not have to pay any fee(s) in relation to requests to access your personal data. If your request is clearly unfounded, repetitive or excessive, we may charge a reasonable fee, or we may refuse to comply with your request.

6.6 Time Limit to respond:

We will endeavour to respond to all legitimate requests within one month of receiving such a request. Occasionally it may take us more than a month if your request is complex or repetitive. In such instances, we will notify you and keep you updated on the progress.

7 Cookies Policy:

Arbolus Group uses Cookies on all our websites. Cookies are text only strings of characters identifying a visitor's browser – when you visit any of our websites. You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is set. Arbolus records every visit to its websites and logs web request and internet protocol address information. If you disable or refuse cookies, please note that some parts of our websites may become inaccessible or not function properly.