



## Who we are

Definitive Consulting Limited and all its subsidiary companies including but not limited to:

Definitive Consulting PTY Limited, Definitive Consulting (HK) Limited, Definitive Consulting (SG) PTE, Definitive Consulting FZ LLE and DC Initiatives LLP; hereafter referred to as Definitive Consulting. The head office is located at 85 Gresham Street, London, EC2V 7NQ, +44 207 0780 765.

Definitive Consulting is a leading global executive search specialist and trusted partner to professional services firms worldwide.

Our specialist practice groups work closely with a select group of leading firms in the Advisory, Assurance, Consulting, Legal and Taxation sectors.

## This policy sets out the types of personal data that we collect and explains:

- How and why we collect, store, process and use your personal data
- How long we keep your personal data for
- When, why and with whom we may share your personal data
- The legal basis on which we may collect, store and process your personal data
- The implications associated with refusing to provide us with your personal data
- The different rights and choices you have when it comes to your personal data
- How we may contact you and how you can contact us.

We collect the information we need to find employment opportunities on your behalf, and to assess your eligibility through the different stages of the recruitment cycle.

This information includes CVs, identification documents, educational records, work history, employment, business plans and references.

We may also collect sensitive personal data about you, in the form of gender and race. We only collect sensitive personal data where absolutely necessary. We only collect sensitive personal data from you, and further process this data, where you have given your explicit consent.

If you are receiving coaching from us, we will also process any additional information that you choose to provide to us during the course of the coaching.

# The following are the different sources we may collect personal data about you from:

- Directly from you. This is information you provide while searching for a new employment opportunity and/or during the different recruitment stages, or during coaching
- From an agent/third party acting on your behalf,
   e.g. an interim management company.
- Through publicly available sources, such as:
  - Social media, including LinkedIn
  - Company websites
  - Articles and marketing literature
  - By reference or word of mouth. For example, you may be recommended by a friend, a former employer, a former colleague or even a present employer.

We use your personal data to match your skills, experience and education with those required by a potential employer.

We will initially collect basic information on you such as contact details, job role and experience and then pass this on to the client in search of personnel.

If you are chosen by the client and go through to the next stage we will then collect more information from you at the interview (or equivalent) stage and onwards in that manner.

If you are receiving coaching from us, we use your personal data in order to understand more about you and to assist you with understanding your skills and areas for improvement for future opportunities and options.

### We retain your information as follows:

- Candidate data: Two years from the last point of contact unless the candidate says that they do not want to be contacted, in which case this information is deleted (unnecessary and outdated data will be deleted before this)
- Interim manager data: Two years from the last point of contact unless the interim manager says that they do not want to be contacted, in which case this information is deleted (unnecessary and outdated data will be deleted before this)
- Client contact details: Two years after the end of the service contract from the last point of contact subject to us having had no further contact with them during this time (unnecessary and outdated data will be deleted before this)
- Coached candidate data: Two years after the coaching has finished (unnecessary and outdated data will be deleted before this).

Your personal data may be shared with any client organisation initiating a search for personnel.

Publicly available data may be shared with any client organisation instructing us on a search including law firms, accountancy firms and management consultancies around the world.

We may also conduct checks to verify the information you have provided and, where we do this, we may share your information with the clients mentioned above.

We may also share your data within our group companies, i.e. other Definitive Consulting international offices.

#### What legal basis do we have for using your information?

For prospective candidates, interim managers, referees and clients, our processing is necessary for our legitimate business interests

That is, we need the information in order 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.

We keep a record of these balancing tests. You have a right to and can find out more about the information in these balancing tests by contacting us using the details below.

If you are shortlisted as a candidate or if you are coached by us, then this may involve processing more detailed personal data including sensitive data such as health information that you or others provide about you. In those cases we always ask for consent before undertaking such processing.

In the case of client organisations, we may also store, process and use data, such as contact details, in order to fulfil programmes of work we have been contracted to undertake.

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 may not be able to match you with available job opportunities as we will need to delete your data from our records.

Do we make automated decisions concerning you?

No, we do not carry out automated profiling.

Our website does not use cookies to collect or store information about you or your web browsing.

#### Do we use Google Analytics?

We use Google Analytics, which collects anonymous data about our website visitors, including:

- · What website they arrived from
- How long they stay on our site for
- Which pages of our site they visit and for how long
- · What kind of computer they are using.

No personal identifiable data is collected and no data is directly stored by us. All of this falls within the bounds of the Google Analytics Terms of Service.

To better match your profile with career opportunities we may pass your personal data to clients and partners in countries outside the EEA.

These countries privacy laws may be different from those in your home country.

Where we transfer data to a country which has not been deemed to provide adequate data protection standards we always have security measures and approved model clauses in place to protect your personal data.

At present we transfer personal data to the following countries outside the EEA:

- Australia
- Singapore
- Hong Kong
- United Arab Emirates

To find out more about how we safeguard your information related to international transfers contact us on GDPR@definitive-consulting.com.

# Your rights in relation to personal data we store

By law, you have a number of rights when it comes to your personal data.

Further information and advice about your rights can be obtained from the data protection regulator in your country. You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights.

We're providing this information in this policy.

The right of access

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

This is so you're aware and can check that we're using your information in accordance with data protection law.

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

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.

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.

The right to data portability

You have the right to obtain and reuse your personal data for your own purposes.

For example, if you decide to switch to a different search firm, you must be able to move, copy or transfer your information between our IT systems and theirs safely, easily and securely, without affecting its usability. You have the right to object to certain types of processing (i.e. if you no longer want to be contacted regarding potential career opportunities).

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.

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.

However, we 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 we will contact you

How you can contact us

We may contact you by phone, email or via social media.

If you prefer a particular contact method please let us know.

If you are unhappy with how we've handled your information, or have further questions on the processing of your personal data, please get in touch.

You can write to us:

Definitive Consulting 85 Gresham Street London EC2V 7NQ UK

Email us:

GDPR@definitive-consulting.com

Or call us:

+44 (0) 207 0780 765



Advisory | Audit & Assurance | Consulting | Legal | Taxation

www.definitive-consulting.com