PRIVACY NOTICE Under General Data Protection Regulations from 25 May 2018

Who are we?

Results for People Ltd is an executive search and coaching company that works with candidates and clients on retained senior recruitment and coaching assignments.

Registered office address: Clarence House, Clarence Street, Leamington Spa, Warwickshire, CV31 2AD telephone: 07818 077560 / email: <u>ourteam@resultsforpeople.com</u>

We are committed to protecting the privacy of our candidates and clients and do our utmost to provide a safe and secure environment where we deal with your personal information. We adhere to the GDPR guidelines.

- We carry out our work in a fair and transparent way for both clients and candidates and on a legitimate basis as a recruitment and coaching organisation
- We only use data for a specific purpose
- We only keep data that is relevant and necessary to carry out the service we provide
- We endeavour to keep data up-to-date
- The data we keep will be kept securely, whether that is electronically or physically

What personal information do we collect about you?

We collect the information necessary to support coaching activity or to help us assess your suitability for a particular career opportunity. This can can include your name, contact details, family details, salary, qualifications, work history, career aspirations and CV.

Please note that information gathered as part of a coaching assignment may include sensitive data used for the specific and legitimate purpose of providing you with coaching services. This will be done with your consent and agreement that we can save and use this information for the duration of the coaching assignment or other specified duration and in accordance with this data protection declaration.

CV's may also include sensitive data such as information about ethnic or national origin, religious, political, philosophic convictions, memberships in unions or political parties, physical or mental health and sexual orientation. We recommend not to give any indication or information about those subjects. However, in the event that you inform us about such subjects, we will provide the relevant consent form for you to sign.

In terms of client information, we collect all necessary information on the client company, role and compensation package as laid out below, in order to undertake executive search and coaching assignments.

Where do we collect personal information about you from?

We may collect personal information about you from different sources including:

- **Directly from you**. This is information you provide in relation to a coaching assignment or while searching for a new opportunity (for example when you provide a CV) and/or during the different recruitment stages.
- From an agent/third party acting on your behalf.
- **Through publicly available sources** including Linked In and other social media platforms, Google, Company Websites and via Press Releases or Conference Listings.
- **Reference or word of mouth**. For example, you may be recommended by a friend, a former employer, a former colleague or even a current employer.

How do we use your personal information?

- Information is stored on a confidential cloud-based database is password protected and accessible only by Fiona Legros.
- Personal data is collected for a specific, explicit and legitimate purpose in order to undertake provide executive search and coaching services for our clients.
- We will never use your data for any other reasons beyond these explicit purposes.
- We may share your personal information with the client we are working with on an executive search assignment which can include basic data and / or your CV and contact details if you have given us consent to do so.
- It is agreed with all clients that, when data including CV's are submitted on this basis, it is their responsibility to treat it in confidence and not share information provided with third parties without your consent.
- Our clients are all based in the EEA and to the best of our knowledge work within the GDPR guidelines.

The usage of your personal information is based on our legitimate interests as an executive search and coaching business:

 We use certain personal data to determine your suitability for a particular role or in relation to a coaching assignment. This is necessary for our **legitimate interests** as an executive search and coaching company.

How long do we keep your personal information for?

Candidate data:

Executive search is dependent on the networks we put in place and the candidates we establish links with and, therefore, we keep your information stored securely on the database unless you ask for it to be removed.

We keep candidate data including CV's, career aspirations, salary and contact details and general information relating to a specific assignment or job search for as long as Results for People Ltd. is trading. This is important as it allows us to determine whether any future assignments we are working on may be of potential interest to you. If you notify us that you do not wish to be contacted again in the future (opt-out); your details will be removed from our database.

Coaching data:

In order to provide coaching services, we will collect non-sensitive data to allow us to register you as a client and may also collect non-sensitive data for the sole purpose of providing you with the agreed coaching services or if we need to comply with a legal obligation.

