### **OUR PRIVACY POLICY**

#### Who we are

Colwell & Partners is an Executive Search company for the creative communications industry.

We are registered in England and Wales under number 09295413 with a registered address of The Old Bank, 205-207 High Street, Cottenham, Cambridge, CB24 8RX

#### What this policy covers

This policy covers the type of personal data Colwell & Partners collect, why we collect it and how long we keep it. It also sets out the legal basis we have for using your personal data and explains your rights. We take data protection very seriously and we want to assure you that any personal data is safe and secure. We only use your data to provide you with the best service possible.

## How we collect and use personal data

For our candidates, clients and referees, our legitimate interest in your information is driven by the need to assess suitability for potential roles, to find potential candidates, to build our insight into our relevant markets, and to contact clients and referees

We gather information to help our clients and our candidates fulfil their briefs to us and we may receive your data from various sources:

- Directly from you, verbally or in writing or through interaction with our website
- Through publicly available information for example on company websites and social media sites (e.g. LinkedIn), events and recommendations from other candidates or colleagues.

The processing of your personal information includes the storage and use of your contact details, emails and your CV, as well as any references provided or obtained. Should we process personal data defined as Special Personal Data, for example ethnicity, criminal convictions and health information, we will ask for your consent to process these data sets.

### How and why we use your data

We will only share your data with our clients when your skills, experience and expertise are aligned with the briefs we take from our clients.

If you are chosen by the client to progress through an interview process we will proceed in collecting more information about you at the interview stage and moving through the process.

Colwell & Partners use external companies to provide operational services, e.g. outsourced IT service providers, and they may be able to view your data, however we have strict confidentiality and data protection clauses in their contracts to ensure your data remains secure.

# How long we keep your data for and our legal basis for doing so

We only retain your information for as long as is necessary for us to fulfil our requirements or to comply with our legal obligations. Please be advised that we may retain some of your information after you cease to use our services if this is necessary to meet our legal obligations, for example for tax and accounting purposes.

When determining the retention of your data will we consider factors including:

- Our contractual obligations and rights in relation to the information involved
- Legal obligations under applicable law to retain data for a certain period of time
- Statute of limitations under applicable law(s)
- If you have made a request to have your information deleted
- Any guideline issued by relevant date protection authorities

For all our prospective candidates, clients and referees, our legitimate interest in your information is driven by the need to assess suitability for potential roles. To find potential candidates, to build insight into our relevant markets, and to contact clients and referees.

#### If you are a client

The legal basis for processing your company's data is legitimate interest in that we are using this data for the purpose of contacting and corresponding with you with regards to our services, as well as the contact details for any organisation that you represent.

We may store and use your data for recruitment activities.

Where there exists a contract between us and we have provided services, we shall keep your information, including information about the services provided, for up to six years to comply with statutory obligations.

#### Other

The business research efforts may involve the sourcing of data on data subjects from third party and/or public domains e.g. websites, and social media. This is to ensure that as a specialist recruitment business we remain up to date within the market changes and the movements of professionals.

We deem these uses of data to be necessary for our legitimate interests as an organisation providing various recruitment and consultancy services.

# **Cookie Policy & Third Party Disclosure**

We do not use cookies for tracking purposes

We do not sell, trade, or otherwise transfer your personally identifiable information to outside parties

#### **Outside the EEA**

At present we do not transfer personal data outside the EEA

# **Personal and Confidential Information security**

We have in place security measures to protect your Information against unauthorised or unlawful use, and against accidental loss, damage or destruction. We put in place strict confidentiality agreements (including data protection obligations) with our third-party service providers.

### **Your Rights**

By law, you have rights when it comes to protecting your personal date:

**Right of Access to your information:** if (If) you require access to the personal data we hold about you then please write to us or email us at the addresses below or call us on the number below.

**Right to Rectify your information:** If you believe that the information we hold about you is incorrect then please write to us or email us at the addresses below or call us on the number below.

**Right to Erase your information:** If you do not want Colwell & Partners to hold your personal data any longer then please write to us or email us at the addresses below or call us on the number below.

**Right to Restriction of Processing**: If you believe that your personal data is inaccurate, or that Colwell & Partners is processing your personal data unlawfully and you do not want your personal data erased and you wish to restrict the processing of your personal data, then please write to us or email us at the addresses below or call us on the number below.

**Right to Object:** If you believe that there are no legitimate grounds for processing your data or that you no longer wish to receive marketing communications, then please write to us or email us at the addresses below or call us on the number below.

#### Updates to this policy

This Policy was last updated in May 2018. Our policy complies with UK law including that required by the EU General Data Protection Regulation (GDPR). Should you have any questions regarding this policy or anything related to the processing of personal data, please contact us. Please note that we may from time to time update this Policy.

#### How you can contact us

If you are unhappy about how we've handled you information, or have further questions, on the processing of your personal data please get in touch.

e: contact@colwellandpartners.com

t: +44 7540 476 919

a: The Old Bank, 205-207 High Street, Cottenham, Cambridge, CB24 8RX

If you are still not satisfied with the way your complaint was handled, you can refer your complaint to UK Information Commissioner's Office. https://ico.org.uk/concerns/