

## PRIVACY POLICY

### Who are we?

Zeno Investment Partners is a boutique executive search firm providing retained and contingent recruitment across a diverse range of industries and disciplines in the public and private sectors across the UK and EMEA regions. The business is registered in the UK under Zeno Investment Partners (13361700).

### What does this policy cover?

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
- what personal information do we collect about you?

We collect the information necessary to identify available and relevant opportunities and any additional information needed to assess your eligibility through the different stages of the search process.

This information includes CVs, identification documents, educational records, work history, employment history and references and any other information that is provided by you throughout the course of the search.

We may also collect sensitive personal data about you, in the form of visa status, nationality, gender, and compensation details. We only collect sensitive personal data from you, and further process this data, where you have given your explicit consent.

### 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, or throughout the executive search, consulting solutions, and talent advisory process.

Through publicly available sources. We use the following public sources:

- LinkedIn
- Company websites
- 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.
- Subscribing to a newsletter, filling out a form email, or entering information on our site.

### **How and why do we use your information?**

We use your personal data to match 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 and then pass this on to the client in search of personnel. If you are chosen by the client and go through to the next stage of the process, we will proceed in collecting more information about you at the interview stage and moving forward in the process.

### **How long do we keep your personal data for?**

We only retain your information for as long as is necessary for us to fulfil those requirements outlined above, or to comply with our legal obligations. Please be advised that we may retain some of your information after you cease using our services if this is necessary to meet our legal obligations, for example retaining the information for tax and accounting purposes.

When determining the relevant retention periods, we will consider 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 once this is no longer needed.

Zeno Investment Partners has set a six-year time frame for processing and holding data (beginning May 25th, 2018) as per the AESC official recommendation. If there has been no communication between a data subject and Zeno Investment Partners in more than said time frame, then all records associated with that data subject will be deleted from the database. Zeno Investment Partners plans to review the data retention policy, as well as the six-year retention period for non-communicated data subjects, annually on the anniversary that GDPR came into effect (May 25th, 2019).

### **Who do we share your personal data with?**

Zeno Investment Partners communicates your personal data to clients who wish to hire for a position that may be relevant to you. We may also use that personal data to inform you about key trends in the marketplace that can increase your awareness about your industry. We provide our services to organisations around the world. Personal data that is classified as non-sensitive is also available for viewing by any Zeno Investment Partners employee. We will share information only as outlined within this privacy policy and wherever appropriate, try to limit disclosure to information in aggregated form, to avoid or limit identifying you personally.

We may also conduct checks on you to verify the information you have provided and where we do this we share your information with only the data protection officer.

We may also provide information to third party service providers who process information on our behalf to help run some of our internal business operations including email distribution, IT services and customer services, as well as the Finance & Operations team at Zeno Investment Partners. Where applicable, these 3rd parties will be based within the location relevant to their usage, with the exception of our key 3rd party providers such as IT services and database platform, which are based in the U.K.

### **What legal basis do we have for using your information?**

For prospective candidates, referees and clients, our legitimate interest in your information is driven by the need to assess suitability for potential roles, to find potential candidates, to build insight into our relevant markets, 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, 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. We will always ask for your consent before recording sensitive data.

### **Do we transfer your data outside the EEA?**

Dependant upon the nature of the executive search assignment, your data may be transferred outside of the EEA; importantly the protection offered by the General Data Protection Regulation (GDPR) travels with the data. In the majority of cases this will be to a country where there is a pre-determined adequate level of protection through a European Commission decision ('Adequacy Decision'). In the event that data needs to travel to a country without an adequacy decision, Zeno Investment Partners will either ensure adequate safeguarding of your data as outlined by current [ICO guidelines](#) or seek your express permission to forward your data.

### **Keeping information secure**

We invest significant resources to protect your personal information, from loss, misuse, unauthorised access, modification or disclosure. However, no internet-based site can be 100% secure and so we cannot be held responsible for unauthorised or unintended access that is beyond our control.

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

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

Your Right	Details
<b>The right to be informed</b>	You have the right to be provided with transparent, coherent information about how we use your data and your rights in relation to the use of your data. That is the purpose of this privacy policy.
<b>The right of access</b>	You have the right to obtain access to your information (if we're processing it), and certain other information (like 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.
<b>The right to rectification</b>	You are entitled to have your information corrected if it is inaccurate or incomplete.
<b>The right to erasure</b>	This enables you to request the deletion or removal of your information where there is no compelling reason for us to continue using it. There are exceptions to the right to erasure.
<b>The right to restrict processing</b>	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. A note will be made on your record to ensure the restriction is respected in the future.
<b>The right to data portability</b>	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.
<b>The right to object to processing</b>	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).
<b>The right to lodge a complaint</b>	You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.
<b>The right to withdraw consent</b>	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 will act on requests and provide a detailed report of your information free of charge and will ask that you submit these requests by emailing: [dpo@zeno.partners](mailto:dpo@zeno.partners).

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 will respond within 30 days of the request being sent to: [dpo@zeno.partners](mailto:dpo@zeno.partners). If it will take longer to process your request, we will inform you accordingly.

### **Third-party disclosure**

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information.

### **Third-party links**

We do not include or offer third-party products or services on our website.

### **Updates**

We keep this Policy under regular review and update it from time to time. Please review this policy periodically for changes.

### **How will we contact you?**

We may contact you by phone, email or social media. If you prefer one contact means over another, please 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:

Data Protection Officer, Zeno Investment Partners  
[dpo@zeno.partners](mailto:dpo@zeno.partners).