

CleverYak GDPR Compliance

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This GDPR Compliance Statement is provided by:
Deeplink Sarl-S ("CleverYak"/"we"), 7 Rue du Laboratoire, Luxembourg, L-1911, Luxembourg

GDPR (General Data Protection Regulation) is a legal framework that sets guidelines for the collection and processing of personal information from individuals who live in the European Union.

The protection of personal information is fundamental to the trust that our customers put in us when choosing to use CleverYak.

The entire CleverYak service runs in a web browser under the www.cleveryak.com domain;

- Browsing the CleverYak website.
- Hosting or participating in a CleverYak interview
- Accessing the 'Interview Manager' to set up, manage or review interviews within your company.

Below, we describe our compliance of the service with the regulation. Please do not hesitate to contact us at info@cleveryak.com if you need any additional information:

Cookies:

When using CleverYak for the first time, users are presented with a cookie consent dialogue that allows cookie preferences to be set.

Essential Cookies

By default, we store a very small number of 'essential' cookies which are required to make our website and service work correctly.

Usage Cookies

We request the ability to store additional cookies that help us understand usage of our services. The information used is only ever used to help improve our product and to help investigate technical issues.

Our Cookie Principles

We never share our users' activity on our website with other companies, except a few companies whose services we use to help deliver our services to you.

We do not allow other companies to track and store information about our users when they use our website.

We do not use advertising cookies, so our users will never see ads elsewhere as a result of using our website.

Updating Cookie Preferences

Cookie preferences can also be changed at any time by visiting the 'Cookie Policy' link on our homepage and selecting the 'Open Cookie Settings' option.

Detailed information about how we manage cookies can be found in our [Cookie Policy](#)

Terms of Service and Privacy Policy:

Our website offers direct access to the following documents:

- 'Terms of Service' - which describes the legal agreement between us and any person wanting to use our service.
- 'Privacy Policy' - which describes how we gather, manage and use data from use of our service.
- 'Cookie Policy' - which describes how we store and use cookies.
- This GDPR Compliance Statement.

Users are asked to agree to the CleverYak 'Terms of Service' and 'Privacy Policy' in the following two scenarios:

- when joining a CleverYak call without being authenticated (ie without being signed in with an interview account)
- When signing up for a CleverYak account

Recording Consent

Recording is a central feature of CleverYak, offering interviewers the ability to quickly review candidate performance with colleagues after the call has ended.

Before call recording can take place, all participants must opt in to giving consent for call recording to take place. This is how CleverYak manages this consent:

Interviewers with CleverYak accounts

By creating a CleverYak account, and agreeing to the CleverYak Terms of Use and Privacy Statements, interviewers grant permission for call recording to be enabled for any interview in which they host or participate. These users cannot opt-out of consenting to call recording on calls in which they participate.

Candidates (and Interviewers without CleverYak accounts)

On joining an interview, candidates are informed that call recording may be enabled by the interviewer for the call they are about to join and that by continuing to join the call are giving consent to the recording. The same applies to interviewers joining a call without being signed in with a CleverYak account.

It's good practise for interviewers to inform invitees ahead of the interview if they intend to record it, and also to re-confirm this verbally on the call after recording has been started, giving all participants the option to ask for recording to be stopped.

During the call, a recording indicator is shown on-screen when recording is taking place.

Opt-in to Communications:

When signing up for a CleverYak account, users will receive an initial welcome email providing an introduction to CleverYak services. This welcome email also gives advice on how users can opt out of receiving future marketing communication from us. We will only ever use this permission to send CleverYak-related information. CleverYak never shares user account information including email addresses with 3rd parties for marketing purposes.

Once opted-in for marketing emails, users can easily opt-out in the future if they no longer wish to receive them.

The user's email address is also used to send transactional (account and service-based) emails, from which the user is not able to opt out.

Partner data processing

CleverYak has carefully considered the technology partners we work with to ensure the privacy and security of our customer data is protected.

We have listed the partners below with whom any customer data is shared:

	Subprocessor	Description	Location
Infrastructure	Microsoft Azure	Cloud Infrastructure	European Union
Infrastructure	Twilio	TURN Infrastructure In some cases, a server is required for relaying the call traffic between peers, since a direct socket is often not possible (depending on the network topology). For that we use Twilio as a service provider, with the call routed to a server geographically close to the user's location. TURN stands for Traversal Using Relay NAT, and it is a protocol for relaying network traffic. Even if routed through a TURN relay, the call remains end-to-end encrypted.	Worldwide. Privacy Shield Certified.
Billing	Stripe	Subscription management, automated billing and collections	European Union with USA/EU Privacy Shield certification where data is transferred to Stripe servers in the USA.
Communication	Sendgrid	Transactional and marketing email distribution platform	USA with Privacy Shield certification

Data Protection Officer

For information relating to CleverYak's data protection or compliance, please contact Theo Short at info@cleveryak.com

Data Subject Rights

GDPR empowers 'data subjects' (i.e. our users) with certain rights to help assure the privacy and protection of their personal data. To exercise these rights:

- Right of access: Customers can request more information about the personal data we hold about them.
 - For customers with a CleverYak account, on request CleverYak can provide details of all personal information we hold about that account.
 - For customers without a CleverYak account (users who participated in an interview as an interviewer or candidate) access to information can be obtained by contacting the interviewer who hosted the call. This content may include information shared during meetings, information about participants in meetings and any recordings of meetings. It is the responsibility of the interviewer, or the company on whose behalf they work, to provide this data if requested.
- Right of rectification: If a customer believes that any Personal Data held about them is incorrect or incomplete:
 - Users can directly correct (rectify) their personal data by logging into their CleverYak account and modifying their personal data in their user profile settings.
- Right to object / restrict processing: Customers may have the right to object or restrict their data processing for certain purposes.
 - To opt out of receiving marketing email, users can email info@cleveryak.com or unsubscribe using the link at the bottom of CleverYak marketing emails.
- Right to erasure:
 - For customers with a CleverYak account of which they are the sole user, the permanent deletion of this account and all associated data can be requested by contacting info@cleveryak.com
 - For customers with a CleverYak account which is part of an organisation with multiple user accounts, there are two options;
 - Option 1 - requesting to be removed from the organisation. This can be carried out by an admin user in the organisation. The user account will no longer be a member of the organisation, but the individual user account will remain active. Any interview records with which the user account is associated, including interview recordings, continue to be available to other users in the organisation.
 - Option 2 - complete removal of your account. This can be carried out via a request to info@cleveryak.com. When deleting a user account, any previously created interview data associated with the account being deleted (such as interview recordings) is not deleted and remains part of the organisation. If this data also requires deletion, a separate request from an admin user on the account must be made to CleverYak.

- If a user who participated in a CleverYak interview requests their data associated with that interview (including the call recording) to be deleted, this can be carried out by the interview host, or by a CleverYak administrator in that company.
- To delete an entire CleverYak organisation, a request can be made to info@cleveryak.com. Please be aware that on fulfilment of the request, all account data including interview data and associated recordings will be permanently and irrevocably deleted.