

# CAREERCHAIN PRIVACY NOTICE V1

## 1. INTRODUCTION

CareerChain will be the first open, industry standard for sharing career histories. Job seekers will only need to enter their profile once, and apply everywhere. They will always remain in control of whom they share their data with, and their profile is never “owned” by a proprietary service.

CareerChain will be built on a private Ethereum platform with a Proof-of-Stake (PoS) consensus model and will issue tokens in 2018 from Stichting CareerChain, a foundation incorporated under Dutch law (the “ CareerChain Foundation”).

At CareerChain the privacy and security of our employers, seekers and visitors are of paramount importance. CareerChain is committed to protecting the data you share with us.

For the purpose of this policy, CareerChain defines

- the term “**Employer**” as an entity with which CareerChain has an established commercial relationship;
- the term “**Seeker**” as any individual who registers and responds to vacancies via the CareerChain mobile and web apps;
- the term “**Partner**” as any agency, Application Tracking System (ATS) and job-boards that contribute to the seeker profile and who will be rewarded tokens for that and;
- the term “**Visitor**” as an individual that visits our websites (for example [www.CareerChain.com](http://www.CareerChain.com)).

For the purpose of this policy, CareerChain defines the term “**Services**” as the combined activity of

- informing Visitors via our website and newsletters;
- enabling Seekers to register and apply for a vacancy;
- offering an Applicant Tracking System for the Employers and
- Enabling Partners to Integrate with the CareerChain global standard open platform.

## 2. COLLECTION AND USE

### 2.1 Why does CareerChain process personal data?

CareerChain processes some personal data to make our Services work for you. Personal data is data that describes you, and is linkable to you as a person. An example of personal data is your email address. We process your personal data so we can match recruitment information with vacancies, enable you to integrate our services into your own, enable you to pre-select candidates and evaluate how you use our Services. We don’t sell your personal data to anyone.

### **2.1.1 CareerChain can process your personal data for the following purposes:**

1. Operating the Services for Employers, Partners, Seekers and Visitors;
2. Creating and upholding your personal or business account, facilitating payment of your subscription fee and/or CCH tokens and informing you about new features and updates;
3. Providing (technical) support when you reach out to us;
4. Following up on abuse reports, Notice and Take Down reports and fraud investigations;
5. In so far as necessary: defending ourself in legal proceedings in relation to or as a result of your use of CareerChain Services, following a court order, abiding by any law, regulation or governmental request, cooperating with law enforcement, cooperating in fraud investigations of third parties, safeguarding national security, defence, public security or public health, and to uphold our Terms;
6. Evaluating the use of our Services as well as for statistical purposes.
7. When you have indicated so: enabling you to engage in actions, promotions or events we offer.

### **2.1.2 Legal base for processing**

Each processing activity has a valid legal base, which is described below.

**1. 2. and 3.** These are necessary for the performance of the contract, which are the Services we offer through CareerChain, on the web and through our mobile and desktop apps, and the accompanying Terms of Service.

**4. and 5.** These are to comply with our legal obligation. In case of a violation or when we need to uphold our Terms. For example, we need to be able to search or share (some of) your personal data.

**6.** Analysis of user behaviour is based on legitimate interest. This means we need this activity to protect and grow our business. Without being able to look at user behaviour we would most likely not learn enough about our users to offer you valuable and relevant Services.

**7.** We will only reach out to you once you have consented to that engagement. The legal base for sending you any email that isn't Service related is consent.

CareerChain does not sell or otherwise distribute your personal data to third parties and will not use your personal data for any other purposes than stated above without your prior consent. We give third party providers the possibility to add third party cookies to their service. For more information on cookies please see our [cookie statement](#). For more information on third parties see below. When CareerChain uses your data for evaluation of the use of our Services as well as for statistical purposes, we use pseudonymized data. This means that we cannot trace the data back to you directly.

**The following sections cover which data is collected from Visitors, Seekers and Employers.**

## **2.2 VISITORS**

By visiting our websites, you consent to the collection and use of your personal data as described herein. If you do not agree with the terms set out herein, please do not visit our websites. If required by applicable law, we will explicitly seek your consent to process personal data collected on our websites or volunteered by you. Kindly note that any consent will be entirely voluntary. However, if you do not grant the requested consent to the processing of your Personal Data, the full use of our websites may not be possible.

CareerChain may collect, record and analyse information of Visitors to its website. We may record your IP address and use cookies. CareerChain may add information collected by way of pageview activity. Furthermore, CareerChain may collect and process any Personal Data that you volunteer to us in our website's forms, such as when you register for events or sign up for information and newsletters. If you provide CareerChain with your social media details, CareerChain may retrieve publicly available information about you from social media.

