

## **Welcome to Amply's Privacy Notice.**

Nexarton Limited t/a Amply ("AmPLY", "we", "our" or "us") respects your privacy and is committed to protecting your personal data. This Privacy Notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This Privacy Notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here [\[LINK\]](#).

We will handle Your Personal Data in accordance with Data Protection Laws. Data Protection Laws means the Data Protection Acts 1988 to 2018, the General Data Protection Regulation (EU) 2016/679 (GDPR), and any other applicable law or regulation relating to the processing of Personal Data and to privacy, including the E-Privacy Directive 2002/58/EC and the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011, as such legislation may be supplemented, amended, revised or replaced from time to time and all guidance and codes of practice issued by a relevant supervisory authority, from time to time and which are applicable to us.

### **1. Important information and who we are**

#### **1.1 Purpose of this Privacy Notice**

- 1.1.1 This Privacy Notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when contacting us or submitting your CV.
- 1.1.2 This website is not intended for children and we do not knowingly collect data relating to children.
- 1.1.3 It is important that you read this Privacy Notice together with any other Privacy Notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Notice supplements the other notices and is not intended to override them.

#### **1.2 Controller and Processor**

- 1.2.1 For the purpose of the GDPR, you are a controller. You upload your personal data to [www.amply.co](http://www.amply.co) and determine who is entitled to view or receive it. We (Nexarton Limited t/a Amply) are a processor and enable this on your behalf. We are registered in Ireland under company number 815557, and we have our registered office at Two Haddington Buildings, 20 Haddington Rd, Dublin 4, D04 HE94, Ireland.
- 1.2.2 If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact [datamanagement@amply.co](mailto:datamanagement@amply.co)
- 1.2.3 You have the right to make a complaint at any time to the Office of the Data Protection Commission ("ODPC"), the Irish supervisory authority for data protection issues at [info@dataprotection.ie](mailto:info@dataprotection.ie). We would, however, appreciate the chance to deal with your concerns before you approach the ODPC so please contact us in the first instance.

### 1.3 Your duty to inform us of changes

- 1.3.1 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### 1.4 Third-party links

- 1.4.1 This website may include links to third-party websites, plug-ins and applications ("third party sites"). Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party sites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every third party site you visit.

## 2. The data we process about you

### 2.1 Types of Data

- 2.1.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 2.1.2 We may use, store and transfer different kinds of personal data about you (the majority of which you supply when you sign up to Amply) which we have grouped together as follows:
- (a) **Identity Data** includes first name, last name, any previous names, username or similar identifier, title, date of birth, photograph and gender;
  - (b) **Contact Data** includes billing address, email address and telephone numbers;
  - (c) **Financial Data** includes bank account and payment card details;
  - (d) **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;
  - (e) **Profile Data** includes your username and password, submissions of your CV to potential employers, your interests, preferences, feedback and survey responses;
  - (f) **Usage Data** includes information about how you use our website;
  - (g) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- 2.1.3 We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

- 2.1.4 . We do not collect any Special Categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. However you may have included some of this type of data in your CV.

### **3. Submission of your personal data**

3.1 You may use different methods to submit data about yourself including through:

3.1.1 **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:

- (a) register on our website;
- (b) submit your CV;
- (c) apply for a job;
- (d) subscribe to our publications;
- (e) request marketing to be sent to you;
- (f) enter a competition, promotion or survey;
- (g) give us some feedback; or
- (h) submit a query through [datamanagement@amply.co](mailto:datamanagement@amply.co).

### **3.2 Automated technologies or interactions.**

3.2.1 As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [datamanagement@amply.co](mailto:datamanagement@amply.co) cookie policy for further details.

