

Pluto Data Analytics – Privacy Statement

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Introduction

Your privacy is important to us. This Privacy Policy describes and explains the personal data that Pluto Data Analytics Limited (“**Pluto**”) collects, how we process it, and for what purposes.

Pluto offers a range of multi-sport data consultancy services that specialise in predictive analytics to forecast real-world outcomes. References in this Policy to Pluto’s services includes users of our social media and website at <https://plutodata.co.uk>, sports professionals about whom we collect data, and potential employees of Pluto Data Analytics Limited about whom we may collect Personal Data as part of our recruitment processes.

For the avoidance of doubt, this Privacy Policy does not apply to situations where we act on behalf of our customers, generally in the role as “data processor” or “service provider”, as defined by applicable data protection laws.

Pluto is committed to ensuring that your Personal Data is protected and secured in accordance with applicable legislation including the principles relating to the processing of personal data as set out in Article 5 of the UK GDPR.

What Personal Data Do We Collect?

When we use the term “personal data” in this Privacy Policy, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to an individual. Pluto collect your personal data as set out below.

Personal Data You Provide

When you contact Pluto or interact with us through our social media and website we may collect personal data such as your name, address, email address, telephone number and country of residence.

When you apply for a job with Pluto, including via our careers website at <https://www.plutodata.co.uk/careers> or via an external recruitment agency, we collect personal data such as your name, address, email address, telephone number, country of residence and any other personal data contained in your CV (if you submit one). If you are selected to attend an interview then we may collect additional personal data during the interview process, such as information about your current salary and benefits, information about your performance at the interview and any disability that we are required to make reasonable adjustments for during the interview process. If your application for employment at Pluto is successful and we make an offer of employment to you, then we may collect

additional personal data including to assess your right to work in the UK (such as a copy of your passport), your date of birth and your national insurance number.

As a multi-sports data analytics consultancy service provider, Pluto collect and process the Personal Data of certain sports professionals so that we can provide our specialised sports data analysis services. This information may include the name, gender, nationality and age of the individual as well as additional information related to their career and performance such as their former and current clubs, their current recruitment status, the league and countries within which that individual has competed, as well as a number of other statistical and/or performance-related data.

Automatically Collected Personal Data

Cookies are small text files that are placed on your device which web servers utilise and that can be retrieved later in the domain that placed the cookie. We use cookies to provide an enhanced user experience and assist you in navigating our website. For more information about our use of Cookies, please contact dataprocessing@plutodata.co.uk.

Our Legal Bases and How we Process your Personal Data?

As noted in the “What Personal Data We Collect?” section above, when you apply for a job with Pluto, we have a legitimate interest in collecting Personal Data during that recruitment process. Collecting this personal data allows us to consider job applications, assess a candidate’s suitability, determine the basis on which an offer of employment might be made, and to manage the overall recruitment process. We may also need to use and retain personal data to address any queries from candidates as to the way in which the recruitment process was handled. Pluto may also need to process personal data to comply with its legal obligations as an employer, such as verifying a candidate’s eligibility to work in the UK, or to ensure that we make the necessary reasonable adjustments for candidates that have a disability.

The collection and processing of Personal Data of certain sports professionals is fundamental to our business and accordingly we have legitimate interest in collecting and processing this personal data provided that these legitimate interests are not outweighed by your fundamental rights or freedoms.

Personal data that you have voluntarily provided through the use of our website is collected on the basis that you have consented to Pluto using it. This would include when you contact us to make a general enquiry about Pluto or the consultancy services that we offer. You are able to revoke your consent to this at any time by contacting us at dataprocessing@plutodata.co.uk.

How we Share Your Personal Data and Who has Access to it?

Personal Data that is collected as part of our recruitment process will only be shared internally with members of Pluto staff that are directly involved in interviewing you or making a decision about your potential employment with Pluto. We do not share a candidate's personal data with a third party unless we make an offer of employment to you, at which time it may be necessary to share your personal data with former employers for the sole purpose of obtaining a reference, and with employment background check providers in order to conduct industry standard pre-employment checks.