This data will be stored securely for the duration of the coaching and up to 3years if there is a likelihood of the coaching relationship being renewed in the future. If however you do not wish your data to be retained, either on our database or in hard copy form, please notify us in writing at <u>ourteam@resultsforpeople.com</u> or at Results for People Ltd, Clarence House, Clarence Street, Leamington Spa, CV31 2Ad (opt-out) and your details will be removed from our hard copy and database records.

Client data:

This is also stored securely on the database unless we are asked to remove it. The value of our business is built through years of networking and we keep in touch with most clients over a number of years.

For further understanding of your Rights of Access, please see Point 3 under your Rights below.

Who do we share your personal information with?

By you expressing an interest in a role, there is a legitimate interest in us introducing you through your CV and associated details (including contact details) in order to take the recruitment process forward. When a CV is freely sent to Results for People for general interest and future purposes, we will only ever share this when you have given us your permission to do so; this could be through email or verbal consent (we will confirm your consent via email).

Only very occasionally, some third parties may have access to our company laptop (for instance IT consultants carrying out testing and development work on our business technology systems). These third parties comply with similar and equally stringent undertakings of privacy and confidentiality under the terms of GDPR.

Where required we share your personal information with third parties to comply with a legal obligation; when we believe in good faith that an applicable law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce our Terms & Conditions of Business; to detect and protect against fraud, or any technical or security vulnerabilities; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to the our website, our business or the public.

Data Security

- All information is stored on a cloud based, GDPR approved and password protected database.
- Mobile phone: password protected.
- Access to our email account is password protected and emails are stored for one year only.
- Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

What happens if you do not provide us with the information we request or ask that we stop processing your information?

If you do not provide the personal information necessary or withdraw your consent for the processing of your personal information, we may not be able to match you with available job opportunities or provide coaching services as required.

Do we make automated decisions concerning you?

No

Do we transfer your personal information outside the EEA?

No, we do not transfer personal information out of the EEA.

What are your rights?

By law, you have a number of rights when it comes to your personal information. Further information and advice about your rights can be obtained from the data protection regulator in your country.

Rig	hts	What does this mean?
1.	The right to object to processing	You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities).
2.	The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.
3.	The right of access	In relation to a Subject Access Right request, you may request that we inform you of the data we hold about you and how we process it. We will not charge a fee for responding to this request unless your request is clearly unfounded, repetitive or excessive in which case we may charge a reasonable fee or decline to respond.
		We will, in most cases, reply within one month of the date of the request unless your request is complex or you have made a large number of requests in which case we will notify you of any delay and will in any event reply within 3 months.
		If you wish to make a Subject Access Request, please send the request to Results for People Ltd or email <u>ourteam@resultsforpeople.com</u> marked for the attention of the Data Compliance Officer.
4.	The right to rectification	You are entitled to have your information corrected if it's inaccurate or incomplete.
5.	The right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
6.	The right to restrict processing	You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
7.	The right to data portability	You have rights to obtain and reuse your personal information for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
8.	The right to lodge a complaint	We are committed to protecting your personal data but if for some reason you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<i>www.ico.org.uk</i>).
		We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

9. The right to withdraw consent	If you have given your consent to anything we do with your personal information, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal information with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal information for marketing purposes.
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We will act on requests and provide information free of charge but may charge a reasonable fee to cover our administrative costs of providing the information for excessive or repeated requests or further copies of the same information.

Please consider your request responsibly before submitting it. We'll respond within the legally period of 30 days.

How will we contact you?

We may contact you by phone, email or social media. If you prefer a particular contact means over another please let us know.

How can you contact us?

If you have any enquires you can contact us at: <u>ourteam@resultsforpeople.com</u> or by writing to us at:

Name: Fiona Legros - Data Protection Officer Results for People Ltd, Clarence House, Clarence Street, Leamington Spa, Warwickshire, CV31 2AD Tel: 07818 077560 Email: <u>ourteam@resultsforpeople.com</u>

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