

Crewdson & Partners Privacy Notice

We are committed to protect the privacy of those with whom we interact and recognise the need to respect and safeguard information collected or disclosed to us (called "Personal Information", explained below). Since leaving the European Union, the GDPR Directive has been retained into UK law in the form of the UK GDPR.

This Privacy Notice is intended to inform how we may use your Personal Information. It is presented in a layered format to help you find the information you need with ease with the option of following a link to learn more should you wish. If you are still unable to find the information you require, you may contact us by reference to the details set out below in section 1. Please click on the following links for further information on our privacy practices:

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1. Who are we?

We are Crewdson & Partners Limited ("we", "us"). We are an executive search company operating globally within the broad asset, wealth, and alternatives investment industry. We operate the website <http://crewdsonpartners.com>, (the "website").

We are a registered fee payer with the Information Commissioner's Office (registration number Z2519759). If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact us using the following details:

Crewdson & Partners
2nd Floor, Regis House
45 King William Street
London
EC4R 9AN

gdpr@crewdsonpartners.com

We deliver executive search, team lift-outs, succession planning, and talent identification services to clients around the world (our "**services**"). This policy applies if you are a client, candidate, job seeker, supplier, source, or referee. For the purposes of this policy and privacy notice:

- **Candidates** – An individual who is a candidate or potential candidate for one of our clients.
- **Clients** – Any business, firm, organisation, government body or individual that instructs us to perform any of our services.
- **Talent** – Teams or individual professionals who are expert in their field.
- **Sources and Referees** – people who provide us with information or intelligence on a potential candidate, or who provide a work or personal reference on a candidate.
- **Suppliers** – business contacts in our supplier organisations.
- **Job Seekers** – Individuals who approach us for help in finding a new professional challenge.

2. What is Personal Information, and which Personal Information may we collect about you?

"**Personal Information**" comprises information that relates to you and/or information from which you can be identified, directly or indirectly. Information which identifies you may consist of your name, address, telephone number, photograph, location data, an online identifier (e.g. cookies identifiers and your IP address) or one or more factors specific to your physical, economic, cultural or social identity. When we combine other information (i.e. information that does not, on its own, identify you) with Personal Information, we treat the combined information as Personal Information.

We may collect, use, store and transfer Personal Information about you which we have grouped together as follows:

- **Identity and Contact Data** - First name, last name and title, address, email address, telephone number.
- **Career History and Education Data** CV, professional expertise, academic and professional qualifications, reference information, employment history, interview notes, expenses, work permit information and identification information.
- **Financial Data** - Compensation, all benefits, and other employment related reward schemes
- **Services Data** - Information about how you use our services, details of which services you have received from us, history of correspondence and communication with you and information about any complaints or enquiries you make to us.

3. How is your Personal Information collected?

See below a summary of ways in which we gather data.

Candidates

- **Personal Information that you provide directly.** You may give us your Identity and Contact Data, Career History and Educational Data, and Financial Data, as part of compliance within a search process for one of our customers, or by corresponding with us by email, phone or otherwise.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources. These include, but are not restricted to, your employer's website, professional bodies, industry publications and third-party web-based platforms.

Job Seekers

- **Personal Information that you provide directly.** You may give us your Identity and Contact Data, and Financial Data, when approaching us for help to find a new challenge.

Clients and Suppliers

We collect your Identity and Contact Data, Financial Data and Services Data when we correspond with you about our services, and from publicly available sources such as Companies House.

Sources and Referees

We will obtain your Identity and Contact Data as well as information regarding your credentials as a source or referee, details of your relationship and your opinions of Candidates, either directly from you or from publicly available information. Referees need to be aware of the exemption in the Data Protection Act 2018 which applies to the giving or receiving of confidential references.

4. How do we use your information?

We will only use your Personal Information when the law allows us to do so. Most commonly, we will use your Personal Information in the following circumstances:

- Where we are required to fulfill a contract entered into with you.
- Where we have a legitimate interest (or those of a third party) and where your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Purposes for which we may use your Personal Information

For each purpose, we describe the legal bases on which we rely to justify such use of your Personal Information.

