



(A) This Policy

This Policy is provided by Syntony (Search & Selection) Ltd and is addressed to individuals outside our organisation with whom we interact, including (but not limited to) Candidates, Participants and Sources. Defined terms used in this Policy are explained in Section (N) below.

For the purposes of this Policy, Syntony (Search & Selection) Ltd is the Data Controller. Contact details are provided in Section (M) below.

This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Policy.

(B) Processing your Personal Data

Collection of Personal Data: We may collect Personal Data about you, such as your name, address and contact details. Examples of sources from which we may collect Personal Data include the following:

- We may obtain your Personal Data when you provide it to us (e.g., where you contact us via email or telephone, or by any other means).
- We may collect your Personal Data in the ordinary course of our relationship with you (e.g., if we offer to connect you with our Clients we may collect your Personal Data that are related to such Client opportunities, such as your CV).
- We may receive your Personal Data from other members of the Company
- We may collect Personal Data that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible).
- We may receive your Personal Data from third parties who provide it to us (e.g., past employers; referees; and law enforcement agencies).
- We may receive your Personal Data from job boards that you chose to make public (e.g. Reed, CV Library and other similar job boards)
- We may, with your prior express written consent, conduct background checks, in accordance with the protections provided by applicable law.
- We may collect or obtain Personal Data when you visit the Syntony (Search & Selection) Ltd website (a "Site") or use any features or resources available on or through a Site. When you visit a Site, your device and browser will automatically disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a Site and other technical communications information), some of which may constitute Personal Data.



Creation of Personal Data: We may also create Personal Data about you, such as records of any interviews you attend, details of any job offers made via our agency and our client. This Personal Data helps us to conduct our operations and manage our legitimate business interests.

Personal Data you provide about others: In some circumstances, you may provide us with Personal Data about others. For example, you might act as a Source and provide comments on a Candidate or Participant. Whenever you provide any such Personal Data, we rely on you to ensure that you have a lawful basis for providing such Personal Data to us, and that you have complied with applicable law and with the terms of this Policy. If you are unable to do so, please refrain from providing the Personal Data of third parties to us.

Relevant Personal Data: The categories of Personal Data about you that we may Process include:

- Personal details: given name(s); preferred name; gender; date of birth / age; nationality; photograph; marital status; job title; employer entity; department; salary and compensation details; visa number (where applicable).
- Contact details: home address; work address; home telephone number; work telephone number; work mobile number; personal mobile telephone number; personal email address; work email address; and social media profile details.
- Employment records: dates and details of current and former positions held; details of current and former employers; dates of employment; job titles; job locations; subject matter experience; and details of any employment disciplinary issues or incidents.
- Details of referees: details of referees you may provide, including the relationship that you may have with each such referee, and the duration for which you have known each such referee.
- Background checks: details revealed by background checks conducted in accordance with applicable law and subject to your prior express written consent, including details of past employments, details of residence, credit reference information, and criminal records checks.
- Views and opinions: your views on Candidates or Participants, where applicable.

Lawful basis for Processing Personal Data: In Processing your Personal Data in connection with the purposes set out in this Policy, we may rely on one or more of the following legal bases:

- we have obtained your prior express consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way);
- the Processing is necessary in connection with any contract that you may enter in to with us or our clients
- the Processing is required by applicable law;
- the Processing is necessary to protect the vital interests of any individual; or



- we have a legitimate interest in carrying out the Processing, which is not overridden by your interests, fundamental rights, or freedoms. Where we rely on this legal basis, our legitimate interests are:
 - Our legitimate interest in the management and operation of our business;
 - Our legitimate interest in the promotion of our business; and
 - Our legitimate interest in the provision of services to our Clients.

Processing your Sensitive Personal Data: We do not seek to collect or otherwise Process your Sensitive Personal Data, except where:

- the Processing is required or permitted by applicable law (e.g., to comply with diversity reporting obligations);
- the Processing is necessary for the detection or prevention of crime;
- the Processing is necessary for the establishment, exercise or defence of legal rights; or
 - we have, in accordance with applicable law, obtained your prior explicit consent before Processing your Sensitive Personal Data (as above, this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Purposes for which we may Process your Personal Data: The purposes for which we may Process Personal Data, subject to applicable law, include:

- Recruitment activities on behalf of Clients: recruitment operations; advertising Client opportunities; providing services to our Clients; enabling Clients to understand which Candidates are interested in their opportunities; record-keeping; and performing background checks.
- Leadership consulting: providing leadership consulting services to Clients.
- Provision of services to you: providing our Sites and other services to you; attending meetings with you; attending telephone calls with you; and otherwise communicating with you in relation to those services.
- Our Sites: operating and managing our Sites; providing content to you; displaying advertising and other information to you; and communicating and interacting with you via our Sites.
- Coaching and training: providing you with coaching and training and preparation for interviews.
- Newsletters and other marketing communications: communicating with you via any means (including via email, telephone, text message, social media, post or in person) news items and possible opportunities in which you may be interested.
- Communications and IT operations: management of our communications systems; operation of IT security; and IT security audits.
- Health and safety: health and safety assessments and record keeping; and compliance with related legal obligations.



- Financial management: sales; finance; corporate audit; and vendor management.
- Surveys: engaging with you for the purposes of obtaining your views on relevant issues and topics.
- Improving our services: identifying issues with existing services; planning improvements to existing services; creating new services.
- Future planning: succession and organizational planning, including budgeting.

