

## Select Executive Search GDPR Privacy Notice

### What is the purpose of this document?

Select Executive Search is committed to protecting the privacy and security of the personal information of our Candidates, Clients (hiring/outplacement entity), Suppliers and website users.

Select Executive Search is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. This document makes you aware of how and why your personal data will be used and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

### Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### The kind of information we hold about you

In connection with our executive search and outplacement services, we will collect, store, and use the following categories of personal information about you:

#### Candidates:

- The information you have provided to us in your CV and covering letter.
- The information you have provided, including but not limited to name, title, address, telephone number, mobile, email address, date of birth, gender, employment history, qualifications.
- Any relevant information you provide to us during telephone calls, meetings, emails, interviews or any other means.
- From your named referees.
- Data gathered from our network.
- Data gathered from publicly available sources.
- Other sources that are relevant and appropriate.

### **Clients or Suppliers:**

- The information you have provided, including but not limited to individual name, title, telephone number, mobile, email address.
- Any relevant information you provide to us during telephone calls, meetings, emails, interviews or any other means.
- Data gathered from publicly available sources.

### **How is your personal information collected?**

#### **Candidates**

We collect personal information from, but not limited to, the following sources:

- You, the Candidate.
- Our network.
- When requested to do so, from your named referees.
- Other sources that are relevant and appropriate.
- Data gathered from publicly available sources.

#### **Clients and Suppliers**

We collect personal information from, but not limited to, the following sources:

- You, the Client and Supplier.
- Data gathered from publicly available sources.

### **How we will use information about you**

#### **Candidates**

We will process your personal data when it is: necessary for a contract or entering into a contract with you, for legitimate interests, for compliance with a legal obligation.

Having received your CV, covering letter or any other forms of communication, we will analyse that information to decide whether you meet the requirements to be shortlisted for the role or considered for a potential role. If you do, we will subsequently decide whether your details should be presented to the Client. If they decide to call you for an interview, they will typically use a condensed version of the information you provided to us.

We will use the personal information we collect about you to:

- Assess your skills, qualifications and suitability for a role or potential role.
- Assess you, your experience and your skills to determine how we can deliver the most value via our Outplacement Service.
- Carry out background and reference checks, when required and requested.
- Communicate with and guide you through the hiring process.
- Keep records related to the various stages in the hiring processes.
- Comply with legal or regulatory requirements.

## **Clients or Suppliers**

We will use the personal information we collect about you:

When it is necessary for a contract or entering into a contract with you, for legitimate interests and or for compliance with a legal obligation.

## **If you the Candidate fail to provide personal information**

If you fail to provide information to us or the Client when requested, which is necessary to consider your application, such as evidence of qualifications, required references or work history, we and or the Client will not be able to take your application further.

## **How we use particularly sensitive personal information**

We may use your particularly sensitive personal information in the following ways:

- We may use information about your disability status to consider whether we need to provide appropriate adjustments during the process, for example whether adjustments need to be made for an interview.

## **Information about criminal convictions**

We do not envisage that we will process information about criminal convictions.

## **Automated decision-making**

We do not use or avail of automated decision making.

## **Data sharing**

### **Why might you share my personal information with third parties?**

We will only share your personal information with: associates, contractors and consultants and third-parties who are engaged by Select Executive Search.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **Data security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. For Candidates we limit access to your personal information to the Client and those employees, associates, contractors, consultants and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## Data retention

### How long will you use my information for?

As we aim to build life-long relationships with Candidates, Clients and Suppliers, the basis for which we retain Candidate, Client and Supplier data is for ongoing purposes. However, we regularly conduct data-cleansing and updating exercises on Candidate, Client and Supplier information to ensure that the data we hold is accurate and, that we are not holding data for longer than is necessary.

### Your rights of access, correction, erasure, and restriction regarding personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Seamus Boylan, Director, [sboylan@select.ie](mailto:sboylan@select.ie).

### The Lawful bases for processing your personal information

The lawful bases, as set out in Article 6 of the GDPR, we mainly follow for processing personal information of Candidates, Clients and Suppliers are:

- **Contract:** the processing is necessary for a contract we have with the Candidates, Clients, Suppliers, or because they have asked us to take specific steps before entering into a contract.

- **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.
- **Legal obligation:** the processing is necessary for us to comply with the law (not including contractual obligations).
- **Consent:** where you have given clear consent for us to process your personal data for a specific purpose.

### Transfer limitation

The GDPR restricts data transfers to countries outside the EEA to ensure that the level of data protection afforded to individuals by the GDPR is not undermined. You transfer Personal Data originating in one country across borders when you transmit, send, view or access that data in or to a different country.

We will only transfer Personal Data outside the EEA if one of the following conditions applies:

- (a) the European Commission has issued a decision confirming that the country to which we transfer the Personal Data ensures an adequate level of protection for the Data Subject's rights and freedoms;
- (b) appropriate safeguards are in place such as binding corporate rules (BCR), standard contractual clauses approved by the European Commission, an approved code of conduct or a certification mechanism, a copy of which can be obtained from the DPO;
- (c) the Data Subject has provided Explicit Consent to the proposed transfer after being informed of any potential risks; or
- (d) the transfer is necessary for one of the other reasons set out in the GDPR including the performance of a contract between us and the Data Subject, reasons of public interest, to establish, exercise or defend legal claims or to protect the vital interests of the Data Subject where the Data Subject is physically or legally incapable of giving Consent and, in some limited cases, for our legitimate interest.

### Queries and Complaints

If you have any questions about this privacy notice or how we handle your personal information, please contact Seamus Boylan, Director, [sboylan@select.ie](mailto:sboylan@select.ie). You have the right to make a complaint at any time to the Data Protection Commissioner (DPC).