Such personal data may comprise your IP address, first and last name, your postal and email address, your telephone number, your job title, data for social networks, interest in CareerChain products, as well as information as to the type of relationship that exists between CareerChain and yourself. CareerChain gathers data about visits to our websites, including numbers of Visitors and visits, Geo-location data, length of time spent on the site, pages clicked on or where Visitors have come.

### **2.2.1 Purpose of processing personal data**

CareerChain uses the collected data to communicate with Visitors, to customise content for Visitors, to show ads on other websites to Visitors, and make improvements or by analysing how Visitors navigate our website.

### **2.2.2 Sharing personal data**

CareerChain may also share such information with service vendors or contractors in order to provide a requested service or transaction, or in order to analyse the Visitor behaviour on our websites.

### **2.2.3 Cookies**

Cookies are small pieces of information sent by a website to a Visitor's local hard drive or SSD. Cookies cannot be used to run programs or deliver viruses to your computer. By continuing to visit the website, you agree to the placement of cookies on your device. If you choose not to accept our cookies, we cannot guarantee that your experience will be as fulfilling as it would otherwise be. We may also place cookies from third parties for functional and marketing purposes. The use of cookies is widespread and benefits the visitor. For further information, see [CareerChain Cookie policy](#)

### **2.2.4 Links to other sites**

Please be aware that while visiting our websites, Visitors can follow links to other sites that are beyond our sphere of influence. CareerChain is not responsible for the content or privacy policy of these other sites.

## **2.3 SEEKERS**

### **2.3.1. General**

In order to provide Services to its Seekers, CareerChain collects certain types of data from them. Seekers should be aware that by registering as a job applicant via the mobile or web app, they are voluntarily disclosing information that make them personally identifiable to CareerChain and the Employers that have issued the vacancy the Seeker applies to. This data may contain **contact** info such as CCH-adress, email address, name, telephone number, City of residence, and **content** info such as job history, curriculum vitae upload, motivation letter upload and 15 second video upload. Seekers applying to vacancies should be aware that you alone are responsible for the content you submit when applying. If you are an existing Seeker, we will only contact you by electronic means (e-mail, SMS or mobile push notification) with information about services similar to those you already use. If you are a new Seeker, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

### **2.3.1 Purpose of processing personal data**

CareerChain uses the collected data to enable the Seeker to apply to an Employer's vacancy. CareerChain retains all the answers, video's and documents for the sole use of the Employer's vacancy. CareerChain will not process personal data of Seekers for other purposes or by other means than providing the Services.

### **2.3.2 Sharing personal data**

CareerChain will not share your personal data supplied in the job application with any party except the Employers and Partners to receive it or manage it for their recruitment application process.

## **2.4 EMPLOYERS**

### **2.4.1. General**

In order to provide Services to Employers, CareerChain collects certain types of data from them. Employers should be aware that by registering as a vacancy issuer via the mobile or web app, they are voluntarily disclosing information that make them personally identifiable to CareerChain and the Seekers that are looking into the vacancy information. This data may contain **contact** info such as email address, name, telephone number, company address, and **content** info such as financial/fiscal information for invoicing purposes and job/company information. Employers registering to the Services should be aware that they alone are responsible for the content. If you are an existing Employer, we will only contact you by electronic means (e-mail, SMS or mobile push notification) with information about services similar to those you already use. If you are a new Employer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

### **2.4.2 Purpose of processing personal data**

CareerChain uses the collected data to enable Employers to pre-select job seekers to their vacancies. CareerChain stores all job seekers' answers, video's and documents for the sole use of the employers vacancy and the execution of the financial part of the contract. CareerChain will not process

personal data of Employers' employees for other purposes or by other means than providing the Services.

### **2.3.2 Sharing personal data**

CareerChain will not share any personal data supplied in the Employers' contact information with any party except with the Seeker to receive it or to apply to it for their job quest. CareerChain will share financial contact information with its payment/invoicing service provider to execute the reward mechanism in the underlying contract.

## **2.5 PARTNERS**

### **2.5.1. General**

In order to allow Partners to integrate and collaborate, CareerChain collects certain types of data from them. Partners should be aware that by serving as a profile contributor via the mobile or web app or API, they are voluntarily disclosing information that make them personally identifiable to CareerChain. This data may contain **contact** info such as CCH-address, email-address, name, telephone number, company address, and **content** info such as financial/fiscal information for token payment purposes and job/company information. Partners registering to the Services should be aware that they alone are responsible for the content. If you are an existing Partner, we will only contact you by electronic means (e-mail, SMS or mobile push notification) with information about services similar to those you already use. If you are a new Partner, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

### **2.5.2 Purpose of processing personal data**

CareerChain uses the collected data to enable Partners to integrate our Services to their own processes and to allow them to contribute to a seeker profile. CareerChain stores all Partners' personal data for the sole use of the the execution of the financial part of the contract. CareerChain will not process personal data of Partners employees for other purposes or by other means than providing the Services.

