

## **Edenbrook Partners Limited**

### **Privacy Notice**

#### **INTRODUCTION**

Welcome to Edenbrook Partner's privacy notice.

Edenbrook Partners respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from), how we will use your personal data generally and tell you about your privacy rights and how the law protects you.

Please use the Definitions to understand the meaning of some of the terms used in this privacy notice.

#### **1. IMPORTANT INFORMATION AND WHO WE ARE PURPOSE OF THIS PRIVACY NOTICE**

This privacy notice aims to give you information on how Edenbrook Partners collects and processes your personal data through (i) your use of this website and (ii) more generally, including any data you may provide through this website when you contact us via our website, send us your CV or generally engage us in your job search. This website is not intended for children and we do not knowingly collect data relating to children. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### **CONTROLLER**

Edenbrook Partners Limited is the controller and responsible for your personal data (collectively referred to as "Edenbrook Partners", "we", "us" or "our" in this privacy notice). If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

## CONTACT DETAILS

Our full details are: Full name of legal entity: Edenbrook Partners Limited Email address: [karl@edenbrookpartners.com](mailto:karl@edenbrookpartners.com) or [patrick@edenbrookpartners.com](mailto:patrick@edenbrookpartners.com) Postal address: St Magnus House, 3 Lower Thames Street, London EC3R 6HE You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

**CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES** We reserve the right to amend this privacy notice and will notify you by updating this notice, so please check it from time to time, especially if you have on-going dealings with us. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

**THIRD-PARTY LINKS** This website may include links to third-party websites, plugins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, marital status, title and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes bank account details for contractors.
- **Transaction Data** includes details about payments to contractors.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to suspend a service you have with us but we will notify you if this is the case at the time.

## IF YOU FAIL TO PROVIDE PERSONAL DATA

- We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - contact us via our website or otherwise;
  - send us your CV;
  - respond to a job advert;
  - request a job specification to be sent to you; or
  - give us some feedback.
- **Third parties or publicly available sources.** We may obtain personal data about you from third parties and public sources such as from search information providers (such as LinkedIn and Reed).

#### 4. HOW WE USE YOUR PERSONAL DATA

**We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:**

- Where we need to perform the contract we are about to enter into or have entered into with you, such as, for example, placing contractors on projects and administering payments.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [Contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.
- We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a candidate on our database	(a) Identity	(a) Performance of a contract with you
	(b) Contact	(b) Necessary for our legitimate interests (to add you to our database)

to find suitable roles for candidates and contractors)

To perform contractual obligations for you, including collecting and paying money to contractors	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to pay contractors)
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Asking you to leave feedback or testimonials	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Usage	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website content and notifications to you and measure or understand the effectiveness of the communications we provide to you	(a) Identity (b) Contact (c) Profile (d) Usage  (e) Marketing and Communications	Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website,	(a) Usage	Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated

marketing, customer relationships and experiences (b) Marketing and Communications and relevant, to develop our business and to inform our marketing strategy)

To make suggestions and recommendations to you about prospective jobs and employers that may be of interest to you (a) Identity (b) Contact (c) Usage Necessary for our legitimate interests (to develop our services and to present suitable roles to you)

## **MARKETING**

We may use your Identity, Contact, Technical and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which job roles may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details and, in each case, you have not opted out of receiving that marketing.

## **THIRD-PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with any company outside Edenbrook Partners for marketing purposes.

## **OPTING OUT**

You can ask us or third parties to stop sending you marketing messages at any time by [Contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to you as a result of a contract you have entered into with us.

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [Contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **DISCLSURES OF YOUR PERSONAL DATA**

**We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.**

- External Third Parties as set out in the Definitions.
- Other third party sub-contractors who provide services for us and/or help to provide services to you. In the event that we use sub-contractors who have access to your personal data, we ensure that there are strict contractual terms in place to ensure that they only process personal data to the extent that we instruct them to do so in writing and there are suitably worded confidentiality and data protection clauses in all such contracts.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **INTERNATIONAL TRANSFERS**

- We do not transfer personal data outside of the European Economic Area (**EEA**).

## **DATA SECURITY**

- **We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.**

## **DATA RETENTION HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **YOUR LEGAL RIGHTS**

**Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:**

**Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.**

**Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.**

**Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.**

**Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.**

**Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.**

**Request the transfer of your personal data to**

you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

1. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.
2. **TIME LIMIT TO RESPOND**
3. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
4. **WHAT WE MAY NEED FROM YOU**
5. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances

## **NO FEE USUALLY REQUIRED**

If you wish to exercise any of the rights set out above, please [Contact us](#).

## **DEFINITIONS LAWFUL BASIS**

- **Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [Contacting us](#).** Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract. Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## **THIRD PARTIES EXTERNAL THIRD PARTIES**



- Prospective employers, however we would only send a copy of your CV if you give us permission to do so.
- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Any court of competent jurisdiction or any regulatory, judicial, governmental or similar body of competent jurisdiction.

By accepting details of, interviewing, or engaging any candidate introduced by Edenbrook Partners Limited, the Client agrees to be bound by our standard Terms of Business, unless otherwise agreed in writing by an authorized representative of Edenbrook Partners Limited. The Client acknowledges and agrees that it has sole responsibility to satisfy itself that the candidate has the required qualifications and integrity of character in order to provide the required services.