

EXECUTIVE CAREER MANAGEMENT LTD (ECM) PRIVACY POLICY

Who are we?

ECM provides advisory services to individuals seeking to actively manage their careers and to companies engaging ECM on behalf of employees or former employees.

What does this Policy cover?

We at ECM 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 whom 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 deliver to you services associated with career management and transition activities. This information includes CVs, identification documents, educational qualifications, employment history, salary details, consultant interview notes and references.

We do not collect data concerning health, sexual orientation, political opinions, religious and philosophical belief, trade union membership or biometric data.

Where do we collect personal data about you from?

Personal data about you is collected:

- **Directly from you** - this is information you provide for the purpose of contacting you or delivering services such as CV creation or LinkedIn presence creation
- **Through publicly available sources** - including:
 - LinkedIn
 - Press announcements and articles
- **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 create your CV and LinkedIn profile and inform analyses for you that compare you to your peer group.

How long do we keep your personal data for?

We keep your information in accordance as follows:

Service users data: up to a maximum of 5 years from last contact

Potential Service purchaser/Client contact details: up to a maximum of 5 years from last contact

Who do we share your personal data with?

You, we do not share your data with anyone else

What legal basis do we have for using your information?

The legal basis we have for using your information is **Legitimate Interest**

For service users, our processing is necessary for our legitimate interests in that we need the information in order to be able to create CV, LinkedIn profiles and inform analyses for you that compare you to your peer group.

For potential service purchasers/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 complete our services for you.

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

Do we transfer your data outside the EEA?

Where service users are in countries outside the EEA we may transfer your personal data but that is only to you, the service user.

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 (ie 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 by email (paul.cooper@ecm.ltd) or in writing (36 Horam Park Close, Horam, TN21 0HW. United Kingdom)