

Turner Marke International Limited

Privacy Policy

Turner Marke International Limited ("**we**", "**us**" or "**our**") takes its responsibility to safeguard personal data very seriously and has developed this EU GDPR Privacy Notice (last reviewed and updated January 2021) to provide additional information about how we handle personal information that is subject to the GDPR when we are the controller of that information. In this GDPR Privacy Notice, we use the term "GDPR" to include the EU General Data Protection Regulation, as well as associated national laws.

This GDPR Privacy Notice explains how we handle the personal information we collect from individuals offline (we do not collect any personal information via our website save for cookies), the personal information we collect when individuals engage with us or use our products or services (**our "Services"**) and the personal information we collect about individuals as a result of providing the Services to third parties, whenever personal information is subject to the GDPR.

Purpose of this privacy notice

This GDPR Privacy Notice explains how we process personal information that is subject to EU data protection laws, and also sets out your rights related to our processing of such personal information.

Who this policy applies to

We provide executive search and recruitment, assessment and consultancy services to a range of clients throughout the world. This policy applies to you whether you are a candidate for one of our clients, an individual we are assessing as an employee of one of our clients, a client or whether you are a source or a referee in respect of a candidate or an employee of one of our clients.

For the purposes of this policy:

1. **candidate(s)** means an individual who is a candidate, applicant, potential candidate, employee of a client;
2. **client(s)** means any, business, firm, organisation, government body or individual that mandates us to perform any of our services;
3. **a referee** is a person who provides a personal or work reference in respect of a candidate and;
4. **a source** is a person who provides us with information or intelligence about a candidate.

WHAT IS PERSONAL DATA AND PROCESSING – DEFINITIONS

"Personal Data" consists of any information that relates to you and/or information from which you can be identified, directly or indirectly. For example, information which identifies you may consist of your name, address, telephone number, employment history, salary information, education history, professional experience and resumé or an online identifier (e.g. cookie identifiers and your IP address). When we combine other information (i.e. information that does not, on its own, identify you) with Personal Data, we treat the combined information as Personal Data.

We do not collect **"Sensitive Personal Data"** from you (or any other source) when providing our services, unless legally required to do so. Sensitive personal data includes data relating to race or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health, sexual life, or criminal record.

"Processing" means any operation or set of operations performed upon Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. This Policy applies to Personal Data collected by us in connection with our services offline (we do not collect any personal data via our website).

PERSONAL DATA WE MAY COLLECT FROM YOU

Turner Marke International Limited is an executive search and recruitment consultancy company providing search, due diligence and consultancy services. Our clients expect that we identify the best individuals to fill roles within their organisations. The nature of our work means we are required to process personal data quickly, confidentially and often without reference to the data subject. Accordingly, we process such data in accordance with any applicable data protection laws, regularly using our legitimate interest where it is not possible or feasible to speak directly with the data subject.

We collect Personal Data from candidates for senior positions for the purposes of carrying out services on behalf of our clients, where we have a legitimate interest or other legal basis for processing such information.

Personal Data you give us directly

You may provide us with your Personal Data directly when you correspond with us by telephone, e-mail or otherwise. The information you give us may include your name, address, e-mail address and telephone number, job title, company name, CV or other personal details that may be included in any enquiry you make.

Your career and other ways we may collect your Personal Data

In order to provide our services as a search company, we collect, process, use and retain Personal Data as part of the executive search process. We may get in touch with you to assess your professional experience or retrieve extra information which will be important to your qualification for a senior role. This might include your contact details, the information in your CV, compensation, referees, and details for background checks, for example employment or education history. It is our duty to keep your Personal Data up to date and we appreciate your assistance with this, by keeping us informed of developments in your career.

