

OAKSTONE PRIVACY POLICY

Who are we?

Oakstone International
Office A30 Arena Business Centre, Holyrood Close, Poole, Dorset, BH17 7FJ
Email; info@oakstone.co.uk
Contact: 0845 456 4849

We provide executive search services to clients looking to recruit personnel for their businesses.

What does this Policy cover?

We at Oakstone take your personal data seriously. This policy:

- 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 includes CV's, identification documents, educational records, work history, employment and references.

We may also collect sensitive personal data about you as and when required in the form of Gender details, Salary Information, Copies of Passports and Psychometric Test. We only collect sensitive personal data from you, and further process this data, where you have given your explicit consent.

Please do not provide us with any Personal Information if you do not agree with this policy.

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.** We use the following public sources:
 - LinkedIn
 - CV Library
 - Xing
 - eFinancials
 - Lusha
- **By Reference or word of mouth.** For example, you may be recommended by our clients, a friend, a former employer, a former colleague or even a present employer.

How and why we use your personal data?

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is that we have a legitimate interest.

We use your personal data to provide our services. We use personal information to render Services to you and to our clients. We do this to fulfil our contractual relationships with you and our clients and where we have a legitimate, beneficial interest in using Personal Information in order to conduct our business.

This includes matching your skills, experience, and education with a potential employer. We will initially collect basic information on you such as contact details, job role and experience to create a profile.

Using your profile we may contact you from time to time about potential opportunities with our clients, then if you agree we will pass your profile on to the client in search of personnel. If you are chosen by the client and go through to the next stages, then we may ask for more details information from you at the interview (or equivalent) stage and onwards in that manner.

You can object to the creation of your profile at any time, if you object, we will remove your profile from our database meaning that you may not be considered for opportunities in the future.

We use your Personal Information to respond to any inquiries from you and will keep a record of correspondence.

We may use Personal Information to create analytics and thought leadership materials, any published information will only refer to larger aggregations of individuals and will not identify individuals. We perform analytics because we have a legitimate beneficial business interest in doing so.

We may use your Personal Information to send you information or marketing material. We send informational emails, articles, white papers and information regarding our services as well as from

How long do we keep your personal data for?

We retain your Personal Information for as long as needed or permitted considering the purposes for which it was obtained.

The criteria used to determine our retention periods include: -

- The length of time we have a continued relationship with you or our client
- A period beyond the time of the ongoing relationship if we have a legitimate internal need such as a need to retain information for analysis, record keeping and compliance with data retention schedules
- If there is a legal obligation to do so

Who do we share your personal data with?

Your personal data is shared with the client who initiates a search for personnel. The search for which you are considered, to ascertain if you are a good fit for the available position. We may from time to time contact a referee but this will be with your prior consent.

We may also use or disclose Personal Information in order to comply with applicable laws, respond to inquiries from public or government authorities, including those outside of your country of residence or to protect the rights, privacy, safety or property of Oakstone, our affiliates, you or others.

We cannot assume any responsibility for the actions or omissions of 3rd parties such as clients, including the way they use Personal Information received either from Oakstone or from other independent sources.

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.

If you are shortlisted as a candidate, 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 ask that we stop processing your information?

If you do not provide the personal data necessary or withdraw your consent for the processing of 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?

To provide better service to you on our websites, we use cookies to collect your personal data when you browse. See our cookie policy for more details.

Location of Personal Information Collected & Maintained

Your Personal Information may be collected, used, processed, disclosed and transferred to and within the United States of America and other countries where we engage with clients and service providers. Your Personal Information may be transferred to countries outside of your country of residence, these countries may have different data protection rules that your country of residence. Some of the non-EEA countries are recognised by the European Commission as providing adequate level of data protection according to EEA standards -list of these countries is available here: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en#:~:text=The%20European%20Commission%20has%20so,commercial%20organisations%20participating%20in%20the

For transfers from the EEA to countries not considered adequate by the European Commission we have put in place adequate measures such as contractual clauses to protect your Personal Information

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. _

Rights	What does this mean?
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 your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy). 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	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are 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 lists 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.

Alternatively, we may be entitled to refuse to act on the request.

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 contact means 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 here:

Address: Oakstone, Office A30, Arena Business Centre, Holyrood Close, Poole, Dorset, BH17 7FJ

Email: info@oakstone.co.uk

Updates to this Policy

Oakstone review its privacy practices on a regular basis and those practices are subject to change. The date this policy was last revised was: **August 17th 2023**
Any changes to the Policy will be come effective upon posting of the revised Policy on the Internet accessible though the website.