

Privacy and Data Protection Policy

25 May 2018

Your privacy is important to us and we are committed to protecting your personal information. As part of this commitment, we are updating our Privacy Policy and the ways in which your personal information is treated to ensure that we meet the high standards of the new European data protection laws or General Data Protection Regulation (GDPR), effective 25 May 2018.

- 1) **The personal information we collect** We may collect personal information from you in the course of our business with you, including when you contact or request information from us, when you engage our services or as a result of your relationship with our staff and clients/advisers. We process personal information such as:
 - a) Your name, the company you work for, your title or role and your relationship to a person;
 - b) Contact information including postal address, email address and phone number(s)
 - c) Identification, personal and background information provided by you or collected as part of our business dealings with you, provided to us by or on behalf of our clients, or generated by us in the course of providing services to them
 - d) Technical information, such as information in relation to materials and communications we send to you electronically
 - e) Financial information including payment-related information
 - f) Information you provide ahead of attending meetings and events
 - g) Other information pertaining to you which you may provide to us
 - h) Information which is in the public domain about you.
 - i) Information which is provided about you by third party sources such as people we consult about excellent candidates for positions.
- 2) **How we obtain personal information**
 - a) We collect information from you as part of our business processes with you, including e-mail and letter communication, or when we deal directly with you at meetings, over the telephone, via video-conference services or Skype.
 - b) Sometimes we collect or receive information about you from other sources, such as public domain information, directories, conference proceedings and publicity, press and media reports and company websites.
 - c) We will try to keep the contact details we already hold for you accurate and up to date using sources in the public domain or information supplied to us by you or people who know you.
- 3) **The ways in which we use personal information**
 - a) We collect and process your personal information in various ways, sometimes through your submitting or your details by contacting us directly through our website but mostly through the provision of services by us. We then use that information:
 - i) To provide and improve our services to you and to our clients, including handling the personal information of others on behalf of our clients
 - ii) To provide information requested by you
 - b) To promote our services to you, including sending updates, publications and details of events.
 - c) To manage and administer our relationship with you and our clients
 - d) To fulfil our legal, regulatory and risk management obligations.
 - e) For other legitimate business purposes where appropriate consents have been given.
- 4) **Our website**
 - a) Our website uses Google Analytics, a web-based analytics tool that tracks and reports on the manner in which the website is used to help us to improve it. Google Analytics does this by placing small text files called 'cookies' on your device. The information that the cookies collect, such as the number of visitors to the site, the pages visited and the length of time spent on the site, is aggregated and therefore anonymous.

- b) You may refuse the use of cookies or withdraw your consent at any time by selecting the appropriate settings on your browser but please note that this may affect your use and experience of our website. By continuing to use our website without changing your privacy settings, you are agreeing to our use of cookies.

5) Meetings, events and seminars

- a) We'll collect and process personal information about you in relation to your attendance at our offices or at an event or seminar organised by Sciteb or our business partners. We'll only process and use special categories of personal information about dietary/access requirements to meet your needs and to meet any other legal or regulatory obligations we may have.
- b) We may share your information with IT and other service providers or business partners involved in organising or hosting the relevant event.

6) Our services

- a) We collect, create, edit, hold and use personal information while working with and in connection with the services we provide to our clients. We will process identification and background information as part of our business, recruitment, finance and administration processes, including reputational and financial checks. We will also process personal information provided to us by or on behalf of our clients for the purposes of the work we do for them. The information may be disclosed to third parties to the extent reasonably necessary in connection with that work.

7) The bases on which we use personal information:

- a) For legitimate business purposes
- b) Contracts to engage with an individual or company to provide consulting, recruitment or other services
- c) For the establishment, exercise or defence of legal claims or proceedings
- d) To comply with legal and regulatory obligations

8) Length of time we hold personal information

- a) Your personal information will be retained in accordance with applicable data protection laws and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and Sciteb's business purposes.

9) With whom we share personal information

- a) Any information that you provide to us may be shared with our clients to the extent necessary to provide them with our services in Special Thinking, Strategy and Search. It may also be processed for these purposes.
- b) We may also share your personal information with certain trusted third parties in accordance with contractual arrangements in place with them, including:
 - i) Our professional advisers and auditors
 - ii) Suppliers to whom we outsource certain support services such as translation, photocopying, and document review
 - iii) IT service providers
 - iv) Third parties engaged in the course of the services we provide to clients and with their prior consent, such as technology service providers like data room services
 - v) Third parties involved in hosting or organising events or seminars
- c) Where necessary, or for the reasons set out in this policy, personal information may also be shared with regulatory authorities, courts, tribunals, government agencies and law enforcement agencies. While it is unlikely, we may be required to disclose your information to comply with legal or regulatory requirements. We will use reasonable endeavours to notify you before we do this, unless we are legally restricted from doing so.
- d) We do not sell or make any personal information available to any third party, except with your prior permission, other than in the normal course of our provision of Executive (and non-Executive) Search and Strategy Consulting. For example:

- i) To avoid embarrassment, we usually submit information about *potential* candidates for NED roles to the client before we contact the potential candidate about the role, and only reach out to the candidate when the Client has expressed an interest.
- ii) This approach is also sometimes appropriate in the case of executive search when horizon scanning is needed.
- iii) In strategic engagements it may be necessary to provide reports for Clients about the management or key personnel in other companies which are of interest to them, and to compare the CVs and other accomplishments with people employed by our Clients.

10) Ways in which we protect personal information We use a variety of technical and organisational measures to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction consistent with applicable data protection laws.

11) The countries to which we may transfer personal information

- a) While providing our services we may need to transfer your personal information to locations outside the jurisdiction in which you provide it or where you are viewing this website. This may entail a transfer of your information from a location within the European Economic Area (the “EEA”) to outside the EEA, or from outside the EEA to a location within the EEA.
- b) The level of information protection in countries outside the EEA may be less than that offered within the EEA. Where this is the case, we will implement appropriate measures to ensure that your personal information remains protected and secure in accordance with applicable data protection laws. Where our third party service providers process personal data outside the EEA in the course of providing services to us, our written agreement with them will include appropriate measures, usually standard contractual clauses.

12) Your rights regarding your personal information

- a) As a ‘data subject’ you are entitled to request details of the information we hold about you and how we process it. You may also have a right in accordance with applicable data protection law to have it rectified or deleted, to restrict our processing of that information, to stop unauthorised transfers of your personal information to a third party and, in some circumstances, to have personal information relating to you transferred to another organisation. You may also have the right to lodge a complaint in relation to Sciteb’s processing of your personal information with a local supervisory authority.
- b) If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations. This will naturally not prevent us from using information about you which is in the public domain for legitimate business purposes.
- c) Your objection (or withdrawal of any previously given consent) could mean that we are unable to perform the actions necessary to achieve the purposes set out above (see ‘How we use your personal information’) or that you may not be able to make use of the services and products offered by us. Please note that even after you have chosen to withdraw your consent we may be able to continue to process your personal information to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

13) We must do our reasonable best to ensure that your personal information is accurate and up to date. Therefore, please advise us of any changes to your information by contacting us using the [Contact Us section on our website](#).