### **3.3 Third parties or publicly available sources.**

3.3.1 We may receive personal data about you from various third parties and public sources as set out below:

- (a) Technical Data from the following parties:
  - (i) analytics providers such as Google ;
  - (ii) advertising networks such as Google; and
  - (iii) search information providers such as Google

## **4. How we use your personal data**

### **4.1 Lawful basis**

- 4.1.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances where:
- 4.1.2 we need to perform the contract we are about to enter into or have entered into with you;
- 4.1.3 it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- 4.1.4 where we need to comply with a legal or regulatory obligation.
- 4.1.5 Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at [datamanagement@amply.co](mailto:datamanagement@amply.co)

## 4.2 Purposes for which we will use your personal data

| Purpose/Activity                                                    | Type of data                                                                   | Lawful basis for processing including basis of legitimate interest                                                                   |
|---------------------------------------------------------------------|--------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| To register you as a new subscriber                                 | (a) Identity<br>(b) Contact<br>(c) Marketing & Communications<br>(d) Financial | (a) Necessary for our legitimate interests (to develop our services and grow our business)<br>(b) performance of a contract with you |
| To process and deliver your CV submissions to prospective employers | (a) Identity<br>(b) Contact<br>(c) Transaction                                 | performance of a contract with you                                                                                                   |
| To manage our relationship with you which will include:             | (a) Identity<br>(b) Contact                                                    | (a) performance of a contract with you                                                                                               |
| (a) notifying you about changes to our terms or privacy policy      | (c) Profile                                                                    | (b) necessary to comply with a legal obligation                                                                                      |

| Purpose/Activity                                                                                                                                                        | Type of data                                                                              | Lawful basis for processing including basis of legitimate interest                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (b) asking you to complete a survey                                                                                                                                     | (d) Marketing & Communications                                                            | (c) necessary for our legitimate interests (to keep our records updated and to study how customers use our services and develop our offerings)                                                                                                                                                |
| To enable you to partake in a prize draw or competition                                                                                                                 | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Usage<br>(e) Marketing & Communications | (a) performance of a contract with you<br><br>(b) necessary for our legitimate interests (to offer additional features to our customers)                                                                                                                                                      |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity<br>(b) Contact<br>(c) Technical                                              | (a) necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)<br><br>(b) necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you                            | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Usage<br>(e) Marketing & Communications | necessary for our legitimate interests (to study how subscribers use our service, to grow our business and to inform our marketing strategy)                                                                                                                                                  |

| Purpose/Activity                                                                                          | Type of data                                                             | Lawful basis for processing including basis of legitimate interest                                                                                                                                      |
|-----------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                           | (f) Technical                                                            |                                                                                                                                                                                                         |
| To use data analytics to improve our website, offers, marketing, subscriber relationships and experiences | (a) Technical<br>(b) Usage                                               | necessary for our legitimate interests (to define types of customers for our various offerings, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |
| To make suggestions and recommendations to you about offers that may be of interest to you                | (a) Identity<br>(b) Contact<br>(c) Technical<br>(d) Usage<br>(e) Profile | necessary for our legitimate interests (to develop our services and grow our business)                                                                                                                  |

4.3.1 We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms set out in paragraphs 4.4 – 4.8

#### 4.4 Promotional offers from us

4.4.1 We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

4.4.2 You will receive marketing communications from us if you have requested information from us, or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

#### 4.5 Third-party marketing

4.5.1 We will get your express opt-in consent before we share your personal data with any company outside Amply (other than service providers) for marketing purposes.

#### **4.6 Opting out**

- 4.6.1 You can ask us or third parties to stop sending you marketing messages at any time by contacting us at [hello@onamply.co](mailto:hello@onamply.co) at any time.
- 4.6.2 Where you opt out of receiving these marketing messages, this will not apply to communications between you and employers you have contacted. You must review the privacy policies of any such employers.

#### **4.7 Cookies**

- 4.7.1 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [\[LINK TO YOUR COOKIE POLICY.\]](#)

#### **4.8 Change of purpose**

- 4.8.1 We will only use your personal data for the purposes for which you submitted it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [\[hello@onamply.co\]](mailto:hello@onamply.co).
- 4.8.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 4.8.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **5. Who we share your information with**

- 5.3 We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- 5.3.1 third party suppliers who assist us in the provision of our service(subject to having appropriate contracts in place with such third parties). ;
- 5.3.2 third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets; alternatively, we may seek to acquire other businesses or merge with them; if a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice.

