



EXECUTIVES ONLINE PRIVACY STATEMENT

Who are we?

Executives Online Athenia House, Andover Road, Winchester SO23 7BS. We provide executive search and interim services to clients looking to hire senior personnel into their businesses. For the purposes further developed in this Privacy Statement, we act as a data controller.

What does the Privacy Statement cover?

We at Executives Online take your personal data seriously.

This Privacy Statement:

- sets out the types of personal data that we collect about you
- explains how and why we collect and use your personal data
- explains how long we keep your personal data for
- explains when, why and how 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.

What personal data do we collect about you

- For candidates we collect personal data necessary to help source suitable opportunities or to place you with the client if you have applied for a specific role. The personal data we hold initially includes contact details, job role, experience and CV.
- For current clients we collect personal data necessary to communicate with you about the agreed recruitment programme or to keep in contact with you. The personal data we hold includes contact details, company information and role.
- As a potential client who we feel may benefit from EO's recruitment services the personal data we hold includes contact details, company information and role.
- If you are receiving coaching services from us, we will also process any additional personal data that you choose to provide to us during the coaching.

The sources of where we collect your personal data

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

For candidates:

- **Directly from you.** this is personal data you provide when you register with Executives Online or while searching for a new opportunity and/or during the different recruitment stages, including placement if you receive coaching from us.
- **We may source personal data from an agent/third party acting on your behalf.** e.g. Interim Management Company.
- **Through publicly available sources.** We use the following public sources:
 - LinkedIn
 - Xing &
 - Other internet sites with publicly available personal data.
- **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.

For clients:

- **Directly from you:** this is personal data you provided to us when we contracted to work together or
- **Through publicly available sources.** We use the following public sources:
 - LinkedIn
 - Xing
 - Company registered information via national 'Companies House'
 - Company reports including Director registered information via services such as Dun & Bradstreet
 - Other internet sites with publicly available information.

How and why we collect your personal data

- For registered candidates: We process your personal data to match your skills and experience to the client's requirements. We hold the personal data you supply to us via our website. This personal data includes contact details, job role, experience and CV. We will contact you before passing your data onto the client. If you are selected by the client to go forward to the next stage, we may collect more personal data from you if required at this point.
- We may process your data to help you secure your next role. This would always be with written confirmation between us that you would like your details to be submitted to our client.
- For clients: we use your personal data to update you on the recruitment programme or keep in touch with you or to advise you on EO's services. We also use your personal data to contact you when we have a candidate who we feel may add value to your organisation.
- If you are receiving coaching from us, we use your personal data to understand more about you and assist you with understanding your skills, areas for improvement or future opportunities and options.
- As a placed Interim Manager by EO we use personal data to contact and make payments to your company and ensure compliance with legal requirements.

How long do we keep your personal for?

We keep your personal data in accordance as follows:

- **Candidate data:** We will store your personal data until you tell us you no longer want us to and as long as required by law. This will ensure that we keep you informed of roles that may be of interest to you. You will have access to your personal data via a portal which will allow you to amend or tell us that you don't want us to process your personal data. We will contact you every 5 years after your registration anniversary to confirm the personal data we hold on you is still relevant.
- **Interim Manager data:** We will store your personal data until you tell us you no longer want us to and as long as required by law. This will ensure that we keep you informed of roles that may be of interest to you. You will have access to your personal data via a portal which will allow you to amend or tell us that you don't want us to process your data. We will contact you every 5 years on your registration anniversary to confirm the personal data we hold on you is still relevant.

- Client contact details: We will store your personal data while we are working with you on a recruitment project or marketing our services to you and as long as required by law.
- We keep placed candidate personal data & client contract data for 10 years in line with legislation.

Who do we share your personal data with?

- As a candidate:
Your personal data may be shared with the client who initiates a search for personnel if you meet the requirements and you're interested in the role. We only share the data, personal to you and not already in the public domain, with third parties after we receive your agreement to do this. We may also conduct checks on you to verify the personal data you have provided and where we do this we may share your personal data with third party verification companies depending on the level of verification required by the client.
- As a client:
Your personal data will only be shared as part of the recruitment programme with potential candidates.

What legal basis do we have for using your personal data?

- For prospective candidates, interim managers, referees and clients, our processing is necessary for our legitimate interests in that we require the personal data to assess suitability for potential roles, secure potential candidates, contact clients, referees and to market our services.
- If you are shortlisted as a candidate or if you are coached by us, then this may involve the processing of more detailed personal data including sensitive data such as health data that you or others provide about you. In that case we always ask for your consent before undertaking such processing.

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

- For candidates: 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 or continue to work with you.
- For clients: we will be unable to communicate with you on recruitment projects or make you aware of EO's services.

Do we make automated decisions concerning you?

- We select candidates from our database based on the personal data you enter when you register with us. You have the right to amend this personal data at any time.
- We do not carry out automated profiling.
- We do not make automated decisions on client data

Do we use cookies to collect personal data on you?

To provide better service to you on our websites, we use cookies to collect your personal data when you browse. See our cookie policy [here](#) for more details.

Do we transfer your personal data outside the EEA?

To better match your employee profile with current opportunities we may transfer 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 personal 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. To find out more about how we safeguard your personal data as related to transfers contact us on communications@eoexecutives.com

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

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

Rights	What does this mean?
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. Therefore, we are providing you with the information in this Privacy Statement.
2. The right of access	You have the right to obtain access to your personal data (if we are processing it), and certain other personal data (like that provided in this Privacy Statement).
3. The right to rectification	You are entitled to have your personal data corrected if it's 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 personal data where there is no legal 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 personal data. When processing is restricted, we can still store your personal data, but may not use it further. We keep lists of people who have asked for further use of their personal data 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 personal data 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.

Please note that should you exercise your right to request that we erase data or cease any processing activity, we may retain a record of this request and the action taken in order to both evidence our compliance, and to take steps to minimise the prospect of any data being processed in the future should it be received again from a third party source.

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'll 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'll 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 have a preference on how you wish to be communicated with, please let us know.

How can you contact us?

If you are unhappy with how we've handled your information or have further questions on the processing of your personal data, contact communications@eoexecutives.com