

# **Privacy Notice**

#### Who are we?

Alexander Executive Search, is a public limited company under British law with registered office in 31 Grange Court Upper Park, Loughton, Essex, England, IG10 4QY, registered with the Company Trade Register of the United Kingdom under the number 11590034.

We are a recruitment and talent consulting business. We offer organizations a range of talent solutions including executive search, talent consulting, temporary and permanent recruitment, outplacement, managed solutions and interim management.

#### About this notice.

This privacy notice tells you what to expect when we collect personal information about you.

We are committed to ensuring your privacy is protected. Should you provide us with personal information by which you can be identified, then you can be assured that we will use that information only in accordance with this privacy notice. All of our employees and third parties who have access to or are involved in the processing of personal information respect the confidentiality of such personal information. We are a data controller for the purposes of data protection legislation.

### What is covered by this notice?

We collect the personal data of the following types of people to allow us to undertake our business:

- Jobseekers:
- Prospective and live client contacts:
- Participants at or of our Assessment/ Development Centres and / or of our online testing;
- Supplier contacts to support our services;
- Employees;
- Consultants, temporary workers





Visitors to our website.

We collect this information about you in order to carry out our core business and ancillary activities.

This privacy notice also covers:

- Security;
- Retention of your personal information;
- Your right to withdraw consent to our processing of your information;
- Your right to access information we hold about you.

#### Jobseekers: the information we collect and how we use it.

When you apply for a job through our website, other job boards, social networks, our registration process or advertising, we will gather personal information about you from your CV and our registration form and other sources (such as LinkedIn). This is in order to enable us to find you an appropriate job.

The information we gather includes, but is not limited to:

- Your name;
- Your contact details including your personal email address and telephone number;
- Your qualifications;
- References verifying your qualifications and experience;
- Your career history;
- Links to professional profiles available in the public domain, such as LinkedIn.

We hold and use this information in order to:

- Assist you in finding an appropriate job;
- Communicate with you regarding job opportunities and the progress of any applications you make;
- To provide your details to appropriate prospective employers. We will only share your information with named prospective employers with your permission;
- Provide you with job alerts relating to roles we think you might be interested in:
- Provide you with help and advice to assist in your job search;
- Provide you with information about general trends in the world of work;





- Seek your feedback on our services;
- Fulfil our obligations to our clients;
- Provide you with insights and advice to assist in your development;
- Provide insights gathered on you to our clients based on our tools and methodologies.

We may also gather information about you as part of our research to support our clients' resourcing needs. We obtain such information from sources such as LinkedIn, job board websites, online CV libraries, your business card and personal recommendations. In the event that we gather data about you, we will inform you of the fact that we hold personal data about you by sending you this privacy notice within 30 days of gathering the data.

You have the right to amend your communications preferences and/or personal profile at any time.

We may share your personal information with the following:

- Other Alexander Executive Search offices, including those outside the European Union (EU) and the European Economic Area (EEA);
- Franchises & Partners
- Trusted third parties who provide functions on our behalf, such as reference, qualification and criminal record checking services, psychometric evaluations, skills testing and payroll services. These third parties are required to comply with our stringent undertakings relating to security and confidentiality;
- Trusted third parties who provide us with research and emailing services.
   These third parties are required to comply with our stringent undertakings relating to security and confidentiality;
- Clients for the purpose of introducing candidates to them;
- Clients, business partners, suppliers and sub-contractors for the performance and compliance obligations of any contract we enter into with them or you;
- Subcontractors:
- Credit reference agencies, our insurance broker, compliance partners and other sub-contractors for the purpose of assessing your suitability for a role where this is a condition of us entering into a contract with you;
- Regulatory or law enforcement agencies, when required by law to do so.

We do not share your personal information with third parties who wish to use it for marketing purposes.





We do undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision making process.

### Our Talent Management Solutions.

Our legitimate interests in processing personal data enables our global Talent Solutions teams to provide their specialist assessment, leadership and organisational development services in order to:

- Fulfil our obligations to our clients;
- Assess you as part of any assessment, development centre or on line testing (commissioned by your employer/prospective employer), that you have participated in;
- Provide you with insights and advice to assist in your development;
- Provide insights gathered on you to our clients based on our tools and methodologies.

Our Reports are valid and beneficial to you for a period of two years from the date of issue. We therefore only retain them for a period of two years plus a short grace period of 3 months (2 Year 3 months).

### Employers: the information we collect and how we use it.

When you ask us to work with you we will record information about you, including but not limited to:

- Your name;
- Your job title;
- Your business contact information including your business email address;
- Your organisation.

We hold and use this information in order to:

- Provide the service you have asked us to provide;
- Provide you with reports on the work we are undertaking on your behalf;
- Advise you of relevant services and products;
- Provide you with information about general trends in the world of work;
- Seek your feedback on our services.

We may share your personal information with the following:





- Job applicants whom you invite to interview or make an offer to:
- Other Morgan Philips Group offices, including those outside the European Union (EU) and the European Economic Area (EEA), in order to provide services to you;
- Trusted third parties who provide us with research and emailing services.
   These third parties are required to comply with our stringent undertakings relating to security and confidentiality;
- Regulatory or law enforcement agencies, when required by law to do so.

