

Privacy Policy – Opus Futura

Table of content

Your Privacy Matters	1
Definitions	2
Legally binding contract	2
Data controller	3
Services	3
Automatic collection of data?	3
Collection and use of Personal Data	4
Processing of Collected data	5
Right to Delete Personal Data	6
Disclosure of Personal Data	7
Retention Period of Personal Data	8
Transfer of Personal Data	8
Special Disclosure for Residents of the EU/EEA	9
Exercising Your Rights	9
Use of Aggregated Data for Advertising and Media Communications	10
E-mail marketing?	11
Push notifications?	11
Links to Other Resources	11
Changes and Amendments	11
Acceptance of This Policy	11

Your Privacy Matters

At Opus Futura your privacy is paramount to us. We are committed to safeguarding the Personal Data you entrust to us and aim to provide a safe and secure experience when using our services. This Privacy Policy outlines our practices regarding the collection, use, and protection of your Personal Data. We believe in transparency, and our goal is to build your trust by adhering to the highest standards of data protection. Thank you for choosing Opus Futura. We are dedicated to protecting your privacy and ensuring you have control over your personal data.

Definitions

For the purposes of this Privacy Policy, the following terms shall have the meanings set forth below:

1. **Personal Data:** Any data relating to an identified or identifiable natural person, as defined under Article 4 of the GDPR. This includes data such as name, identification number, location data, online identifier, or factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
2. **Data Controller:** The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data, as defined under Article 4 of the GDPR. For the purposes of this policy, Opus Futura is the Data Controller.
3. **Data Processor:** A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller, as defined under Article 4 of the GDPR.
4. **Processing:** Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment, combination, restriction, erasure, or destruction, as defined under Article 4 of the GDPR.
5. **Consent:** Any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to them, as outlined in Article 4 of the GDPR.
6. **Third Party:** A natural or legal person, public authority, agency, or body other than the data subject, Data Controller, Data Processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data.
7. **GDPR:** The General Data Protection Regulation (EU) 2016/679 is a regulation in EU law on data protection and privacy in the European Union and the European Economic Area.
8. **Cookie:** A small file placed on your device that enables features and functionality of our website and service portal, helps us understand user preferences, and provides data for improving user experience.

Legally binding contract

This Privacy Policy constitutes a legally binding agreement between Opus Futura ("we," "our," or "us") and you, the user, regarding the use of your Personal Data. By accessing or using our services, you agree to the terms set forth in this policy. If you do not agree to these terms, you are advised not to use our services. This agreement governs the collection, use, and disclosure of your Personal Data as described herein.

Data controller

For the purposes of data protection laws, the Data Controller of your Personal Data is Opus Futura ehf. As the Data Controller, we are responsible for determining the purposes and means of processing the personal data collected through our website and service portal.

Contact data:

- **Company Name:** Opus Futura ehf., reg.no. 640622-0400.
- **Email:** gdpr@opusfutura.com

If you have any questions about this privacy policy, how we process your personal data, or wish to exercise your rights under applicable data protection laws, please contact us using the data provided above. You may also find answers to common inquiries in our Questions and Answers (Q&A) section on our website.

Responsibilities of the Data Controller:

As the Data Controller, Opus Futura is committed to:

- Ensuring that the processing of personal data is conducted in compliance with applicable data protection laws and regulations.
- Implementing appropriate technical and organizational measures to protect personal data from unauthorized access, use, or disclosure.
- Providing transparent data to individuals about the collection and use of their personal data.
- Respecting and facilitating your rights regarding your personal data under applicable laws.

Opus Futura takes privacy and data protection seriously and we continuously review and update our practices to ensure compliance with relevant data protection laws and uphold the privacy rights of all individuals.

Services

Opus Futura offers individuals to be anonymously matched with all jobs defined in the solution by registered companies. The individual use of the solution is entirely based on information from the user and their results from our assessment tools and references. The individual use includes the creation of a personal profile where individuals define their requirements and describe their work experience, skills and education. The algorithm supports automatic matching results, and the service is entirely based on the creation of a personal profile, information from the user and their actions/ assessment results.

