

FOLLETT PARKER

Privacy Policy

Who are we?

Follett Parker Ltd (2 Frederick Street, London, WC1X 0ND (020 8064 0682)). We provide executive search services to clients looking to recruit personnel for their businesses.

What does this Policy cover?

We take your personal data seriously at Follett Parker Ltd. This policy:

- sets out the types of personal data that we collect about you;
- explains how and why we collect and use your personal data;
- explains for how long we keep your personal data;
- explains when, why and with whom we will share your personal data;
- sets out the legal basis we have for using your personal data;
- explains the effect of refusing to provide the personal data requested;
- explains the different rights and choices you have when it comes to your personal data;

and

- explains how we may contact you and how you can contact us.

For the purposes of this policy:

1. Data protection laws means all applicable laws relating to the processing of Personal Data, including, for the period during which it is in force, the General Data Protection Regulation (Regulation (EU) 2016/679).
2. Data subject means the individual to whom the personal data relates.
3. Personal data means any information that relates to an individual who can be identified from that information.
4. Processing means any use that is made of data, including collecting, storing, amending, disclosing, or destroying it.
5. Special categories of personal data means information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric data.

What personal data do we collect about you?

We collect the information necessary to be able to find available opportunities and further information needed to assess your eligibility through the different stages of

recruitment. This information includes CVs, contact details, identification documents, educational records, work history, employment and references.

We only collect and process sensitive personal data from you – for example, on ethnic or racial origin – where you have given your explicit consent.

From where do we collect personal data about you?

We may collect personal data about you from:

- **You directly.** This is information you provide while searching for a new opportunity and/ or during a search assignment.
- **An agent/ third party acting on your behalf.**
- **Through publicly available sources.** We use, among others :
 - LinkedIn; Boardex; Factiva, Google and Companies House.
- **By Reference or word of mouth.** For example, you may be recommended by a friend, a former employer, a colleague or even a present employer.

If you are listed as a referee, we will obtain your information from the candidate themselves, or one of the third parties listed above.

How and why we use your personal data?

We use your personal data to match your skills, experience and education with an existing search mandate. We will initially collect basic information on you such as contact details, professional experience and then pass this on to the client. If you are chosen by the client and go through to the short list stage, we will then collect more information from you at the interview (for example, motivations, achievements, personal circumstances) for our client to assess your suitability.

We may also use your personal data to invite you to events run by Follett Parker Ltd. We do not sell your personal data to third parties, and we do not share it except as necessary to provide our services. We may need to share your information with our clients for them to assess your suitability, and some of our service providers (for instance, our IT provider) may store or otherwise use your information on our instructions (in which case we will have a contract in place with them to protect your information).

If you are a referee, we use your information to contact you about a candidate and obtain a reference on the individual.

How long do we keep your personal data for?

Candidate and referee data: 7 Years;

Client contact details: 7 years.

With whom do we share your personal data?

We share your personal data as necessary for our legitimate interests in finding and assessing candidates for roles for clients.

What legal basis do we have for using your information?

For prospective candidates, referees and clients, our processing is necessary for our legitimate interests in that we need the information in order to be able to assess suitability for potential roles, to find potential candidates and to contact clients and referees. We carry out a 'balancing test' to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests, before we go ahead with such processing.

If you are shortlisted as a candidate then this may involve the processing of more detailed personal data including sensitive data such as health information that you or others provide about you. In that case, we always ask for your consent before undertaking such processing.

We will process client data (including information about members of staff at that client) necessary for our legitimate interests in fulfilling our contract with the client.

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 data necessary, or withdraw your consent for the processing of your personal data, we will not be able to match you with potential search mandates. At your request, you will be removed from the database and will not be contacted by us again.

Do we make automated decisions concerning you?

No, we do not carry out automated profiling.

Do we use Cookies to collect personal data on you?

No, we do not.

Do we transfer your data outside the EEA?

We may transfer your personal data to clients and partners in countries outside the EEA. In particular, some businesses to which we may provide candidate information will often be international organisations. The privacy laws that apply may be different from those in your home country. Where we transfer personal data outside of the EEA, we take steps to safeguard that information, including by ensuring that the European Commission considers that they have adequate data protection in place, or by putting in place model clauses with that recipient approved by the EU or a data protection authority.

What rights do you have in relation to the data we hold on you?

By law, you have a number of rights when it comes to your personal data. Further information can be obtained from the Information Commissioner's Office (ICO).

Rights

1. *The right to be informed*

What does this mean?

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 are providing you with the information in this Policy.

2. *The right of access*

You have the right to obtain access to your information (if we are processing it), and certain other information (similar to that provided in this Privacy Policy).

3. *The right to rectification*

You are entitled to have your information corrected if it is inaccurate or incomplete.

4. *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 is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.

5. *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.

6. *The right to data portability*

You have rights to obtain and reuse your personal data 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.

7. *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).

8. *The right to lodge a complaint*

You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.

9. *The right to withdraw consent*

If you have given your consent to anything we do with your personal data, 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 data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

We usually 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: baseless or excessive/ repeated requests, or further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

Please consider your request responsibly before submitting it. We will respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will come back to you and let you know.

How will we contact you?

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

How can you contact us?

If you are unhappy with how we have handled your information, or have further questions on the processing of your personal data, please contact Sandra Hatugari at Sandrahatugari@folletparker.com

Thank you.