

PRIVACY STATEMENT

PURPOSES AND METHODS OF PROCESSING PERSONAL DATA

The personal data provided by the data subject (the “data”) will be processed for the following purposes:

- a. to provide access to content, services and news from the world of Ward Howell (the “service”), in accordance with the methods provided for by Ward Howell (“the company and/or Ward Howell”);
- b. to enable the company to carry out surveys designed to improve the quality of the service provided in the legitimate interests of Ward Howell, its subsidiaries and affiliated companies and its sales network (“customer satisfaction”);
- c. to send commercial and/or promotional communications regarding the products and services offered by the company, including career opportunities, career development, placement of executive positions, invitations to Ward Howell events, and to perform market research activities (“marketing”), subject to the consent of the data subject;
- d. to analyse the behaviour, habits and career planning/development of the data subject (with his/her consent), with a view to improving the products and services provided by the company and to meeting the specific needs of customers and clients (“profiling”);
- e. to use images/documents (CVs, certificates, references) of the customer/candidate and/or the data subject as part of the customer profiling activity, in order to improve customer management and the career development as a whole (once again, this is subject to the consent of the data subject).
- f. subject to the consent of the interested party, to communicate the data to subsidiaries directly and indirectly controlled by Ward Howell and/or to companies connected to Ward Howell (“Ward Howell Group companies”), which may process the data of the data subject in order to send sales and/or promotional communications on the products and services of the aforementioned companies, as well as to perform market research activities.
- g. **Recruitment Privacy Policy**
Data protection laws require us to provide you with information and to obtain your consent before processing sensitive data (explained below) relating to you or transferring your data to some countries outside the European Economic Area (“EEA”). We should, therefore, be grateful if you would read the information set out below before submitting your CV and include the following paragraph on your CV to indicate acceptance of the data protection provisions. Any application sent without this acknowledgement will be returned.

"I acknowledge receipt of the information on data processing provided and I consent to the proposed processing of any personal data (including sensitive data) supplied by me (or collected by Simmons & Simmons about me) in the course of my application and the transfer of my data outside the EEA, for the purposes described."

On receipt, details from your CV will be entered into our recruitment database. Information and opinions relating to you provided by you and by others may be added to your entry on the database and your file in the course of the recruitment process. In particular, you should note that your application will be subject to verification. This will involve the following: your references will be taken up and any qualification which is indicated on your application may be verified by contacting the appropriate body.

The information about you held in the database will be used for the purpose of determining your suitability for employment with us or with one of our clients. It may also be held for statistical analysis. If your application for employment is unsuccessful then the information may be held by us in case of any query and for record-keeping purposes. If your application for employment is successful, your details will be subject to further processing by us and you will receive further information about such processing as appropriate.

Your details may be held on our database for ten years. If you need to tell us that you have moved house or that your telephone number has changed then please send the new details to our email.

Your data may be transferred to the firm's international offices and the various entities that make up the WH international network and accessed by authorised WH personnel outside the EEA as well as within it, for the purposes set out above. You should be aware that in territories outside the EEA, laws and practices relating to the protection of personal data are likely to be different and in some cases may be weaker than those within the EEA.

We comply with the stringent safeguards to protect your personal data required by law. If you would like any further details about your rights (which include rights of access to data - subject to exemptions) then please write to privacy@ward-howell.com.

The processing of data for each of the aforementioned purposes may be carried out using paper-based, automated or electronic means, in particular via ordinary mail or by email, via telephone (e.g. automated calls, SMS messages), via fax and via any other IT channel (e.g. websites, mobile apps etc.).

CONSEQUENCES OF FAILURE TO PROVIDE CONSENT

The provision of consent as referred to in letters c), d), e), f), and g) above is optional. However, failure to provide this consent will render it impossible for Ward Howell to carry out the activities referred to in letters c), d), e), f) and g).

OTHER PARTIES WHO MAY PROCESS THE DATA

The data may be processed by parties operating on behalf of the company in line with specific contractual obligations, in EU member states or in countries outside of the EU. The data may be disclosed to third parties in order to comply with legal obligations or orders from public authority bodies, or to allow the company to exercise its rights in court.

TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

Within the context of the company's contractual relations, the data may be transferred outside the European Economic Area (EEA). This may occur via the insertion of the data into databases managed by third-party companies operating on behalf of the company. The management of the databases and the processing of the data therein must comply with the purposes for which this information was collected, and such activities shall be carried out in strict compliance with the applicable laws on the protection of personal data. In cases where the data is transferred outside the EEA, the company will take all appropriate contractual measures necessary and appropriate in order to ensure adequate levels of data protection. These measures may include agreements based on standard contractual clauses for the transfer of data outside the EEA, as approved by the European Commission, among other methods.

THE DATA CONTROLLER AND THE DATA PROTECTION OFFICER

The data controller is Ward Howell International Ltd., with registered office in 46 Syon Lane, Isleworth, Middlesex, TW75NQ, UK. The data subject may contact the Data Protection Officer and the company regarding these issues at the email address privacy@ward-howell.com.

STORAGE OF PERSONAL DATA

The data processed in order to provide the service and to deliver customer satisfaction will be kept by the company for the period considered strictly necessary to achieve these ends. Furthermore, the data processed in order to provide the service may be stored for a longer period, to enable any disputes relating to the provision of the service to be handled. Data processed for marketing and profiling purposes will be kept by the company from the point at which the data subject provides his/her consent until this consent is revoked. In the event that consent is revoked, the data may no longer be processed for the aforementioned marketing and profiling purposes, but may still be stored in order to handle any disputes and/or disagreements and/or to ensure the safety of the customer. The time for which data for marketing and profiling purposes is kept by Ward Howell is in compliance with local regulations and with the provisions set out by the Data Protection Authority.

THE RIGHTS OF THE DATA SUBJECT

The data subject shall have the following rights:

1. the right of access, i.e. the right to obtain confirmation from the company as to whether or not personal data concerning him or her are being processed, and where this is the case, to obtain access thereto;
2. the right to rectification and erasure, i.e. the right to have inaccurate data rectified and/or to have incomplete data completed, and the right to have personal data erased for legitimate reasons;
3. the right to impose restrictions on the processing of personal data, i.e. the right to request the suspension of data processing for legitimate reasons;
4. the right to data portability, i.e. the right to receive the data in a structured, commonly-used and easily readable format, as well as the right to transmit the data to another data controller;
5. the right to object, i.e. the right to oppose the processing of data where legitimate reasons for this exist, including data processed for marketing and profiling purposes, if this is envisaged;
6. the right to contact the competent data protection authority in case of unlawful data processing.

The data subject may exercise the rights listed above by writing to Ward Howell International Ltd., 46 Syon Lane, Isleworth, Middlesex, TW75NQ, UK or to the email address privacy@ward-howell.com.