Automatic collection of data

When you visit or interact with our website and service portal, we automatically collect certain data about your device and usage of our services. This data helps us improve our services and enhance the user experience. The data we automatically collect includes:

- **Device data:** We collect details about the device you use to access our website and service portal, such as the hardware model, operating system and version, unique device identifiers, and mobile network data.
- **Log data:** Our servers automatically record data about your use of the website and service portal, including your Internet Protocol (IP) address, browser type, internet service provider, referring/exit pages, operating system, date/time stamp, and clickstream data.
- **Usage data:** We gather data on how you use our website and service portal, including your interactions with different pages, features, and content.
- **Cookies and Similar Technologies:** We use cookies, web beacons, and similar technologies to collect data about your activities on our website and service portal. Cookies are small data files stored on your device that help us recognize repeat visitors and understand their preferences. You can manage cookie preferences through your browser settings, but please note that disabling cookies may affect the functionality of some parts of our website.

This automatically collected data is used to:

- Analyse trends and user engagement to enhance our services.
- Maintain and improve the functionality and security of the website.
- Personalize your experience and understand your preferences.
- Ensure compliance with applicable legal obligations.

By using our website and service portal, you consent to the collection of this data as described in this section.

Collection and use of Personal Data

Our service portal collects Personal Data from registered individuals to provide matchmaking services with hiring companies. Personal Data remains confidential and is not visible to companies until a match is made and the individual consents to share their data.

Types of Personal Data We Collect:

- **Account Details:** We collect your username, password, and other login credentials necessary to create and maintain your account.
- **Contact data:** This includes your email address and phone number for communication regarding your account and matches.
- **Basic Personal Data:** Such as your name, age, gender, and other demographic details you choose to provide.

- **Professional data:** data related to your educational background, work experience, certifications, and relevant skills.
- **Preference data:** Details about your job preferences, such as desired industry, role, work environment, location preferences, and other criteria important for matching.
- **Profile data:** Additional data you choose to provide, like a resume, portfolio, or personal bio to enhance your profile.
- **Job and Workplace Expectations:** Your preferences and expectations regarding salaries, desired co-worker dynamics, preferred work hours, types of assignments and projects, and other workplace conditions important to you.
- **Assessment Results:** data obtained from personality tests, qualifying exams, problem-solving assessments, and other evaluations conducted through our service portal to better understand your skills, qualifications, and fit for potential roles.
- **Publicly Available data:** We may collect data about you from public sources such as websites, social media platforms, professional networks like LinkedIn, and news articles to supplement and verify the data you provide, aligning with privacy laws and your privacy settings on those platforms.

Privacy and Visibility:

- Your Personal Data is kept confidential and is not displayed to companies during the initial matchmaking process.
- Once a match is identified, you will receive a notification with details of the potential match.
- Your Personal Data becomes visible to the matched company only if you explicitly consent to share it.
- You have control over which matches receive your Personal Data, ensuring your privacy preferences are respected.

Purpose of data Use:

- To facilitate the creation and maintenance of your user profile.
- To accurately match your qualifications and preferences with suitable companies.
- To communicate with you regarding matches and service portal updates.
- To enhance and tailor your experience on our service portal.

By using our service, you consent to the collection and processing of your Personal Data as described, while retaining control over its visibility. To make the services available to you, or to meet a legal obligation, we may collect and use certain Personal Data. If you do not provide the data that we request, we may not be able to provide you with the requested products or services.

Processing of Collected data

The data we collect from individuals and companies in our service portal is processed in a manner that ensures its security and confidentiality. We utilize the data to provide and

improve our matchmaking services, ensuring a personalized and efficient experience for both individuals and companies.

