SABIO SEARCH LIMITED

Privacy Notice

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

# Key terms

It would be helpful to start by explaining some key terms used in this policy:

|  |  |
| --- | --- |
| Personal data | Any information relating to an individual or identifiable individual |
| Special category personal data | Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership  Genetic and biometric data  Data concerning health, sex life or sexual orientation |

# Who we are

Sabio Search Limited (Company Number 11256388) whose registered office is at 11 Addison Avenue, London W11 4QS collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the [General Data Protection Regulation](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN) which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

# The personal information we collect and use

## **Information collected by us**

In the course of delivering our recruitment services, we collect the following personal information when you provide it to us:

* names (either of persons requesting our recruitment services or of potential candidates);
* address;
* telephone numbers;
* email address;
* CV or profile, including work history and qualifications;
* details of remuneration of potential candidates including details of salary, bonus (historic and deferred), any share option schemes and details of when these will vest (unless you are a candidate who is resident in New York State in the United States of America when we will not collect this information unless specifically requested by our client);
* notice period in respect of a potential candidate’s current employment;
* a potential candidate’s corporate grade;

## **Information collected from other sources**

We also obtain personal information from other sources as follows:

* names of potential candidates suggested to us by third parties;
* work profiles of potential candidates including work history and qualifications collected from publicly available sources such as LinkedIn and Bloomberg;
* contact details including email address and telephone number of potential candidates obtained from third parties who suggest potential candidates to us;

## **How we use your personal information**

We useyour personal information to*:*

* provide our services to you;
* comply with our legal obligations;
* updating our client records;
* statistical analysis to help us manage our business;
* marketing our services;
* statutory returns;
* external audits and quality checks;
* promote our business.

## **Who we share your personal information with**

We routinely share personal information with:

* third parties we use to help us run our business, e.g. website hosts, cloud hosting services and email service providers;
* our bank;
* our accountants and other professional advisers.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

## **Whether information has to be provided by you, and if so why**

The provision of your personal data referred to above is required from you to enable us to provide our services to you. We will inform you at the point of collecting information from you, what information you are required to provide to us.

## **How long your personal information will be kept**

We will hold your personal data for the period we are required to retain this information by applicable UK tax law (currently 6 years)

## **Reasons we can collect and use your personal information**

We rely on legitimate business interest as the lawful basis on which we collect and use your personal data. Our legitimate interests are:-

* for the performance of our contract with you or to take steps at your request before entering into a contract;
* making sure we provide you with the best possible service;
* making sure we keep in touch with our clients about existing and new services;
* promoting our business;
* to comply with our legal and regulatory obligations.

The above does not include special category data which we do not anticipate having to collect. However, if in a particular circumstance it is necessary to collect any special category data we will inform you at the time and only process such special category data with your consent.

# Transfer of your information out of the EEA

We may transfer your personal information to the following which are located outside the European Economic Area (EEA) as follows:

* personal details of potential candidates to our clients in the USA in order for our client to consider a potential candidate in respect of a job vacancy
* personal details of potential candidates to our clients in Hong Kong in order for our client to consider a potential candidate in respect of a job vacancy

Certain countries do not have the same data protection laws as in the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal data will be secure. Our standard practice is to use standard data protection contract clauses which have been approved by the European Commission.

# Your rights

Under the [General Data Protection Regulation](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN) you have a number of important rights free of charge. In summary, those include rights to:

* fair processing of information and transparency over how we use your use personal information
* access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
* require us to correct any mistakes in your information which we hold
* require the erasure of personal information concerning you in certain situations
* receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
* object at any time to processing of personal information concerning you for direct marketing
* object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
* object in certain other situations to our continued processing of your personal information
* otherwise restrict our processing of your personal information in certain circumstances
* claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner’s Office (ICO) on individuals rights under the General Data Protection Regulation](http://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/).

If you would like to exercise any of those rights, please:

* email, call or write to **u**s
* let us have enough information to identify you e.g. full name, address
* let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
* let us know the information to which your request relates

# Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

# How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at [https://ico.org.uk/concerns/](http://ico.org.uk/concerns/) or telephone: 0303 123 1113.

# Changes to this privacy notice

This privacy notice was published on 8th March 2021.

We may change this privacy notice from time to time, when we do we will inform you via our website.

# How to contact us

Please contact us if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact us, please send an email to dgarlick@sabiosearch.co.uk, write to 11 Addison Avenue, London W11 4QS or call +44 7968 204422.