



Candidate Privacy Notice

EFFECTIVE DATE: JULY 15, 2024

Twig Education Ltd. and Robotify Labs Ltd., collectively known as Imagine Learning Studios (“Imagine Studios”, “our”, “we”, “us”) takes your privacy seriously and wants to ensure transparency regarding how we handle your data. This privacy notice explains how we collect, use, process, and store your data during our recruitment process.

1. Data Controller

Imagine Studios are data controllers under the General Data Protection Regulation (“GDPR”), meaning they determine the processes to use when using your personal data. Our contact details are as follows:

Twig Education Ltd., 14 North Claremont Street, Glasgow, G# 7LE, United Kingdom.

Robotify Labs Ltd., Wework c/o, 2 Dublin Landings, North Wall Quay, office 01-127, Dublin 1, Dublin, d01v4a3, Ireland.

2. Purpose of Data Processing

We process your data solely for recruitment purposes and to carry out our legal responsibilities. This includes assessing your qualifications, conducting interviews, and evaluating your fitness for the position. We will also carry out verification checks in relation to your right to work in the UK.

3. Types of Data Collected

The data we collect may include:

- Name
- Contact information including your address, email address, phone numbers
- Disability information
- Resume/CV, including cover letter, references, education history, and employment history
- Interview notes
- Documentation relating to your right to work in the UK
- Driving licence or passport

We operate CCTV at our premises. While you are on-site at any of our offices, you may be recorded by our CCTV system. We also collect information about which areas of our premises you visit through our building access systems. We may combine any information you give us with information we collect about you from any of the sources listed.

We do not collect any special categories of personal data as part of the recruitment process. Special category personal data reveals racial or ethnic origin, political opinions, religious or philosophical belief, trade union membership, genetic data and biometric data processed for the purpose of uniquely identifying a natural person, health data, and data concerning sexual orientation or sexual life.

4. Third Parties

We may share your information internally with our subsidiaries or affiliates under the control of our corporate parent and service providers (e.g., applicant tracking system) that help us with the recruitment process.

5. Legal Basis for Processing

Our legal basis for processing your personal data is your explicit consent and our legitimate interest. You have the right to withdraw your consent at any time.



6. Data Transfer to the United States

Your data will be transferred to and stored in the United States. The United States may not have the same data protection laws as the EU or UK, but we take appropriate measures to protect your data.

7. How We Collect Data

You directly provide us with most of the data we collect. We collect data and process data when you:

- Complete an online application for a job with us
- Submit documentation to us in support of your qualifications
- Participate in a job interview

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references, or credit reference agencies.

Personal data is kept in personnel files or within Imagine Studios's HR and IT systems. We have implemented appropriate technical and organisational measures to protect the data.

8. Data Retention

We retain your data for as long as necessary to complete the recruitment process. Your data will be deleted within 6 months of completion of the recruitment process unless we obtain your consent to keep your records on file for 12 months for future job vacancies.

If your application is successful, your data will be kept and transferred to your employment file with us.

9. Automated Decision-Making

No decision will be made about you solely based on automated decision-making (where a decision is made about you using an electronic system without human involvement) which significantly impacts you.

10. Your Rights

You have the right to access, rectify, and erase your personal data with us. To exercise your rights or for any inquiries, please contact our Privacy office at privacy@imaginelearning.com.

11. Making a Complaint

If you think your data protection rights have been breached in any way by us, you are able to make a complaint to us at privacy@imaginelearning.com or the local supervisory authority.

Job Candidates in the UK: The Commissioner's Office (ICO), website: <https://ico.org.uk/make-a-complaint/>, telephone number: 0303 123 1113.

Job Candidates in the EU: The Data Protection Commission (DPC), 21 Fitzwilliam Square South, Dublin 2 D02 RD28, email address: info@dataprotection.ie.

12. Changes to This Notice

We may change this Notice from time to time.