Purposes of Processing:

- **Profile Creation and Maintenance:** To establish and manage your account and profile, ensuring accurate and up-to-date data for effective matchmaking.
- **Matchmaking Services:** To analyse collected data, including skills, preferences, and assessments, to connect individuals with suitable jobs based on shared criteria and interests.
- **Communication:** To communicate with you regarding potential matches, service updates, and relevant notifications essential to your participation in our service portal.
- **Service Improvement:** To evaluate and improve our service portal and services, including troubleshooting, data analysis, and research, aimed at enhancing user experience and service portal efficacy.
- **Safety and Compliance:** To monitor, prevent, and respond to fraudulent activities, breaches of our terms, or other legal requirements.

Processing Methods:

- We employ automated methods to process the data. Automated systems use algorithms and machine learning to identify potential matches and suggest opportunities.
- Personal data is handled by authorized personnel only, who adhere to strict confidentiality obligations and use the data solely for intended purposes.
- We implement suitable technical and organizational measures to safeguard your data against unauthorized access, loss, or misuse.

By using our services, you consent to the processing of your data as outlined in this policy.

Right to Delete Personal Data

We respect your right to privacy and are committed to ensuring you have control over your Personal Data. As a user of our service portal, you have the right to request the deletion of your personal data at any time, in accordance with Article 17 of the General Data Protection Regulation (GDPR).

Exercising Your Right to Deletion:

- **Account Deletion:** You can delete your account directly through your account settings in our service portal. This action will remove your Personal Data from our active systems.
- **Personal Data Deletion Request:** If you wish to have specific personal data deleted or require assistance, please contact us at gdpr@opusfutura.com with your request. We will respond to your request in accordance with applicable data protection laws and the timelines set by the GDPR.

- **Processing Timeline:** Upon receiving your request, we will process it promptly and will confirm the deletion of your data within the timeframe prescribed by the GDPR.

Limitations and Legal Obligations:

- **Retention Obligations:** We may need to retain certain data for legal, security, or business reasons even after deletion has been requested. This includes compliance with legal obligations, dispute resolution, or enforcement of our agreements.
- **Anonymized Data:** Data that has been anonymized and cannot be used to identify you may be retained for analytical purposes.

Use of Impersonal Aggregated Data:

- We may use impersonal data in an aggregated and anonymized form to understand trends, perform statistical analysis, and enhance our services. This data does not identify individual users and is utilized solely for business and research purposes to improve the service portal's functionality and user experience.
- Additionally, we may use aggregated data to develop new features, services, or offerings. This includes insights to better tailor our service to market demands and user preferences while maintaining high standards of privacy and security.

We are committed to ensuring your data privacy and will take reasonable steps to secure the deletion of your Personal Data.

Disclosure of Personal Data

As the Data Controller Opus Futura is committed to maintaining the confidentiality of your Personal Data. We will only disclose your Personal Data under specific circumstances as outlined below, in compliance with GDPR and other applicable data protection laws:

1. **With Your Consent:** We may disclose your Personal Data to third parties if you have provided explicit consent for us to do so. This includes sharing data with matched companies, provided that you have granted your approval.
2. **Service Providers:** We may disclose Personal Data to trusted service providers who perform functions on our behalf, such as hosting services, data analysis, or customer support. These third parties are bound by contractual obligations to keep Personal Data confidential and to use it only for the purposes for which we disclose it to them.
3. **Legal Obligations:** We may disclose Personal Data if required to do so by law or in response to valid requests from public authorities (e.g., court orders, law enforcement agencies, or regulatory bodies) to comply with legal obligations.
4. **Business Transfers:** In the event of a merger, acquisition, reorganization, or sale of assets, your Personal Data may be transferred as part of that business transaction, ensuring that the acquirer commits to respect your personal data in a manner consistent with our Privacy Policy.
5. **Protection of Rights:** We may disclose Personal Data when we believe it is necessary to enforce our terms and conditions, investigate suspected fraud or other violations, to protect the rights and safety of our users, or to address technical issues.

