

# PRIVACY NOTICE

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Last updated: MAY 2018

This privacy notice (“Notice”) describes how Gradbase Limited and its related companies collect, use and share personal data of (i) **users** of the website, [www.gradba.se](http://www.gradba.se) ; (ii) **Candidates** who register to upload their details onto the Gradbase Service.

Please take a moment to read this Notice which explains how we collect, use, disclose and transfer the personal information that you provide to us (or instruct others to provide to us) on our websites or mobile applications and/ or when you register as a Candidate with us.

By visiting our site and providing us with your personal data, you acknowledge and agree that your personal data may be processed for the purposes identified in this Notice.

You can find out more about Gradbase Limited, the Terms of Use for using our site at [https://www.gradba.se/terms\\_and\\_conditions/](https://www.gradba.se/terms_and_conditions/) and our Candidates’ Terms at [https://www.gradba.se/candidates\\_terms/](https://www.gradba.se/candidates_terms/) .

## **WHO WE ARE & CONTACT INFORMATION**

Gradbase Limited is a company with registered offices at 38 St.Martin's Lane, Apt. 4.1, London WC2N 4ER.

We welcome your comments about this Notice. If you have any questions about how we use your personal data, please do not hesitate to contact us at:-

38 St.Martin's Lane, Apt. 4.1  
London WC2N 4ER  
E-mail: [contact@gradba.se](mailto:contact@gradba.se)  
Phone: 07528227451

## **WHAT PERSONAL DATA DO WE COLLECT?**

We get information about you in a number of ways:

### **Information you give us.**

If you are a Candidate we may collect your name, email address, username,

password, picture, occupation and job history as well as other information you directly give us or post on our site and when you register with us including details of courses you have completed, educational institutions you have attended and awards and qualifications you have attained. We may also collect personal information from you from forms you may have submitted to us and when you write or speak to us (for example, when you send us e-mails or letters, or call us).

### **Information we get from others.**

We may get information about you from other sources but only where you have given consent or agreed that a party can provide us with the information concerned. We may add this to information we get from this site. If you have registered with us as a Candidate then you will have agreed that we may contact your Qualification Provider to obtain information to verify that your qualifications and other information you or they have given us are accurate. This information may include confirmation that you attended a Qualification Provider, that you completed a particular course, your dates of attendance and the date and grade of qualification awarded to you. You may also consent to your Qualification Provider letting us have, or verifying authenticity of, a photograph(s) that they have of you or you have supplied. Qualification Providers may also distribute and collect Gradbase registration documentation on our behalf which they may through pass to us.

### **Information automatically collected.**

We automatically log information about you and your computer. For example, when visiting our site, we log your computer operating system type, browser type, browser language, the website you visited before browsing to our site, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our site.

### **IP Addresses**

We may collect information about your computer or mobile device, including where available your IP address, operating system, login times and browser type. We use this information to better understand how visitors use our site and for internal reporting purposes. We may anonymise and share this

information with advertisers, sponsors and/or other businesses.

## HOW DO WE USE YOUR PERSONAL DATA?

We use your personal data for the following purposes:

- To verify with your Qualification Provider that details you have provided (in particular that you have completed a particular course, your dates of attendance, the date and grade of qualification awarded to you and the Qualification Provider) are correct.
- To allow Employers who are authorised to use the Gradbase Service to confirm that your qualifications (in particular that you have completed a particular course, your dates of attendance, the date and grade of qualification awarded to you and the Qualification Provider) are correct. This will be done via a **Blockchain** – please see below. Such Employers will have access to your Qualification Details (such as confirmation that you attended a Qualification Provider, that you completed a particular course, your dates of attendance and the date and grade of qualification awarded to you) and any picture your Qualification Provider has provided via the Blockchain by scanning a QR Code we create and which you may choose to make available to them.
- To allow users of our Freemium Service to access limited data about you including your name and the name of your Qualification Provider by use of a QR Code which you make available to them.
- To allow you to complete a personal Portfolio (to which you can add a personal photograph and details of your job history) which will be visible to Registered Employers.
- To store in our own database(s) - including your first name, last name, qualification(s) and email address, position (for professional qualifications) and picture all in encrypted form for administrative purposes. All data added to your personal Portfolio may also be stored in our own database.
- To liaise with your Qualification Provider.
- To manage your account access and password.
- To operate, maintain, and improve our sites and services.
- To respond to comments and questions and provide customer service.
- To send information including confirmations, invoices, technical notices, updates, security alerts and support and administrative

messages.

- Where you have agreed that we may do so, to communicate about promotions, upcoming events, and other news about services offered by us and any selected partners;
- to link or combine user information with other personal data;
- to protect, investigate, and deter against fraudulent, unauthorized, or illegal activity; and
- to provide and deliver services at Candidates 'request.

## **WHAT IS A BLOCKCHAIN?**

Details supplied to us by your Qualification Provider (including details of courses you have completed, educational institutions you have attended and awards, certificates, qualifications and grades you have attained) will be made available to Employers and processed by means of a **Blockchain**. A Blockchain is a digital ledger of transactions, agreements, contracts - anything that needs to be independently recorded and verified as having happened. The big difference between Blockchain and a regular database is that the former isn't stored in one place, it's distributed across several, hundreds or even thousands of computers around the world. Moreover, data in a Blockchain cannot be retrieved as it was uploaded, just verified as having been uploaded at an earlier point in time.

What are the advantages of a Blockchain?

Data in a Blockchain can never be tampered with, nor removed. This is because modifying the ledger would involve concurrently modifying the ledger on the majority of the computers that form the Blockchain. Currently, no one has the processing power to perform such an action. Moreover, strict cryptographic mechanisms are in place that enable unauthorised, local modifications to be detected and rejected.