Personal Data that is collected from certain sports professionals in connection with our services as a multi-sports data analytics consultancy is provided to a small number of service providers (sub-processors) that support our business and where we utilise their technology resources for internal and operational purposes. We ensure that we limit the Personal Data we provide to only that which is necessary and only to be used for the purposes for which we disclose it to them. We also ensure that they are bound by obligations to keep personal data confidential and have in place and maintain industry leading security controls.

We may be legally required or otherwise be requested to disclose your Personal Data to law enforcement agencies or legal representatives, for example to cooperate with law enforcement investigations or other legal proceedings.

Data Security and How We Protect Personal Data?

The security of Personal Data is very important to Pluto. We have implemented and maintain appropriate technical, administrative, and physical security measures that are designed to protect your personal data from loss, misuse, unauthorized access, disclosure, alteration, and destruction and is processed only by individuals that are authorised and in accordance with this Privacy Policy. We regularly review our security measures to consider available new technologies and methods, and if you have any questions about the security of your personal data, you can contact us at dataprocessing@plutodata.co.uk.

We retain personal data for as long as necessary to provide our consultancy and other services as set out in this Privacy Policy. We will also retain personal data if it is necessary to comply with contractual and legal obligations, when we have a legitimate interest to do so, and for the exercise or defence of any legal claims we might receive.

The retention periods for the Personal Data that we collect will be different depending on the type and purposes for which we use that personal data. If you have any questions about the retention of your personal data, you can contact us at dataprocessing@plutodata.co.uk.

International Data Transfer

The Personal Data we collect may be transferred to and stored in countries outside of the jurisdiction you are in, to locations where we and our third-party service providers have operations.

In the event of a transfer, including to countries outside the European Economic Area (EEA), we will ensure that i) the personal data is transferred to countries that are recognised as offering an adequate level of protection, or ii) the transfer is made pursuant to appropriate safeguards such as standard contractual clauses adopted by the European Commission. The use of these clauses means that your Personal Data is protected in the same way as it is in the EEA. If you have any questions about these safeguards, then please contact us at dataprocessing@plutodata.co.uk.

Your Rights and Choices

You have rights and can also make choices about the collection and use of your Personal Data by Pluto. You can control your Personal Data that Pluto has obtained and exercise your data protection rights as highlighted in this section. Please note that some of these rights apply generally, while others will only apply in certain circumstances, and in some cases, your ability to access or control your personal data will be limited, as required or permitted by applicable law.

- **Right to access:** You have the right to obtain information about the Personal Data stored about you, including certain information about the processing.
- **Right to rectification:** You have the right to require us to rectify any incorrect or inaccurate personal data about you that we hold.
- **Right to erasure:** You have the right to require us to erase some or all your personal data.
- **Right to restriction of processing:** In certain circumstances, you have the right to require us to restrict the use of your data.
- **Right to withdraw consent:** Where you have previously provided your consent to the processing of Personal Data you are entitled to withdraw that declaration(s) of consent with future effect. However, this right to withdraw consent does not affect the legitimacy of any processing operations previously executed.
- **Right to data portability:** In certain circumstances you have the right to receive your personal data in a structured, commonly used, and machine-readable format and to share it with a third party.
- **Right to object to the processing:** In certain circumstances you have the right to object to the processing of your personal data.



To exercise any of the above rights, please contact us at dataprocessing@plutodata.co.uk. Please note that we reserve the right to not fulfil a request to exercise any of the above rights and choices if we are unable to ascertain your identity. If you are not satisfied with how we have responded to a request, you also have the right to lodge a complaint with the Information Commissioner.

How to contact us

You can contact us regarding this Privacy Policy by email at dataprocessing@plutodata.co.uk.