6. **Research and Analytics:** Aggregated and anonymized data that does not identify you can be disclosed for research, analysis, or other business-related purposes to enhance our services and offerings.

We ensure that all disclosures are conducted with strict adherence to GDPR obligations, ensuring that Personal Data is protected and disclosed only when necessary and lawful. For further information on how we manage your Personal Data, please contact us at gdpr@opusfutura.com.

Retention Period of Personal Data

Opus Futura retains your Personal Data only for as long as necessary to fulfil the purposes outlined in this Privacy Policy, and in compliance with the principles of data minimization and storage limitation as specified in the General Data Protection Regulation (GDPR).

Criteria for Determining Retention Period:

1. **Duration of Services:** Personal Data will be retained for the entire period your account is active, and as long as necessary to provide you with our services effectively. Once your account is deactivated or closed, we will delete your Personal Data in 30 days, unless further retention is required by law or contract.
2. **Legal and Regulatory Requirements:** We will retain Personal Data as needed to comply with applicable laws and regulations, such as tax, accounting, and legal obligations. This may require retaining certain data for extended periods as dictated by legal requirements.
3. **Legitimate Business Purposes:** Personal Data may be retained for longer periods where necessary to fulfil legitimate business interests, including maintaining business records, combating fraud, resolving disputes, and enforcing our agreements, but not longer than three years from your last interaction with our services.
4. **Scientific, Historical, or Statistical Purposes:** Where applicable, data may be retained in an anonymized form for scientific, historical, or statistical purposes, ensuring that it cannot be used to identify any individual, in line with GDPR Article 89.

Transfer of Personal Data

Opus Futura may transfer your Personal Data to third-party service providers, partners, or affiliates located in countries outside of your own for the purposes of delivering our services. All such transfers are conducted in compliance with applicable data protection laws, including the GDPR, ensuring that adequate safeguards are in place to protect your data. These safeguards may include data transfer agreements incorporating the European Commission's Standard Contractual Clauses or other approved mechanisms.

Special Disclosure for Residents of the EU/EEA

If you are a resident of the European Union (EU) or European Economic Area (EEA), you are entitled to specific rights concerning your Personal Data under the General Data Protection Regulation (GDPR). These rights include:

1. **Right to Access:** You have the right to request access to your Personal Data that we hold, including data about how we process your data and the purposes of processing.
2. **Right to Rectification:** You are entitled to request corrections to your Personal Data if it is inaccurate or incomplete.
3. **Right to Erasure:** Also known as the "right to be forgotten," you can request the deletion of your Personal Data under certain circumstances, such as when the data is no longer needed for its original purpose, or you withdraw your consent.
4. **Right to Restriction of Processing:** You have the right to request that we restrict processing of your Personal Data, allowing us to store your data but not process it further, under certain conditions.
5. **Right to Data Portability:** You have the right to receive your Personal Data in a structured, commonly used, and machine-readable format, and to have that data transmitted to another controller, where technically feasible.
6. **Right to Object:** You may object to the processing of your Personal Data based on legitimate interests, direct marketing, or profiling related to direct marketing.
7. **Right to Withdraw Consent:** If processing is based on consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
8. **Right to Complain:** You have the right to lodge a complaint with a supervisory authority if you believe we have not complied with the requirements of the GDPR regarding your Personal Data.

To exercise any of these rights, please contact us at gdpr@opusfutura.com. We are committed to addressing your requests promptly and in accordance with GDPR requirements.

Exercising Your Rights

As a user of our service portal, you have certain rights concerning the personal data we hold about you. To exercise any of these rights, please follow the instructions below:

1. **Submission of Requests:** You can exercise your data rights by contacting us via email at gdpr@opusfutura.com or by using any data rights management tools available in your account settings. Please provide sufficient data to verify your identity and specify the particular right you wish to exercise.
2. **Verification Process:** To protect your privacy and ensure security, we may take reasonable steps to verify your identity before fulfilling your request. This may involve requesting additional data or documentation.