How do we use it?

We currently make use of the Bitcoin Blockchain as a means to store the details provided by Qualification Providers (although we may use any other Blockchain in the future at our discretion) and to allow them to be verified by Registered Employers.

## WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We do not rent, sell or share personal information about you with other people or companies except under the following circumstances:

- As part of our service we allow Employers who have registered to use the Gradbase Service to access (via your QR Code) the following information about you to confirm that they are correct: your name, qualifications awarded and dates of award, grades attained, institutions attended and your personal photograph. **You should not share your QR Code with anyone who you do not want to access these details**
- Where you have created a personal Portfolio this may be viewed by Employers who have registered to use the Gradbase Service. **Please do not upload any data onto your Portfolio that you do not wish to be available to such employers.**
- Employers who have registered to use the Gradbase Service may access all the details on any personal Portfolio you create including any personal photograph that you choose to upload.
- Freemium Users of the Gradbase Service may access (via your QR Code) your full name and the name of your Qualification Provider. **You should not share your QR Code with anyone who you do not want to access these details.**
- We may share your details with Qualification Providers to verify them and to administer the Gradbase Service.
- When we do a business deal, or negotiate a business deal, involving the sale or transfer of all or substantially all of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.
- For legal, protection, and safety purposes;
  - to comply with laws or any regulatory obligation;
  - to respond to lawful requests and legal processes;
  - to protect the rights and property of Gradbase Limited, our agents, customers and others. This includes enforcing our agreements, policies and Terms of Use.
  - in an emergency. This includes protecting the safety of our employees and agents, our customers, or any person.
- With those who need it to do work for us.

We may also share aggregated and/ or anonymised data with others for their own uses.

## **ON WHAT LEGAL BASIS DO WE USE YOUR PERSONAL DATA?**

We use your personal data either:-

- To allow us to provide the **services** to you that are set out in our **Candidates terms, in our Website Terms, our Acceptable Use Policy and in this Privacy Notice**; or
- Where you have given us explicit **consent** to use it for a specific purpose, for example, where you agree to upload your photograph to be shared with Employers or where you have agreed that we may send you details of services or products we think may interest you. We will always ask for consent separately when we do this. Where we are using your personal data because you have given us specific consent to do so then you can withdraw this consent at any time.

## **INTERNATIONAL TRANSFER OF PERSONAL DATA**

Your personal data may be collected, processed and/or otherwise transferred outside the European Economic Area (**EEA**) and may be processed not only in the country in which it was collected but also in other countries, including the EEA and the United States. Some countries' data protection and privacy laws and regulations may not offer the same level of protection as in the EEA. Gradbase is a company registered within the EEA and as such we commit to you that if you are an EU citizen where we share your personal data with a third party outside the EEA we will always use a process that accords with the law and our obligations thereunder as a data processor. Where data subjects and data controllers are outside the EEA, by providing your personal data to us, you consent to such transfer, collection and/or processing in other territories of your personal data, which includes the use of cookies as described in our cookies Policy.

## **PROTECTING YOUR INFORMATION**

We want you to feel confident about using our site, and we are committed to protecting the personal information we collect. Other than any information which you have chosen to make publicly available, we limit access to personal information about you to Freemium Users, Registered Employers and to Qualification Providers as set out in this Privacy Notice and to employees who reasonably need access to it, to provide products or services to you or in order to do their jobs. We have appropriate technical and organisational physical, electronic, and procedural safeguards to protect the personal information that you provide to us against unauthorised or unlawful processing and against accidental loss, damage or destruction.

## **RETENTION PERIOD**

We will retain your personal data for the period necessary to fulfil the purposes outlined in this Notice unless a longer retention period is required or permitted by law. We have the right to delete your data from our database and to stop providing the Gradbase Service to you after a reasonable period of lack of use as we reasonably determine in line with our policies.

Please note that data in a Blockchain cannot be permanently deleted but we can make it unavailable after a reasonable period of lack of use and/or if you choose to delete your details on our “Settings” page.

## **YOUR RIGHTS**

You have the right to ask us at any time:-

- to confirm whether we hold any of your personal data;
- to send you a copy of any personal data that we hold about you;
- to correct any inaccuracies in and to update any of your personal data;
- to delete (to the extent possible) any of your personal data, where we are required by law to do so;
- to stop processing your personal data, where we are required by law to do so;
- to let you have a portable copy of the personal data we hold about you, where we are required by law to do so;
- to stop sending you marketing material. However please note that we may continue to send you service related (i.e. non-marketing)

communications, such as email updates).

If you wish to exercise any of these rights, or wish to object to our use of your personal information, please write to us at the address given below.

## **CONCERNS**

If you have any concerns about our handling of your personal data please contact us at:-

Gradbase Ltd  
38 St.Martin's Lane, Apt. 4.1  
London WC2N 4ER  
E-mail: [contact@gradba.se](mailto:contact@gradba.se)  
Phone: 07528227451

You also have the right to raise any concerns with The UK Information Commissioner:  
<https://ico.org.uk/>

## **CHILDREN**

This site is not directed at anyone who we know to be under the age of 16, nor do we collect any personal information from anyone who we know to be under the age of 16. If you are under the age of 16, you should not use the platform and should not submit any personal information to us.

## **CHANGES TO THIS POLICY**

From time to time we may change this Policy. If we make any changes, we will change the Last Updated date above. If you do not agree to these changes, please do not continue to use our site. If material changes are made to this Policy, we will notify you by email or by placing a prominent notice on the site.