(C) Disclosure of Personal Data to third parties

We may disclose your Personal Data to other members of Syntony (Search & Selection) Ltd , for legitimate business purposes (including providing services to you) in accordance with applicable law. We may also share aggregate demographic information with our Clients, trusted affiliates and advertisers for the purposes outlined in this Policy. While we make all reasonable efforts to ensure that such information is anonymized, it is possible that small amounts of your Personal Data may be included.

In addition, we may disclose your Personal Data to:

- legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- our Clients, for the purposes of providing services to those Clients, in accordance with the provisions of this Policy;
- accountants, auditors, lawyers and other outside professional advisors to the Syntony (Search & Selection) Ltd network, subject to binding contractual obligations of confidentiality;
- third party Processors (such as providers of background checking services), located anywhere in the world, subject to the requirements noted below in this Section (C);
- any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security;
- any relevant third-party acquirer(s), in the event that we sell or transfer all or any portion of our business or assets (including in the event of a reorganization, dissolution or liquidation); and
- our Sites may use third party plugins or content (e.g., Facebook, Twitter, Google+ and LinkedIn). If you choose to interact with any such plugins or content, your Personal Data may be shared with the relevant third party.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data.



(D) International transfer of Personal Data

Because of the international nature of our business, we may need to transfer your Personal Data to third parties as noted in Section (C) above, in connection with the purposes set out in this Policy. For this reason, we may transfer your Personal Data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located. In particular, your Personal Data may be disclosed to third parties, to the extent appropriate, in connection with any Client opportunities in respect of which you are a Candidate, or any Leadership Assessment in which you are a Participant.

(E) Data Security

We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

You are responsible for ensuring that any Personal Data that you send to us are sent securely.

(F) Data Accuracy

Your Personal Data that we Process will be kept accurate and, where necessary, kept up to date. We take every reasonable step to ensure that:

- your Personal Data that we Process are accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Data.

(G) Data Minimisation

We take every reasonable step to ensure that your Personal Data that we Process are limited to the Personal Data reasonably required in connection with the purposes set out in this Policy.

(H) Data Retention

We will keep copies of your Personal Data in a form that permits identification only for as long as is necessary in connection with the purposes set out in this Policy, unless applicable law permits or requires a longer retention period.



The criteria for determining the duration for which we will keep your Personal data are as follows: we will retain your Personal Data for 6 months, or for as long as we have your permission to contact you. If you are a candidate that we successfully place into a position we may keep your personal information for up to 7 years. Should you wish to withdraw/extend that permission, you may do so using the contact details provided in Section (M) below.

(I) Your legal rights

Subject to applicable law, you may have a number of rights regarding the Processing of your Personal Data, including:

- the right to request access to, or copies of, your Personal Data that we Process or control;
- the right to request rectification of any inaccuracies in your Personal Data;
- the right to request, on legitimate grounds:
 - o erasure of your Personal Data that we Process or control; or o restriction of Processing of your Personal Data that we Process or control;
- the right to object, on legitimate grounds, to the Processing of your Personal Data;
- the right to have your Personal Data transferred to another Controller, to the extent applicable;
- where we Process your Personal Data on the basis of your consent, the right to withdraw that consent; and
- the right to lodge complaints regarding the Processing of your Personal Data with a Data Protection Authority.

This does not affect your statutory rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Policy, or about our Processing of your Personal Data, please use the contact details provided in Section (L) below.

(J) Terms of Use

All use of our Sites is subject to our Privacy Policies <http://syntony.co.uk/wp-content/uploads/2018/04/Syntony-Privacy-Notice.pdf>

(K) Your obligations

If, and to the extent that, you are a Candidate or Participant, we rely on you to provide us with complete and accurate Personal Data about you, so that we can provide appropriate services to you and to our Clients.

If, and to the extent that, you are a Source, we rely on you to ensure that you are lawfully able to disclose Personal Data to us, as set out in this Policy.



(L) Contact details

If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Data by Syntony (Search & Selection) Ltd please contact Justin Kelsey, Director, gdpr@syntony.co.uk, 1 Webbs Court, Buckhurst Avenue, Sevenoaks, Kent, TN13 1LZ, 01732 742211

(M) Definitions

- **‘Candidate’** means a candidate, or potential candidate, for a position with a Client.
- **‘Client’** means a client of Syntony (Search & Selection) Ltd, or any other member of the Syntony (Search & Selection) Ltd network.
- **‘Controller’** means the entity that decides how and why Personal Data is Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
- **‘Data Protection Authority’** means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- **‘Leadership Assessment’** means any leadership assessment service (including, but not limited to, any management audit, leadership consulting service, coaching, team development, team effectiveness analysis, or succession planning) provided by the Controller to the Client for the purposes of assessing the leadership potential of its own Personnel or other individuals selected by the Client.
- **‘Participant’** means any individual participating in a Leadership Assessment.
- **‘Personal Data’** means information that is about any individual, or from which any individual is identifiable. Examples of Personal Data that we may Process are provided in Section (B) above.
- **‘Personnel’** means any current, former or prospective employee, consultant, temporary worker, intern, other non-permanent employee, contractor, secondee or other personnel.
- **‘Process’, ‘Processing’ or ‘Processed’** means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.



- **‘Processor’** means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
- **‘Sensitive Personal Data’** means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.
- **‘Source’** means any person that provides any view or opinion regarding the qualities of any Candidate or Participant, for any purpose, including but not limited to the suitability of a Candidate or Participant for a particular role.