3. **Response Timeframe:** We are committed to responding to your request promptly. Under the GDPR, we aim to address all valid requests within one month of receipt. If additional time is needed, we will notify you of the extension and the reasons for it.
4. **Available Rights:** Depending on your location and applicable laws, your rights may include accessing your data, correcting inaccuracies, requesting deletion, limiting processing, objecting to processing, withdrawing consent, and data portability.
5. **Limitations and Exceptions:** There may be circumstances where we are unable to fully comply with your request, such as when it involves disproportionate effort, impacts the rights of others, or conflicts with legal obligations. In such cases, we will provide an explanation of our decision.
6. **Complaints:** If you feel we have not adequately addressed your concerns or data rights requests, you have the right to lodge a complaint with a relevant data protection authority in your jurisdiction.

For more detailed data about your rights, or if you have any questions or concerns, please contact us at gdpr@opusfutura.com.

Use of Aggregated Data for Advertising and Media Communications

Opus Futura may use aggregated and anonymized data of its customers for advertising purposes and when communicating with the media. This type of data provides insights and trends that do not identify any individual user, ensuring your Personal Data remains confidential.

1. **Advertising Use:** We may incorporate aggregated data to inform advertising strategies, both tailored and general. This helps us and our partners deliver more relevant content and messages to prospective and existing users, enhancing marketing effectiveness without compromising individual privacy.
2. **Media Communications:** Aggregated data may also be used when speaking to the media or in public presentations. This allows us to share insights about industry trends, user behaviours, and service portal performance in a manner that respects user privacy.
3. **Data Privacy:** All aggregated data used for these purposes is stripped of personal identifiers and is combined with other data so that it cannot be traced back to any individual user.
4. **Compliance Assurance:** Our practices comply with applicable data protection laws, including the GDPR, to ensure that your Personal Data remains secure and confidential.

By providing your data, you consent to its use in aggregated formats as described.

E-mail marketing

With your consent, we may use your email address to send you promotional content, newsletters, and information about our products and services that may be of interest to you. You can opt-in to receive these communications at the time of registration or through your account settings.

You have the right to withdraw your consent at any time. To opt-out of receiving future marketing emails, you can click the "unsubscribe" link included in each email, or you can contact us directly at hello@opusfutura.com.

Please note that even if you opt-out of marketing communications, we may still send you important account-related messages or notifications.

We are committed to protecting your personal data and will not share your email address with third parties for their marketing purposes without your explicit consent.

Push notifications

With your consent, we may send you push notifications to provide updates, promotions, and other information related to our services. You can manage your push notification preferences through your settings in the service portal. If you decide to opt out of push notifications, you will still receive essential communications regarding your account and services, but you may miss out on updates that enhance your experience.

Please note that standard data charges may apply when you receive push notifications. We are committed to protecting your personal data and will not use your information for push notifications without your explicit consent.

Links to Other Resources

Our service portal may contain links to external websites or resources that are not operated by us. These links are provided for your convenience and data purposes only. Please be aware that we have no control over the content and practices of these sites, and we cannot accept responsibility for their privacy policies. We encourage you to review the privacy policies of any external sites you visit.

Changes and Amendments

Opus Futura reserves the right to modify this Privacy Policy at any time. When we make changes, we will update the "Effective Date" at the top of this policy and may provide additional notice, such as sending you an email notification or posting a prominent notice on our website or service portal. We encourage you to periodically review this Privacy Policy to stay informed about how we are protecting your data.

Your continued use of our services following the posting of changes constitutes your acceptance of such changes. If you do not agree with the revised policy, please discontinue use of our services.

Acceptance of This Policy

By accessing and using our services, you acknowledge that you have read, understood, and agree to be bound by the terms of this Privacy Policy. If you do not agree with the terms, please do not access or use our services. Continued use of the services following any updates or changes to this policy will be deemed as your acceptance of those changes.