

Upton & Brown Limited

EXECUTIVE SEARCH

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Privacy Policy

Upton & Brown Ltd (the firm) is a leading executive search firm. We take data privacy seriously and maintain a Privacy Policy ("Policy") to describe how we will use information on individuals for our Legitimate Interest in providing executive search and job search services to clients and candidates.

This Policy covers all data collected through executive search or market mapping exercises for clients and job search for candidates.

This Policy is effective from 01 May 2018. We reserve the right to change, modify, add or remove sections of this Policy at any time. We will inform you if or when we make material changes by indicating on the Policy the date it was last updated or otherwise. When you visit the website or engage with us in connection with our executive search and job search services, you are accepting the current version of this Policy as posted on this site at that time.

DATA COLLECTED VIA THIS WEBSITE

If you visit our website or contact us via our website, please note:

- When you send a message to us or otherwise send us data via our website or embedded link, we can reasonably and fairly collect and use your name, email address and any other information that you forward to us.
- We use the data we collect from our website for the following general purposes including: to respond to the request that you sent us, such as your request for information on our services or your job search.
- We do not sell or rent your information to third parties and do not share your personally identifiable information with others, except: we freely share your information within the firm; we may share your information as required by law or in the interest of protecting or exercising our or others' legal rights or in the legitimate interest of the firm in providing executive search or job search services.
- Communications over the internet are not fully secure or without error. We take appropriate and reasonable measures to protect your personal information from loss, misuse, unauthorised access, disclosure, alteration and destruction.

DATA COLLECTED IN THE PROVISION OF OUR SERVICES

If you are engaged with us as a potential candidate, client or otherwise in connection with our delivery of executive search and job search services, please note:

- In our Legitimate Interest of providing our clients executive search and job search services and communication and collaboration among employees of the firm, the firm reasonably and fairly collects and processes information relating to individuals "Personal Information". This would usually include information in a standard curriculum vitae (e.g., name, address, phone number, email address, employment history, qualifications, languages and other skills). It may also include, without limitation: age, nationality, compensation details, a record of our contact history with you and comments from third

parties. Our records derive from information collected directly from you, publicly available sources and third parties, observed by tracking publicly available information and occasionally by inferring through combining these data sets.

- We will use this Personal Information to contact you about executive search conducted for our clients that involve the identification, evaluation and/or selection of qualified candidates or job search for candidates. We, or our client, may also provide Personal Information to applicable regulators. In addition, we may also collect demographic information about you to assist our clients in addressing their diversity needs. Depending on how far your candidacy progresses, we may verify the accuracy of Personal Information regarding academic and professional qualifications, skills and credentials, work performance, and check or confirm references. We understand the sensitive nature of this endeavour, and we will not speak to your current employer without your express permission, but if there is any other individual we should not contact, please inform the search consultant with whom you are working or the Privacy Officer at the email address below.
- Your information is held on our database, which is secure and accessible only to our employees. Your information may also be disclosed on a confidential basis to clients who will also need to process your information for the purposes we have described in this Policy; appropriate third parties when required by law; and service providers, but only to the extent necessary to perform work directed by us (e.g. data hosting). Personal Information is retained until the purposes have been fulfilled or otherwise required by law.
- The recipients of Personal Information (and the servers that hold your information) may be located in jurisdictions outside your home jurisdiction that may have data privacy laws that do not provide the same level of protection as those in your home jurisdiction or the European Economic Area. We are committed to protecting your information and will take appropriate technical and organisational measures to secure your Personal Information. Please be assured that we do not sell your information to third parties or use the information for purposes that are incompatible with those described in this policy.
- You have the right to withdraw your consent for the firm to process your data at any time or to access and request that we rectify or remove your record from our systems. When asked to remove a record from our database, the firm will only retain minimal Personal Information to prevent future contact, to keep a record of the information disclosed to our clients and to preserve the firm's interests in accordance with any applicable legal requirements. If you withdraw your consent to our Policy you will not be able to be a part of an executive search or job search project. You may exercise your rights by contacting the firm. The firm will comply with any lawful request and you also have the right to make complaint to the Information Commissioner's Office (ICO). The Information Commissioner's Office (ICO) is the firm's lead data protection supervisory authority.

CONTACT US

Please feel free to contact us with any comments, questions, complaints or suggestions you might have regarding the information or practices described in this Policy. You may contact us by sending a message to `contact@uptonbrown.com`, marked FAO Privacy Officer.