Category	Purpose/Activity	Type of data	Legal basis
Candidate	To deliver our services undertaking a search mandate for a Client	(a) Candidate's identity and contact details (b) Education and career history (c) Salary and remuneration information	(i) Necessary for our legitimate interests in fulfilling contractual obligations to provide our clients with candidates who meet their expectations (ii) Necessary to take steps at your request to ensure accuracy of Data prior to entering into a contract with a client
Job Seeker	To bring you to our attention your interest in seeking a fresh career challenge	(a) Job seekers identity and contact details (b) Education and career history (c) Salary and remuneration information	(i) Necessary so we might contact you with a new career opportunity (ii) Necessary for our legitimate interests in attracting talent (iii) To comply with our legal obligations,

Client	To provide our services to you, or your employer and to manage our relationship with you including in respect of commercial terms, management of assignments, contractual agreements and our Privacy Notice	(a) Identity and contact details of you or your representative (b) Information about your use of our services, and communication protocols between us and you	(i) Performance of a contract with you (if the services are provided to you directly) (ii) Necessary for our legitimate interests in providing our services to corporate clients (if the services are provided to your employer)
Supplier	To carry out our contractual obligations to you, if you are our supplier or subcontractor, including management of billing and payments	(a) Identity and contact details of you or your representative (b) Information about our use of your services and communications between us and you (c) Bank account details	Necessary for our legitimate interests in receiving services from our suppliers to ensure our business is run efficiently
Sources and Referees	To perform our services to our Clients which requires us to obtain third party opinions on Candidates	(a) Your identity and contact details (b) Information regarding the Candidate's employment history and education (c) The basis upon which you qualify as a source or referee	Necessary for our legitimate interest in ensuring our services are professionally and successfully undertaken for our Clients
All Categories	Business purposes - for record keeping, complying with best practice and for other administrative, operational and security reasons	(a) Your identity and contact details (b) Information about your use of our services and any enquiries or complaints you have made to us (c) Your communication and marketing preferences	(i) Necessary for our legitimate interests in running our business efficiently and successfully and to keep our records updated (ii) Necessary to comply with a legal obligation
All Categories	To prevent and detect crime, fraud or corruption and to meet our legal, regulatory and ethical responsibilities	(a) Your identity and contact details (b) Your IP address (c) Information about your use of our services and about any complaints you have made to us	Necessary to comply with our legal obligations

Please be aware that we are not responsible for the data processing activities of others, such as our Clients.

Combining Personal Information

We may aggregate Personal Information from different sources to help us screen and assess whether you have the relevant skills and expertise for a particular role.

Change of Purpose

Where we need to use your Personal Information for a reason other than that for which we collected it, we will only use it where that reason is compatible with the original purpose. If we need to use your Personal Information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

5. To whom do we disclose your information?

We will use your Personal Information for our internal business purposes, some of which are mentioned above. We may also disclose your information to the following entities:

I. Clients

We may need to disclose your Personal Information to our Clients for whom we provide executive search services. In the first instance, we will only disclose a Potential Candidate's basic details to a Client (such as the Candidate's name, employment history and qualifications) so that the Client may assess whether that Potential Candidate is a suitable fit. We will only provide more detailed information (such as candidate profile, contact details and references) once we have obtained the Potential Candidate's permission. If we have identified a Talent through our talent mapping activities, we will only disclose a Talent's details to a Client in anonymous form, so that the individual Talent cannot be identified. We will share information only as anticipated in this Privacy Notice and wherever appropriate limit disclosure to information in aggregate and/or anonymous form to avoid or limit identifying you personally.

II. Service Providers

We use third party service providers to help us administer activities and services on our behalf. These include bookkeeping, IT and Cyber security services, Accounting, and Legal. We may share Personal Information about you with such third-party service providers solely for the purpose of enabling them to perform services on our behalf; they operate only in accordance with our instructions.

III. Third parties when required by Law

We will disclose your Personal Information to comply with applicable law or respond to valid legal process, including from regulators, law enforcement or other government agencies (in which case such agencies or regulators will be acting as controllers as well); to protect the users of the website (e.g. to prevent spam or attempts to defraud them); to operate and maintain the security of the website (e.g. to prevent or stop an attack on our systems or networks); or to protect our rights or property.

