

PRIVACY POLICY

OSPREY CLARKE LTD	OSPREY CLARKE INTERIM EXECUTIVES LLP
OSPREY CLARKE INTERNATIONAL AND EMERGING MARKETS LLP	PANDION RESEARCH LLP

1. Introduction

- 1.1. Osprey Clarke are committed to protecting the personal information and privacy of the candidates we represent and the clients for whom we work.
- 1.2. This Information Notice, together with any other documents referred to in it, sets out the basis on which any personal data that we collect from or about you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we treat it.
- 1.3. For the purpose of the General Data Protection Regulation, the data controller is Osprey Clarke (company number 02741601), whose registered office is at 38 Queen Anne Street, London W1G 8HZ.
- 1.4. We may update this Information Notice from time to time. Any changes we make in the future will be posted on our website at <http://www.ospreyclarke.com/>. Please check back regularly to see any updates or changes.

2. Data Protection Officer

- 2.1. The contact details for our Data Protection Officer are as follows:

- 2.1.1. Craig Marcham
- 2.1.2. Partner
- 2.1.3. craigmarcham@ospreyclarke.com
- 2.1.4. 0207 268 2063
- 2.1.5. 53 Welbeck Street London W1G 9XR

- 2.2. It is the responsibility of the Data Protection Officer to keep our organisation and our staff informed and advised about their obligations to comply with data protection laws, to monitor compliance with those laws, to advise on data protection impact assessments, to train staff and conduct internal audits, and to be the first point of contact for supervisory authorities and for individuals whose personal data we are processing.

3. Particulars of processing

- 3.1. We process personal data about our stakeholders (by which we mean current and former candidates, clients and any other person who has contact with us) in a range of ways, and for a range of purposes.

- 3.2. The categories of person about whom we process personal data are described in more detail in the Particulars of Processing that are set out in the Schedules to this Information Notice. The specific Schedules are as follows:

- 3.2.1. Candidates;
- 3.2.2. Clients;

- 3.3. It may be the case that you have contact with us in more than one capacity, so please look at all the Schedules that may apply to you if you wish to know more about how we process your personal data. 4.

Your rights as a data subject

- 4.1. This Section 4 sets out the rights that you have as a data subject, by reason of the General Data Protection Regulation.

- 4.2. You have the following rights:

- 4.2.1. The right to request access to the personal data that we hold about you;
- 4.2.2. The right to request rectification of the personal data that we hold about you;
- 4.2.3. The right to request erasure of the personal data that we hold about you;
- 4.2.4. The right to request restriction of processing about you;
- 4.2.5. The right to object to processing; and
- 4.2.6. The right to data portability.

If you wish to invoke any of the above rights, please notify our Data Protection Officer using the contact details set out in Section 2 above. Please include the words DATA PRIVACY REQUEST in the subject line of your email, or at the top of your letter.

4.3. Where our processing of personal data is based on your having given consent, you have the right as a data subject to withdraw that consent at any time. If you wish to invoke this right, please notify our Data Protection Officer using the contact details set out in Section 2 above. Please include the words DATA PRIVACY REQUEST in the subject line of your email, or at the top of your letter.

4.4. You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Office of the Information Commissioner, full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

5. **Contact details**

5.1. You can contact us in the following ways if you have any questions or concerns about personal data and privacy matters:

5.1.1. craigmarcham@ospreyclarke.com

5.1.2. 0207 268 2063

5.1.3. 53 Welbeck Street London W1G 9XR

5.2. Please include the words DATA PRIVACY REQUEST in the subject line of your email, or at the top of your letter.

Schedule

Particulars of Processing

Category of data subject	Candidates
Categories of personal data that we process	Name, address and other contact details Date of birth Nationality (and work permit details where relevant) Academic history and qualifications Career history, referee details and references Salary and benefit entitlement
Source of information	The above personal data is received direct from the data subject.
Purposes of the processing	We process the personal data listed above for the purposes of operating a recruitment service, providing services to both candidates and employers.
Lawful basis of processing	We are relying on the lawful basis of legitimate interests. Our legitimate interest is to be able to perform our task as a search firm appropriately, namely assess candidates and make sure we select the right candidates for our clients. The candidates' interest is being considered for the professional opportunity they are applying for.
Recipients of the personal data	The personal data that we hold about candidates will be disclosed to prospective employers, where we have the specific permission of the candidate to such disclosure. The personal data will be securely stored by Executives Place Ltd., a company registered in England under company number 7100165 with its registered office at 137-139 Brent Street, London NW4 1DG, United Kingdom and trading as Not Actively Looking (" Not Actively Looking "). Not Actively Looking's services include the provision of a platform and a website that allows search firms to store contact details and professional information for the search firms' own candidates and clients. The storage is carried out under a written contract that includes safeguards for the rights and freedoms of data subjects.
Overseas transfers	Overseas transfers are possible if the client is a company based overseas. Those companies will sign a contract with us, which will contain GDPR clauses. Therefore, they will also be obliged to comply with GDPR when processing the candidates' data.
Duration of processing	The data are processed within a particular assignment, which generally takes a couple of months.

<p>Is the provision of this personal data a statutory or contractual requirement, or a requirement necessary to enter into a contract?</p> <p>If so, is the data subject obliged to provide the personal data in question?</p> <p>What are the possible consequences of failure to provide such data?</p>	<p>You are not obliged to provide the personal data in question. However, if you do not provide the personal data, we may be unable to match your details up with potential employers.</p>
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<p>Is there any automated decision-making done using the personal data (including profiling)?</p> <p>If so, (a) what logic is involved, and what are the significance and envisaged consequences of the processing for the data subject?</p>	<p>No.</p>
<p>Plans for further processing</p>	