We may also compile data from searches of your professional information publicly available via social media platforms such as LinkedIn, Google, Twitter, company websites, the press or other publications and data on your suitability for senior executive opportunities as part of our assessment of your professional profile. Any such relevant information will be deemed as "**Candidate Personal Data**" and processed alongside any Personal Data that you have submitted. You are of course free to choose which, if any, Candidate Personal Data you provide; however, generally the more information you make available to us (but please note that we do not collect any Sensitive Personal Data as set out above), the better we are able to assess you as a potential candidate in an executive search process for our clients.

HOW WE USE YOUR PERSONAL DATA

How we process information

Your Personal Data may be processed for the purpose of providing our Services as defined in this Policy, in some of the ways listed below with your consent:

Client

We may collect, process and retain your Personal Data on the terms set out in this Policy and in our Terms and Conditions agreed with you and share your Personal Data on a confidential basis where required for the purpose of providing our Service to you and for administrative, billing and other business purposes.

Potential Candidate

As a Potential Candidate we may include your Personal Data as part of an executive search or recruitment process on behalf of our clients including to enable us to fulfil our obligations under any

contract (such as our Terms and Conditions for executive search assignments). We may also evaluate your qualification for a role and verify your Candidate Personal Data for the search process and in order to manage our database.

Other

We may also use Personal Data for the following:

1. **Legal obligations** – to comply with our legal obligations, arising under applicable law;
2. **Client support** – to provide client support services, or to deal with any other support queries you may have;
3. **Analysis purposes** – for assessment and analysis of our market, clients and services (including asking you for your opinions on services and carrying out client surveys);
4. **Service improvement** – to develop and improve new and existing services, recommendations, advertisements and other communications and learn more about your preferences;
5. **Crime prevention** – for the prevention or detection of fraud or crime;
6. **Business purposes** – for business monitoring and internal record keeping. We may use your Personal Data for our business purposes, such as audits, internal communication regarding candidates and clients, determining the effectiveness of our promotional activities, administering our services, maintaining and securing our infrastructure, and for procurement and financial transactions;

TRANSFER OF PERSONAL DATA OVERSEAS

We are an international executive search and recruitment company. To better match your employee profile with current opportunities, for the purposes of business development, systems development and testing, where required in order for our suppliers to provide a service to us or as necessary in order to perform our contract with you, your Personal Data may be transferred to clients and partners in countries across international borders.

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 have security measures and approved contracts in place to protect your personal data. For example, if the transfer is from the European Economic Area (EEA) to a country outside the EEA which has not been deemed to provide adequate data protection standards by the European Commission, we will use specific contracts approved by the European Commission which give personal data the same protection it has in Europe and where data is transferred from other jurisdictions, if appropriate, we may use local approved equivalents.

DATA RETENTION

We will retain your Personal Data for the period necessary to fulfil the purposes for which it was collected as outlined in this Policy unless a longer retention period is required by law. Where you provide us with your Personal Data for the purposes of being considered for our executive search and other services, it is in Turner Marke International Limited's legitimate interest to retain such Personal Data, so we can notify you of and consider you for future opportunities which may be of interest to you.

If you no longer wish us to hold your Personal Data on our system and for requests for access, or corrections, please email us at lisa@turnermarke.com

TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?

We may disclose your Personal Data to the following entities:

1. **Turner Marke International Limited** – Your Personal Data will be accessible to Turner Marke International Limited employees.
2. **Our Clients** – With discretion and confidentially we may disclose excerpts of your Candidate Personal Data where we are engaged to provide our services to a client for the purposes of our

executive search assignments, recruitment services or our Services. We will only disclose what is necessary for the purpose and will seek to obtain your permission to disclose your Candidate Personal Data in greater detail and when putting you forward on an executive search.