IV. Other Parties in Connection with Corporate Transactions

We may disclose your Personal Information to a third party in the event that all or substantially all of our business or assets are or are intended to be sold or otherwise assigned to another entity.

V. Other Parties at Your Direction

We may share Personal Information about you with third parties when you request such sharing, such as to prospective employers, or to your legal or other professional advisers.

6. What do we do to keep your information secure?

We have in place appropriate physical and technical measures to safeguard your Personal Information. We limit access to your Personal Information to those employees, agents, contractors 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. When we use service providers to assist us in processing your Personal Information, we have written contracts in place with such service providers. They cannot do anything with your Personal Information unless we have instructed them.

Although we take appropriate steps to protect your Personal Information, no website or transmission of data, computer system or wireless connection is completely secure and therefore we cannot guarantee the security of your Personal Information.

International Transfer of Data

By using the website and/or providing us with your Personal Information, you acknowledge that we may collect, transfer, store and process your information encrypted within the Cloud. We will take all reasonable steps to ensure your Personal Information is kept secure and treated in accordance with this Privacy Notice and the requirements of applicable UK law.

7. Data Retention – How long we will store/keep your Personal Information

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

We retain Candidate personal data for three years following the date of last recorded contact with that Candidate.

When your Personal Information is no longer required for the purpose it was collected or as required by applicable law, it will be deleted and/or returned to you in accordance with applicable law.

We will retain Job Seeker personal details for one year following the date of last recorded contact.

In some circumstances you may ask us to delete your Personal Information (see section 8 below).

8. Accessing your Personal Information and other rights you have

We will collect, store and process your Personal Information in accordance with your rights under any applicable data protection laws. Under certain circumstances, you have the following rights in relation to your Personal Information:

- I. **Subject Access** - you have the right to request details of the Personal Information which we hold about you and copies of such Personal Information.
- II. **Right to Withdraw Consent** – where you have consented to our processing of your Personal Information, 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 section 1.

- III. **Data Portability** – you may, in certain circumstances, request us to port (i.e. transmit) your Personal Information directly to another organisation.
- IV. **Rectification** – we want to ensure that the Personal Information about you that we hold is accurate and up to date. If you think that any information we have about you is incorrect or incomplete, please let us know. To the extent required by applicable laws, we will rectify or update any incorrect or inaccurate Personal Information about you.
- V. **Erasure ('right to be forgotten')** - you have the right to have your Personal Information 'erased' in certain specified situations.
- VI. **Restriction of processing** – you have the right in certain specified situations to require us to stop processing your Personal Information.
- VII. **Object to processing** – You have the right to object to specific types of processing of your Personal Information,
- VIII. **Prevent automated decision-taking** – in certain circumstances, you have the right not to be subject to decision being taken solely on the basis of automated processing.

Enforcing your rights

If you wish to enforce any of your rights under applicable data protection laws, then please see section [1](#) above. We will respond to your request without undue delay and by no later than one month from receipt of any such request, unless a longer period is permitted by applicable data protection laws, and we may charge a reasonable fee for dealing with your request which we will notify to you. Please note that we will only charge a fee where we are permitted to do so by applicable data protection laws.

Complaints

If you are concerned that we have not complied with your legal rights under applicable data protection laws, you may contact the Information Commissioner's Office (www.ico.gov.uk) which is the data protection regulator in the UK which is where we are located. Alternatively, if you are based outside the UK, you may contact your local data protection supervisory authority.

9. Third-Party Links

Our website contains links to other third-party websites that are not operated by us. We are not responsible for the privacy practices or the content of any linked websites and online applications. If you choose to use any third-party websites, any Personal Information collected by the third party's website will be controlled by the Privacy Notice of that third party. We recommend you take the time to review the privacy policies of any third parties to which you provide Personal Information.

10. Changes to this Privacy Notice

It is important that you check for updates to our Privacy Notice. Changes to this Privacy Notice are made from time to time to ensure they remain contemporary within an evolving legal framework and fit for purpose. The "Date last updated" legend at the bottom of this page states when the notice was last updated and any changes will become effective upon our posting of the revised Privacy Notice.

We will provide notice to you if these changes are material and, where required by applicable law, we will seek your consent. We will provide this notice by email or by posting notice of the changes on our website.

Last updated: February 2022