



Document Title:	Global Privacy Policy
Version number:	3.1
Effective date:	August 2025
Author / Owner:	Geraint Jenkins
Reviewer(s):	Vincent O'Donoghue
Classification:	Public

At SocialTalent, we are committed to safeguarding the personal information of everyone who interacts with our services, whether you're visiting our website, using our learning platform, engaging with AI-enhanced features, or receiving communications from us.

This Privacy Policy outlines how we collect, use, share, and protect your information and describes your rights under applicable data protection laws, including the General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA).

1. Scope

This Privacy Policy applies to:

- Visitors to socialtalent.com and related subdomains
- Registered users of the SocialTalent platform
- Users interacting with our services, including email recipients and webinar attendees
- Administrators and customer personnel using our AI-enhanced talent tools
- All regions where we operate, including the EU/EEA, the United States, the UK, and other jurisdictions

It covers both manual and automated processing, including AI-generated features. This policy supplements our Standard Subscription Agreement and any product-specific notices.

2. Information We Collect

We collect the following types of data:

A. Information You Provide to Us

- Contact details (e.g. name, email address, phone number)
- Role, team, company, and professional information
- Account credentials (username, password)
- Survey responses, interview notes, or other platform input
- Customer support queries and feedback

B. Information We Collect Automatically



When you visit our website or use our platform, we automatically collect:

- Device information (e.g. IP address, browser type, OS)
- Activity data (e.g. clicks, time on page, navigation patterns)
- Log data (e.g. timestamps, user actions)
- Cookies and tracking technologies (see Section 6)

C. Information from AI-Enhanced Features

When interacting with AI features, we process:

- Job descriptions and requisition input
- Interview feedback
- Learning history and preferences
- Usage behavior to personalize suggestions

We do not use personal data to train foundational models (ours or third parties').

3. How We Use Your Information

We use your personal data to:

- Deliver platform functionality and personalized learning experiences
- Analyze hiring and learning behaviors to generate insights
- Respond to inquiries and provide support
- Conduct marketing (where legally allowed)
- Monitor platform performance and security
- Comply with legal or contractual obligations

4. Legal Basis for Processing (GDPR & Global Frameworks)

For individuals in the EU/EEA, UK, and similar jurisdictions, we rely on:

- Contractual necessity – for account access, learning delivery, and platform use
- Legitimate interests – for analytics, product development, and fraud prevention
- Consent – for marketing, cookies, and opt-in features
- Legal obligations – to comply with employment, tax, or regulatory requirements

You may withdraw consent at any time without affecting prior processing.

5. Your Rights Under Data Protection Laws

Depending on your location, you may have the following rights:

A. GDPR / UK GDPR / Similar Laws

You have the right to:

- Access – Request a copy of your personal data
- Rectify – Correct incomplete or inaccurate data
- Erase – Request deletion (“right to be forgotten”)



- Restrict – Limit the processing of your data
- Object – Opt out of certain uses (e.g. profiling, direct marketing)
- Portability – Receive your data in a machine-readable format
- Withdraw Consent – At any time

To exercise your rights, contact us at privacy@socialtalent.com.

B. California Residents (CCPA/CPRA)

In addition to the above, California residents may:

- Request disclosure of categories of data collected and shared
- Request access to specific personal information
- Request deletion of data (subject to exceptions)
- Opt out of “sale” or “sharing” of personal data (we do not sell personal data)

You can authorize an agent to make a request on your behalf. We will not discriminate against you for exercising your privacy rights.

C. Other Jurisdictions

Where applicable (e.g. Canada’s PIPEDA, Brazil’s LGPD), we comply with local privacy rights and provide access, correction, and deletion mechanisms.

6. Cookies and Tracking Technologies

We use cookies, pixels, and similar technologies to:

- Authenticate users
- Measure website performance
- Enhance usability
- Target or personalize marketing (with consent)

You can manage cookies through your browser or via our site’s cookie settings banner.

7. Data Sharing and Disclosures

We may share your data with:

- Service providers – e.g., cloud hosting, analytics, customer support
- AI vendors – acting under contract as data processors
- Legal authorities – where required by law or subpoena
- Business transfers – in case of acquisition, merger, or restructuring

We conduct Data Protection Impact Assessments (DPIAs) before using high-risk third-party tools.

8. International Data Transfers

We operate globally and may transfer data outside your home country. Where we do, we:

- Use Standard Contractual Clauses (SCCs) or UK Addendums
- Ensure vendor compliance with relevant security standards



Transfers from the EEA/UK/Switzerland are protected with appropriate safeguards.

9. Security Measures

We maintain industry-standard protections, including:

- Encryption at rest and in transit
- Access controls and role-based permissions
- Activity logging and monitoring
- Internal security training
- Regular third-party audits and penetration tests

We also apply privacy-by-design principles in AI product development.

10. Data Retention

We retain personal information for as long as necessary to:

- Provide services to you or your organization
- Comply with legal or contractual obligations
- Resolve disputes or enforce our agreements
- Improve our services using aggregate analytics

11. AI Transparency and Controls

Where AI is involved, we commit to:

- Clearly label AI-generated content
- Offer opt-outs or manual override options (where feasible)
- Provide explanations of AI outputs upon request
- Allow user feedback to improve quality
- Avoid fully automated decisions with legal or similar effects

All AI use is designed to support, not replace, human decision-making.

12. Children's Privacy

Our services are not intended for children under 16 years of age, and we do not knowingly collect their data. If you believe a child has provided us with personal data, please contact us for prompt deletion.

13. Changes to This Policy

We may update this policy periodically to reflect legal, technological, or business changes. We'll notify you of material changes via:

- Platform messages or banners
- Email (if you have an active account)

Your continued use of our services indicates acceptance of the updated policy.



14. Contact Information

To exercise your rights or ask questions about this Privacy Policy, please contact:

Head of Information Governance, Insight & Security
privacy@socialtalent.com

You may also contact your local supervisory authority if you're unsatisfied with our response.









