



PRIVACY POLICY

Who are we?

AIMS International UK Limited (we or us) provides Executive Search services to clients looking to recruit personnel for their businesses. We also provide Leadership Development, Coaching and Assessment services for both clients and candidates.

We are committed to protecting the personal information and privacy of the candidates we represent and the clients for whom we work. We will be clear and transparent about the information we are collecting and what we will do with that information.

This Privacy Policy 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.

For the purpose of the General Data Protection Regulation (Regulation (EC) 2016/679 ("GDPR"), the data controller for any services provided by us and described in this Privacy Policy is AIMS International UK Limited (company number 02490151), whose registered office is at Unit 2, Charnwood House, Marsh Road, Ashton, Bristol, BS3 2NA.

We may update this Privacy Policy from time to time. Any changes we make in the future will be posted on our website at www.aimsinternational.com/uk. Please check back regularly to see any updates or changes.

What does this Policy cover?

- sets out the types of personal data that we collect about you;
- explains how and why we collect and use your personal data;
- explains how long we keep your personal data for;
- explains when, why and with who we will share your personal data;
- sets out the legal basis we have for using your personal data;
- explains the effect of refusing to provide the personal data requested;
- explains the different rights and choices you have when it comes to your personal data; and
- explains how we may contact you and how you can contact us.

What personal data do we collect about you?

We collect the information necessary to be able to find available opportunities and further information needed to assess your eligibility through the different stages of recruitment. This information may include your name, address and other contact details, date of birth, nationality (and work permit details where relevant), academic history and qualifications, CVs, work history, employment and references, salary and benefit entitlement and identification documents. We may also collect other, sensitive personal data about you if required. We only collect sensitive personal data from you, and further process this data, where you have given your explicit consent.



From time to time, we conduct mapping or research exercises on behalf of our clients. This is to enable them to understand a particular market. Here, we may collect certain aspects of your personal data. You will not be contacted by any third party about this unless we first obtain your consent.

If you are receiving coaching or assessment services from us, we will also process any additional information that you choose to provide to us during the course of the coaching or assessment programme.

Where do we collect personal data about you from?

The following are the different sources we may collect personal data about you from:

- **Directly from you.** This is information you provide while searching for a new opportunity and/or during the different recruitment stages.
- **Through publicly available sources,** such as the following:
 - LinkedIn
 - Boardex
 - Not Actively Looking
 - Media
 - Publicly Available Information (e.g. Regulatory News Service)
- **By Reference or word of mouth.** For example, you may be recommended by a friend, a former employer, a former colleague or even a present employer.

How and why we use your personal data?

We use your personal data to match your skills, experience and education with our clients' recruitment requirements. We will initially collect basic information on you such as contact details, job role and experience and then pass this on to the client in search of personnel. If you are considered a suitable candidate for any of the roles we are seeking to fill and continue to the next stage of a recruitment process, we may then collect more information from you at interview (or equivalent) stage and/or thereafter.

If you are receiving coaching or assessment services from us, we use your personal data in order to understand more about you and to assist you with understanding your skills and areas for improvement or future opportunities and options.

How long do we keep your personal data for?

We only retain your information for as long as is necessary for us to use your information as described above or to comply with our legal obligations. However, please be advised that we may retain some of your information after you cease to use our services, for instance if this is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.



When determining the relevant retention periods, we will take into account factors including:

- (a) our contractual obligations and rights in relation to the information involved;
- (b) legal obligation(s) under applicable law to retain data for a certain period of time;
- (c) our legitimate interest where we have carried out a balancing test (see legal basis below);
- (d) statute of limitations under applicable law(s);
- (e) (potential) disputes;
- (f) if you have made a request to have your information deleted; and
- (g) guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information where we no longer require your information for the purposes collected.

Who do we share your personal data with?

Your personal data is shared with the client who has a position to fill. We share your data in order to determine with the client whether you are a good fit for the available position.

What legal basis do we have for using your information?

For prospective candidates, referees and clients, our processing is necessary for our legitimate interests in that we need the information in order to be able to assess suitability for potential roles, to find potential candidates and to contact clients and referees. We carry out a 'balancing test' to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests, before we go ahead with such processing. We keep a record of these balancing tests. You have a right to and can find out more about the information in these balancing tests by contacting us using the details below.

If you are shortlisted as a candidate, or if you are coached or assessed by us, then this may involve the processing of more detailed personal data including sensitive data such as health information that you or others provide about you. In that case we always ask for your consent before undertaking such processing.

For clients, we may also rely on our processing being necessary to perform a contract for you, for example in contacting you.

What happens if you do not provide us with the information we request or you ask that we stop processing your information?

If you do not provide the personal data necessary, or request that we no longer process your personal data, we may not be able to match you with available job opportunities.

Do we make automated decisions concerning you?

No, we do not carry out automated profiling.



Do we use Cookies to collect personal data on you?

No, we do not.

Do we transfer your data outside the EEA?

To better match your employee profile with current opportunities, we may feel it is in your interests for us to transfer your personal data to clients and/or partners in countries outside the EEA. These countries privacy laws may be different from those in your home country. Where we transfer data to a country which has not been deemed to provide adequate data protection standards we will not do so until we have ensured that the relevant client/partner has security measures and approved model clauses in place to protect your personal data.

What rights do you have in relation to the data we hold on you?

By law, you have a number of rights when it comes to your personal data. Further information and advice about your rights can be obtained from the data protection regulator in your country.

1. The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.

2. The right of access

You have the right to obtain access to the personal data we hold about you, if we're processing it. This is so you're aware and can check that we're using your information in accordance with data protection law.

3. The right to rectification

You are entitled to have your information corrected if it's inaccurate or incomplete.

4. The right to erasure

You are entitled to request the deletion or removal of your information where there is no compelling reason for us to keep using it. This is not a general right to erasure and there are some exceptions.

5. The right to restrict processing

You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information but may not use it further. We keep basic personal information of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.

6. The right to data portability

You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.



7. The right to object to processing

You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities).

8. The right to lodge a complaint

You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.

9. The right to withdraw consent

If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or
- further copies of the same information.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

How will we contact you?

We may contact you by phone, email or social media. If you prefer a particular means of contact over another please just let us know.

How can you contact us?

If you are unhappy with how we've handled your information, or have further questions on the processing of your personal data, contact us at privacy@aimsint-uk.com, or write to us at:

Data Administrator
180 Piccadilly
London
W1J 9HF