

LYGON GROUP

Privacy & data protection policy in accordance with the EU General Data Protection Regulation (GDPR)

Introduction and application

Lygon Group gathers and processes data on individuals and companies for the purposes of executive search and for the purposes of executive mentoring.

This policy describes how personal data must be collected, handled and stored in order to meet Lygon Group's data protection standards and to comply with GDPR. Lygon Group takes the privacy rights of individuals, whether members of staff, candidates or clients, seriously and aims to protect them and act with transparency at all times.

This policy protects the rights of staff, candidates, and clients.

Policy scope

This policy applies to all employees of Lygon Group. All Lygon Group employees are data processors. This policy applies to all data that the company holds relating to identifiable individuals.

Third party providers to Lygon Group are required to confirm that they comply with the provisions of GDPR and the terms of this policy as a data processor on Lygon Group's behalf.

Definitions

A data processor is an employee of Lygon Group who is responsible for processing personal data on behalf of the company. Third party IT providers contracted by Lygon Group are also data processors for the purposes of the legitimate services they provide to Lygon Group. Third party providers to Lygon Group are bound by the provisions of this policy and confirm their compliance with it.

A data controller is an employee of Lygon Group who determines the purposes and means of processing personal data. A Partner and Consultant of Lygon Group is a data controller.

The term 'Lygon Group employee' refers to any full or part time member of Lygon Group, whether on a permanent or temporary contract.

Legal basis for processing personal data

Personal data will only be collected and processed by Lygon Group for the legitimate purposes of:

- the execution of an executive or non-executive search
- the provision of mentoring services
- business development activities pursuant to winning search or mentoring

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- assignments
- Lygon Group staff and company administration

Wherever possible, Lygon Group attempts to secure consent from an individual to store and process their data. Consent is sought when an individual writes to a member of staff at Lygon Group pursuant to job opportunities. Individuals are replied to by a named and contactable employee of Lygon Group with an email that seeks explicit approval to retain a copy of their CV on its database so that staff from Lygon Group can contact them about relevant searches at some point in future.

Consent is implied and assumed when an individual actively engages in a search process pursuant to a job opportunity. The fact that their personal data and interest in the appointment is going to be shared with a client is explained explicitly to the candidate.

Categories of personal data

Personal data for the purposes of Lygon Group's legitimate business interests includes:

- Name
- Address/location
- Date of birth
- Gender
- Education
- Work history
- Compensation
- Performance and suitability assessments
- Telephone, email, social media and Skype contact details
- Formal and informal references
- Profile picture sourced online

Lygon Group does not typically process sensitive personal data, such as ethnic origin, political opinions, religious beliefs or physical or mental health. In the event that a client of Lygon Group wishes to see diversity statistics for a search, we will seek a candidate's explicit consent to store this information. Diversity statistics on topics of sensitive personal data will be anonymous when shared with the client and will not be attributable to an individual candidate.

Categories of individuals

Personal data is collected by Lygon Group about:

- potential and actual candidates
- potential and actual clients
- referees, both named and informal
- potential and actual mentors
- employees

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Sources of data

The personal data processed by Lygon Group is sourced via one or more of the following methods:

- Direct telephone, email, online, and in-person contact with the individual in question
- Third party individuals, such as referees
- Public company records, websites and press releases
- LinkedIn
- Subscription databases, such as BoardEx and Capital IQ

Categories of recipients of personal data

Personal data collected for business development, mentoring, and executive search purposes will only be shared on a **need-to-know** basis with:

- Potential and actual candidates
- Potential and actual clients
- Potential and actual mentors
- Individuals employed by Lygon Group

The transfer of personal data to a client outside the EU will only be carried out with the explicit consent of the individual.

Length of time data is retained for

For the legitimate business interests of Lygon Group and its data controllers, personal data about clients and candidates is stored securely indefinitely, unless a candidate requests otherwise. Retaining contact with clients and candidates (prospective or actual), and understanding the course of an individual's career and their respective experiences and personal progression is a critical factor in Lygon Group's ability to carry out its legitimate business interests.

Each time personal data is processed by a Lygon Group employee, that employee will take all reasonable measures to ensure the data is up to date. Measures may include: contacting the individual about whom the data is being processed, accessing databases to which Lygon Group subscribes, and using publically available information.

Data storage and access

Lygon Group stores personal data as follows:

- FileFinder – a licenced internal database to which only Lygon Group employees have access and to which access is password protected
- Hand written records are either securely shredded (via an outsourced provider) or are stored in locked filing cabinets at Lygon Group's offices
- Additional data is stored (documents, emails, and contacts) via Lygon Group's IT system, which includes outlook and a shared drive

Lygon Group employees will have access to personal data stored about candidates and

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clients (actual or potential). Employees access this data via Lygon Group's on-premise IT equipment and mobile devices.

Lygon Group employees must follow comprehensive guidelines regarding the entry and processing of data onto and through FileFinder. FileFinder is licenced from and maintained by Dillistone Systems. Individual personal data may be accessible by Dillistone Systems for the purpose of File Finder maintenance.

Lygon Group outsources its IT management and data security provision to Blue Diamond, which carries out annual assessments of system and data security in-line with GDPR regulations. Individual personal data may be accessible by Blue Diamond for the purpose of its IT service provision.

Other third party providers may have limited access to personal data held and processed by Lygon Group for specific and limited purposes, such as for employee pay roll.

Sharing of personal data outside the EU

In the event that a client of Lygon Group is based outside the EEA (EU member states, and Norway, Iceland and Liechtenstein), personal data will be transferred only if all safeguards in this policy are met. Lygon Group will endeavour to seek consent from individuals before such a transfer.

Rights of access and objection

Individuals about whom Lygon Group processes data are entitled to:

- confirmation that their data is being processed
- access to their personal data
- a copy of Lygon Group's privacy and data protection policy

Individuals who request access to their personal data in writing will be provided with their data within three weeks of their request.

An individual who has reviewed the personal data held on them by Lygon Group has the right to have their personal data rectified within four weeks if it is inaccurate or incomplete, in which instance Lygon Group will inform any third party who has received the data in question of the rectification where possible.

An individual has the right to object to the processing of their personal data at any point by emailing: privacy@lygongroup.com. In that instance, Lygon Group will continue to store their data but will not process it for any purpose. The right to object explicitly forms part of Lygon Group's initial consent request (see above).

An individual has the right to object to the storage of their personal data at any point by emailing: privacy@lygongroup.com. In that instance, Lygon Group will destroy/delete the data stored on the individual unless it is required to retain this information for a period of

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time, such as in the case of a placed candidate or for regulatory purposes. The right to object explicitly forms part of Lygon Group's initial consent request (see above).

Data breaches

In the event of a data breach about which Lygon Group becomes aware, it will report the details of the breach to the Data Commissioners Office within 72 hours, where feasible or as soon thereafter as possible.

How to make a complaint

Individuals can write to Lygon Group's data protection officer with details of their complaint: privacy@lygongroup.com. A written response will be provided after an internal investigation and within 30 days.

Individuals also have the right to raise their concerns with the Information Commissioner's Officer (ICO) at <https://ico.org.uk/concerns>.