The lawful basis for the third party processing will include:

- Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- Satisfaction of their contractual obligations to us as our data processor:
- For the purpose of a contract in place or in contemplation;
- To fulfil their legal obligations.

### Legal basis for the processing of personal data.

Our legal basis for the processing of personal data is our legitimate business interests, described below. We may also rely on contract, legal obligation and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation if we are legally required to hold information on to you to fulfil our legal obligations.

We will in some circumstances rely on consent for particular uses of your data and you will be asked for your express consent, if legally required. Examples of when consent may be the lawful basis for processing include permission to introduce you to a client (if you are a candidate). Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.





## Our legitimate business interests.

Our legitimate interests in collecting and retaining your personal data is as follows:

- As a recruitment business and recruitment agency we introduce candidates to clients for permanent employment, temporary worker placements or independent professional contracts;
- In order to support our candidates' career aspirations and our clients' resourcing needs we require a database of candidate and client personal data containing historical information as well as current resourcing requirements;
- To maintain, expand and develop our business we need to record the personal data of prospective candidates, client contacts, including our Talent Management client contacts and candidates;
- To enable us to provide our Talent Management services to both Clients and individuals;
- To deliver our ancillary services.

#### Visitors to our website.

We use Google Analytics and cookies to gather general information about visitors to our websites in order to better understand how our websites are used. We may share this general information with trusted third parties so they too may understand how our websites are used.

If we hold an email address for you, we may occasionally use cookies to gather information about your personal use of our websites. This is in order to provide you with a tailored service.

You may find further information about our use of cookies.

Our websites may contain links to external websites operated by other organisations. Those organisations may collect personal information from visitors to their site. We cannot guarantee the content or privacy practices of any external websites and does not accept responsibility for those websites.

### Security.

We are committed to protecting the security of your personal information. We use a variety of measures, including but not limited to, firewalls, antivirus and SSL encryption in order to protect your personal information from:

Unauthorised access:





- Improper use or disclosure;
- Unauthorised modification or alteration;
- Unlawful destruction or accidental loss.

### Where we store and process your personal data.

The data that we collect from you may be transferred to, and/or stored at, a destination outside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, our recruitment services and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted [using SSL technology]. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

### Retention of your personal information.

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests and that you are happy for us to do so. Accordingly, we have a data retention policy and run data routines to remove data that we no longer have a legitimate business interest in maintaining.

We do the following to try to ensure our data is accurate:

- Our website enables you to manage your data and to review whether the details we hold about you are accurate;
- Prior to making an introduction we check that we have accurate information about you;
- We keep in touch with you so you can let us know of changes to your personal data.

We segregate our data so that we keep different types of data for different time periods. The criteria we use to determine whether we should retain your personal data includes:





- The nature of the personal data;
- Its perceived accuracy;
- Our legal obligations;
- Whether an interview or placement has been arranged; and
- Our recruitment expertise and knowledge of the industry by country, sector and job role.

•

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

For your information, Pseudonymised Data is created by taking identifying fields within a database and replacing them with artificial identifiers, or pseudonyms.

Our current retention policy is available upon request on <a href="mailto:info@aesrecrutiment.com">info@aesrecrutiment.com</a>

### Your rights.

You have the following rights:

- Request correction of the personal information that we hold about you. This
  enables you to have any incomplete or inaccurate information we hold about
  you to be corrected;
- Request erasure of your personal information. This enables you to ask us to
  delete or remove personal information where there is no good reason for us
  continuing to process it. You also have the right to ask us to delete or remove
  your personal information where you have exercised your right to object to
  processing (see below);
- If you ask us to delete the information we hold on you we will delete all
  information with the exception of your email address, first name and last
  name. This will enable us to record that you have withdrawn consent. In
  addition, where required by law, we may retain certain personal information
  about you to fulfil our legal obligations;
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is some particular situation which makes you want to object to processing on this ground;
- Amend your communication preferences. You can tell us and update the type of information you would like to receive from us;
- Request the restriction of processing of your personal information. This
  enables you to ask us to suspend the processing of personal information
  about you, for example if you want to establish its accuracy or the reason for
  processing it;
- Request the transfer of your personal information to another party in certain formats, if practicable;





Make a complaint to a supervisory body.

The above rights may be exercised by contacting us on <a href="mailto:info@aesrecrutiment.com">info@aesrecrutiment.com</a>

### Your right to access information we hold about you.

You have the right to access the information we hold about you. Where we are legally permitted to do so, we may refuse your request and will provide you with our reasons for doing so. You may request to access the information we hold about you by email <a href="mailto:info@aesrecrutiment.com">info@aesrecrutiment.com</a>

### Changes to our privacy notice.

Any changes we make to our privacy notice in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy notice.

#### Contact us.

You may contact us about any questions you have in respect of this privacy notice at info@aesrecrutiment.com