- 5.4 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **6. International transfers**

- 6.3 Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- 6.3.1 for certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in the European Union;
- 6.3.2 for certain service providers based in the US, we may transfer data to them under the Data Privacy Framework (if they are part of it) which requires them to provide similar protection to personal data shared between the Europe and the US.
- 6.3.3 Please contact us at [hello@onamply.co] if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **7. Data security**

- 7.3 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 7.4 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable supervisory authority or other regulator of a breach where we are legally required to do so.

## **8. Data retention**

- 8.3 We will only retain your personal data for as long as necessary to fulfil the purposes you submitted it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 8.4 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 8.5 By law we have to keep basic information about our customers (including Contact and Identity Data) for six years after they cease being subscribers for tax and other legal purposes.
- 8.6 In some circumstances you can ask us to delete your data: see [Request erasure LINK] below for further information.
- 8.7 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9. Your legal rights**

- 9.3 Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:
  - 9.3.1 [Request access to your personal data](#)
  - 9.3.2 [Request correction of your personal data](#)

- 9.3.3 [Request erasure of your personal data](#)
- 9.3.4 [Object to processing of your personal data](#)
- 9.3.5 [Request restriction of processing your personal data](#)
- 9.3.6 [Request transfer of your personal data](#)
- 9.3.7 [Right to withdraw consent](#)

- 9.4 If you wish to exercise any of the rights set out above, please contact us at [hello@onamply.co].
- 9.5 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- 9.6 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 9.7 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Your Legal Rights

- 10.3 As a data subject, you have the following rights under Data Protection Laws and we will comply with such rights in respect of your personal data. These rights are explained in more detail below, but if you have any comments, concerns or complaints about our use of your personal data, please contact us (see 'How to Contact Us' below). We will respond to any rights that you exercise within one month of receiving your request, unless the request is particularly complex, in which case we will respond within three months (we will inform you within the first month if it will take longer than one month for us to respond).

| Right                                        | Further Information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Right of Access<br/>(Article 15 GDPR)</b> | <p>You have the right to request a copy of your personal data. Requests for your personal data must be made to us (see 'How to Contact Us' below) specifying what personal data you need access to, and a copy of such request may be kept by us for our legitimate purposes in managing our service. To help us find the information easily, please give us as much information as possible about the type of information you would like to see. If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person, if possible. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person, if possible.</p> <p>We are also entitled to refuse a data access request from you where (i) such request is manifestly unfounded or excessive, in particular</p> |