### **2.5.2 Sharing personal data**

CareerChain will not share any Partner personal data with any party except with the Seeker to receive it or to apply to their profile and/or career history. CareerChain will share financial contact information with its payment/invoicing service provider to execute the reward mechanism in the underlying contract.

**The following sections cover the more generic usage of personally identifiable information.**

## **3. THIRD PARTIES**

CareerChain requires the support of several third party partners to operate the Services. We may need to share some of your personal information with

these parties to provide the Services to you. These parties can be categorised as:

- File server
- Payment processor
- Email processor
- Analytics tools
- Ad server
- advertising partners

We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our Seekers (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in Amsterdam). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

Unless we tell you differently, our third parties do not have any right to use the personal information we share with them beyond what is necessary to assist us in making the CareerChain Services possible. Tasks of these third party companies and individuals include database and storage management, payment processing, analytics and general improvements of the Services. When we cooperate with third parties and they process your personal data on our behalf, we make sure your personal data will be handled with the same integrity and security as we do. If you need an extensive overview of our trusted partners, please reach out to [legal@CareerChain.com](mailto:legal@CareerChain.com)

### **3.1 Transmission of data**

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our websites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **4. RETENTION AND DELETION**

CareerChain will not enclose your data for any longer period than legally allowed and only as necessary for the purpose for which we have collected and processed your data.

### **4.1 Data types**

Data is an important resource and the fuel that powers the value that CareerChain brings to the job market. There are 2 main types of data in play:

1. User profile data. Any user data that is relevant for a job seeker's profile such as personal details, employment history, education & certifications, etc. The user data itself will be encrypted and stored on InterPlanetary File System ("IPFS"). The addresses of the latest profile data will be stored on CareerChain in a seeker smart contract.
2. Profile attribution data. A seeker profile written to CareerChain will have one or more contributors. Those are Partners who did work (integration

with CareerChain) and paid CCH Tokens (gas) to write this profile or updates to the chain. When the profile is used to apply for a job, the contributors all get a piece of the attribution reward.

## **4.2 Off-chain storage**

Off-chain storage shall be implemented via the InterPlanetary File System (IPFS). CareerChain works as an incentive layer on top of IPFS, that provides storage infrastructure for Seeker profile data via building and running distributed applications, and implementing smart contracts.

The IPFS database is immutable. Once data is stored it will be stored as long as the database exists. How long we enclose your data depends on the type of data and the purpose for which we have processed your data:

- If you are a registered Seeker, Partner or Employer, we will retain your data and the history in any case for the duration of your account. If you close your account, your private and public key will be erased and the encrypted data will remain encrypted.
- For legal and tax purposes we will keep the transaction information available for 7 years.

## **4.3 On-Chain storage**

Only references to the data (IPFS addresses) will be stored on CareerChain. The data will be encrypted with the Seeker's public key, so no one else can read it unless given permission from the Seeker themselves.

Complying with GDPR's "right to be forgotten" will be achieved through "soft erasure" (job seekers can destroy the keys required to read their encrypted data on IPFS, effectively rendering it thenceforth unreadable by anyone, since only a hash will exist on the public blockchain ledger from then on, with no personally identifiable information).

## **5. CAN MINORS USE CAREERCHAIN MOBILE AND WEB APPS?**

- If you live in a country in the European Economic Area you must be at least 16 years old (or such greater age required in your country) to register for and use CareerChain.
- If you live in any other country except those in the European Region, you must be at least 13 years old (or such greater age required in your country) to register for and use CareerChain mobile and web apps.

## **6. YOUR RIGHTS**

Under the General Data Protection Regulation or other applicable local laws, you have the right to access, rectify, port and erase your personal data, as well as the right to restrict and object to certain processing of your personal data. This includes the right to object to our processing of your personal data for direct marketing and the right to object to our processing of your personal

data where we are performing a task in the public interest or pursuing our legitimate interests or those of a third party. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your personal data. To exercise your rights you can also send a request to [legal@CareerChain.com](mailto:legal@CareerChain.com) and include a copy of a legitimate piece of identification.

## **7. ACCEPTANCE OF THESE CONDITIONS**

We assume that all Visitors, Seekers, Partners and Employers of the Services powered by CareerChain have carefully read this document and agree to its contents. If someone does not agree with this privacy policy, they should refrain from using our Services. We reserve the right to change our privacy policy when required. Continued use of our Services after having been informed of any such changes to these conditions implies acceptance of the revised privacy policy. This privacy policy is an integral part of CareerChain's user Terms.

## **8. CONTACT INFORMATION**

CareerChain Services are operated by Lean Innovations B.V., a Dutch limited liability company and fully owned subsidiary of StartMonday Technology Corp., registered at the Amsterdam Chamber of Commerce Business Register under 69220158, with offices located at B.2 John M. Keynesplein 12, 1066 EP, Amsterdam, Netherlands