3. **Third Party referees** – With discretion we may disclose excerpts of your Candidate Data to other organisations or individuals (e.g. former colleagues or other individuals within your industry) for reference or recommendation purposes or where we need to conduct other background checks as part of the executive search process. We will only disclose what is necessary for that purpose.
4. **Service providers** – We use third party service providers to help us to administer certain activities and services on our behalf, such as IT services, management of our database servers and hosted software, CV verification, and background checks. We may share your Personal Data with such third party service providers solely for the purpose of enabling them to perform such services on our behalf and they will operate only in accordance with our instructions and will be subject to applicable Data Protection Legislation.
5. **Third parties when required by law or to protect our services** – We will disclose your Personal Data to comply with Data Protection Legislation and applicable laws or respond to valid legal process, including from law enforcement or other government agencies; to protect our clients and candidates (e.g. to prevent spam or attempts to defraud users of our services); to operate and maintain the security of our Services (e.g. to prevent or stop an attack on our systems or networks); or to protect the rights or property of Turner Marke International Limited, including enforcing any terms or agreements governing the provision of our services.
6. **Other parties with your consent or at your direction** – We may share Candidate Data about you with third parties when you consent to or request such sharing.

WHERE WE STORE YOUR PERSONAL DATA

Your Personal Data will be stored in our confidential encrypted database, accessible only by Turner Marke International Limited or by third party service providers acting on our behalf.

We will take all reasonable steps necessary to ensure that your Personal Data is kept secure and treated in accordance with this Policy and the requirements of applicable law wherever the data is located.

WHAT DO WE DO TO KEEP YOUR PERSONAL DATA SECURE?

We use the appropriate physical and technical measures created to safeguard your Personal Data. Once we have received your Personal Data, we use strict procedures to prevent illegal processing and we have security features to try to prevent unauthorised access, including firewall, anti-virus software and encryption. Both physical and technical safeguarding measures are regularly reviewed and updated. We ensure that our staff have regular training to support the above.

COOKIES

A cookie is a small file placed on your computer by a website to store information. When you return to the site later, your web browser sends back the cookies that belong to the site. We use cookies that explain to us how you browse our website, this is to help us improve and deliver a more personalised service to our customers.

Some of the cookies we use are essential for the site to operate. Cookies are widely used in order to make websites work, or work more efficiently, as well as to provide information to us about how our customers browse through our website.

THIRD PARTY SITES

Please note that third parties (including, for example providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

Our site may, from time to time, contain links to and from other websites that are not operated by us. These linked sites are not under our control and as such, we are not responsible for the privacy practices or the content of any linked websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and any Personal Data collected by the Third Party's website will be controlled by the privacy notice of that third party and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Data to these websites.

ACCESSING YOUR PERSONAL DATA AND OTHER RIGHTS YOU HAVE

Under Data Protection Legislation, you have certain rights which include the right to correct, restrict/block, rectify, object, access and revoke your consent to any applicable aspect of this Policy or ask us to delete any of your Personal Data that we hold. If you wish to enforce any of your rights, then please contact us by email at lisa@turnermarke.com. For further concerns in relation to your rights you may contact the Information Commissioner's Office.

We will collect, store and process your Candidate Personal Data in accordance with your rights under any applicable data protection laws. For further information about your rights, see below:

Subject Access Request

You have the right to request details of the Personal Data which we hold about you and copies of such Personal Data.

Right to Withdraw Consent

Where you have consented to our processing of your Personal Data, you have the right to withdraw such consent at any time. In the event you wish to withdraw your consent to processing, please contact us using the details provided in the 'Contact' section below.

Rectification

We want to ensure that Personal Data that we hold about you is accurate and up-to-date. If you think that any information we have about you is incorrect or incomplete, please let us know. We will use our best endeavours and have policies and procedures in place to try to ensure that we can rectify or update any incorrect or inaccurate Personal Data about you.

Erasure ("right to be forgotten")

You have the right to have your Personal Data 'erased' in certain specified situations.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Policy. The "last updated" legend at the top of this page states when the policy was last updated and any changes will become effective upon our posting of the revised Policy.

CONTACT

Questions, comments and requests regarding this Policy are welcomed and should be addressed to lisa@turnermarke.com