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|                                                             | <p>because of its repetitive character (in this case, if we decide to provide you with the personal data requested, we may charge you a reasonable fee to account for administrative costs of doing so); or (ii) we are entitled to do so pursuant to Data Protection Laws.</p> <p>For security reasons, we will take reasonable steps to confirm your identity before providing you with any personal data we may hold about you.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Right of Rectification (Article 16 GDPR)</b>             | <p>You have the right to request that we amend any inaccurate or incomplete personal data that we have about you. If you would like to do this, please (i) email or write to us (see 'How to Contact Us' below); (ii) let us have enough information to identify you (e.g. name, registration details); and (iii) let us know the information that is incorrect and what it should be replaced with.</p> <p>If we are required to update your personal data, we will inform recipients to whom that personal data have been disclosed (if any), unless this proves impossible or has a disproportionate effort.</p> <p>It is your responsibility that all of the personal data provided to us is accurate and complete. If any information you have given to us changes, please let us know as soon as possible (see 'How to Contact Us' below).</p>                                                                                                                                                                    |
| <b>Right to Object (Article 21 GDPR)</b>                    | <p>You have the right to ask us to stop using your personal data, and we will comply unless there is a legal basis for us to continue using it, which we will explain to you.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Right to Erasure (Article 17 GDPR)</b>                   | <p>You can ask us to erase your personal data (i) where we do not need your personal data in order to process it for the purposes set out in this Privacy Notice; (ii) if you had given us consent to process your personal data, you withdraw that consent and we cannot otherwise legally process your personal data; (iii) you object to our processing and we do not have any legal basis for continuing to process your personal data; (iv) your personal data has been processed unlawfully or have not been erased when it should have been; or (v) the personal data have to be erased to comply with law.</p> <p>We may continue to process your personal data in certain circumstances in accordance with Data Protection Laws. Where you have requested the erasure of your personal data, we will inform recipients to whom that personal data has been disclosed, unless this proves impossible or involves disproportionate effort. We will also inform you about those recipients if you request it.</p> |
| <b>Right to Restriction of Processing (Article 18 GDPR)</b> | <p>You may request that we stop processing your personal data temporarily if (i) you do not think that your personal data is accurate (but we may start processing again once we have checked and confirmed that it is accurate); (ii) the processing is unlawful but you do not want us to erase your personal data; (iii) we no longer need the personal data for our processing; or (iv) you have objected to processing because you believe that your interests should override the basis upon which we process your personal data.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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|                                                                     | <p>If you exercise your right to restrict us from processing your personal data, we will continue to process the personal data if: (i) you consent to such processing; (ii) the processing is necessary for the exercise or defence of legal claims; (iii) the processing is necessary for the protection of the rights of other individuals or legal persons; or (iv) the processing is necessary for public interest reasons.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Right to Data Portability (Article 20 GDPR)</b>                  | <p>You may ask for an electronic copy of your personal data that you have provided to us and which we hold electronically, or for us to provide this directly to another party. This right only applies to personal data that you have provided to us – it does not extend to data generated by us. In addition, the right to data portability also only applies where (i) the processing is based on your consent or for the performance of a contract; and (ii) the processing is carried out by automated means.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Right to be Informed</b>                                         | <p>You have the right to clear, transparent and easily understandable information about your rights and about how we use your personal data. We use this Privacy Notice to inform you of your rights.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Right to Withdraw Consent</b>                                    | <p>Where processing is based on your consent, you have the right to withdraw your consent at any time with future effect by contacting us. However, if you do withdraw your consent we may not be able to continue to provide the service we offer to you.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Right to ask us to stop contacting you with direct marketing</b> | <p>We have a legitimate interest to send you electronic communications in connection with our service and related matters (which may include but shall not be limited to newsletters, announcement of new features etc. and which may also appear on social media platforms such as Facebook, LinkedIn, Twitter or Instagram). We may also ask you for your consent to send you direct marketing from time to time.</p> <p>You may be able to select your preferences with respect to direct marketing when registering with us. We may also ask you different questions for different services, including competitions. We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.</p> <p>You can ask us to stop contacting you for direct marketing purposes. If you would like to do this, please (i) click on 'unsubscribe' on an email; (ii) respond 'stop' on an SMS to a number notified to you; or (iii) send an email via 'How to Contact Us' below.</p> <p>We will provide you with information on action taken on a request to stop direct marketing - this may be in the form of a response email confirming that you have 'unsubscribed'. Unsubscribing from direct marketing does not unsubscribe you from essential electronic communications in respect of the administration of your use of our service.</p> |

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| <b>Rights in relation to automated decision making</b> | We do not attempt to collect further data without user consent that enables personally identifiable profiling of our users.                                                                                                                                                                                                                                                                                                                                 |
| <b>Right to Complain to the DPC</b>                    | If you do not think that we have processed your personal data in accordance with this Privacy Notice, please contact us in the first instance (see 'How to Contact Us' below). If you are not satisfied, you can complain to the DPC or exercise any of your other rights pursuant to Data Protection Laws. Information about how to do this is available on the DPC website at <a href="https://www.dataprotection.ie">https://www.dataprotection.ie</a> . |

## **11. How to contact us**

- 11.3 If you need to contact us with regard to any of your rights as set out in this Privacy Notice, all such requests should be made in writing by email to [ ].

[ ] September 2025