



Privacy Policy      April 2020

## Contents

### CLAUSE

1.	Important information and who we are	3
2.	The data we collect about you	5
3.	How is your personal data collected?	6
4.	How we use your personal data	7
5.	Disclosures of your personal data	11
6.	International transfers	11
7.	Data security	12
8.	Data retention	12
9.	Your legal rights	13
10.	Glossary	14



## Introduction

**Welcome to the Cara Executive Search privacy policy.**

Cara Executive Search respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and where we otherwise obtain or collect information about you. This policy will tell you about your privacy rights and how the law protects you. We are committed to protecting the data provided to us in compliance with all applicable laws and regulations relating to the processing of personal data and privacy, including the Data Protection Act 2018 and the General Data Protection Regulation.

This Privacy Policy is effective from 20th April 2020. This privacy notice may change from time to time so please re-visit this page occasionally to ensure that you are happy with any changes.

This privacy notice applies to personal information provided by our clients and suppliers about their employees and other individuals affiliated with them, and also to candidates or prospective candidates for roles with the clients or prospective clients of Cara Executive Search.

Cara Executive Search is the controller of personal data when individuals and clients engage with us to access our services; this means that we decide why and how individuals' personal data is processed.

Cara Executive Search will also on occasion act as the processor of personal data when our clients have shared individuals' information with us in the course of providing our services to them.

Cara Executive Search is registered with the Information Commissioner under registration number ZA751969.

Please use the Glossary to understand the meaning of some of the terms used in this privacy policy.

## 1. Important information and who we are

### **Purpose of this privacy policy**

This privacy policy aims to give you information on how Cara Executive Search collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, purchase a product or service or take part in a competition or instruct us to act on your behalf. This website is not intended for children and we do not knowingly collect data relating to children. The privacy policy also gives you information on how Cara Executive Search collects and processes your personal data which we may receive from you directly, or from third parties when we are carrying out our services.



It is important that you read this privacy policy together with any other privacy policy or fair processing policy 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 policy supplements other notices and privacy policies and is not intended to override them.

### **Controller**

Cara Executive Search is the controller and responsible for your personal data (collectively referred to as Cara Executive Search, "we", "us" or "our" in this privacy policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

### **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Cara Executive Search Ltd

Company number: 12569167

Email address: [info@caraexecsearch.com](mailto:info@caraexecsearch.com)

Postal address: Kemp House, 160 City Road, London, United Kingdom, EC1V 2NX

Telephone number: +44 (0)203 288 5271

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 policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was last updated on 30th April 2020. Where applicable, historic versions can be obtained by contacting 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, plug-ins 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 policy 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 as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Other Data** includes Curriculum Vitae information, social media information, company name or business name (if applicable), VAT number (if applicable) and engagement history. We also collect information such as work experience, education history, job title, current salary and compensation information (as well as future expectations) and previous, current and future employment details.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect



Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

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.

### **If you fail to provide personal data**

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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## **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, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, social media, via our website or otherwise. This includes personal data you provide when you:
  - make an enquiry to Cara Executive Search
  - engage us to provide talent consultancy services
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us feedback or contact us
  - our research – from sources in the public domain including corporate websites, newswires, public databases and social media platforms like LinkedIn and Facebook
  - our clients and third parties – when a client provides information about a candidate or potential candidate
  - our network – when a source recommends that we consider an individual for a position we are seeking to fill on behalf of a client
  - other people – employers or colleagues who may provide a reference on an individual to us, subject to that individual's consent where required by law.



- The information that we receive about individuals from others mainly includes employment information, biographical, and education information but this list is non-exhaustive.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and/or server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
- Technical Data from the following parties:
  - (a) analytics providers such as Google based outside the EU;
  - (b) advertising networks based inside or outside the EU; and
  - (c) search information providers based inside or outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside or outside the EU.
- Identity and Contact Data from data brokers or aggregators based inside or outside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

## 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.
- 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 obligation.
- to enter into and perform the contract we have with our clients
- to identify relevant individuals to present to our clients to fulfil our services to them
- to identify professional opportunities that we think may be of interest to individuals whom we may contact regarding such opportunities
- to evaluate individuals' suitability for specific roles our clients are seeking to recruit for
- to contact individuals for introductions to clients or candidates and our broader network in connection with a project that we are undertaking and for purposes of market intelligence, with no hidden incentive
- for benchmarking, trend analysis and industry insight purposes



- to report public domain published industry news and people moves within financial services
- for record-keeping related to a service we provide
- to assess and improve our service to clients
- to undertake analysis to inform our business and service strategy
- to manage and deliver internal projects for business improvement
- for network and information security purposes to enable us to take steps to protect personal data against loss or damage, theft or unauthorised access
- to comply with a request from individuals in connection with the exercise of their rights (for example, where we have been asked not to contact individuals for marketing purposes, we retain a record of this on our suppression lists in order to be able to comply with such requests)
- to assist in the management of queries, complaints or claims
- for the prevention of fraud and other criminal activities.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Where individuals have given us their consent, we will submit CVs to our client in relation to the relevant role that individuals have expressed an interest in. Our clients may on occasion also ask us to seek an individual's consent to them holding the individual's data in order that they can interact directly.

We may also contact colleagues or former employers in relation to obtaining references regarding individuals' suitability for a potential role, where individuals have consented to such contact.

Individuals on whom we hold personal data have the right to withdraw consent at any time. Please see below for further details.

### **Special categories of personal data**

Cara Executive Search does not request or consider information concerning religion, sex life or political opinions or any other individual characteristics which may be "protected" by law in connection with its services, but we may ask individuals to voluntarily supply this data for diversity and inclusion monitoring purposes.

We may perform candidate background checks, and may process other sensitive personal data, such as citizenship or nationality information, or health information, when relevant for a position and permitted by law.

If you have a disability and would like us to organise reasonable adjustments for your engagement with our client, you may provide that information to us.



If we intend to collect sensitive personal data on individual/s from third parties, we will provide relevant notice and will only collect this information with the individual's consent.

### **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile 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 products, services and offers 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 goods or services from us and you have not opted out of receiving that marketing.

### **Third-party marketing**

We will never share personal data with third parties for their own marketing uses, although we may use service providers to assist us with our own marketing.

### **Our clients**

Cara Executive Search will transfer personal data concerning potentially suitable candidates to clients who have engaged our services.

Cara Executive Search's clients comprise of global financial services organisations. Accordingly, personal data may be transferred outside of the EEA. Those countries may not have the same standards of data protection and privacy laws as the UK, which means additional safeguards must be put in place. Whenever we transfer personal data outside of the EEA, we impose contractual obligations on the recipients of that data to protect personal data to the standard required in the UK.

We may also require the recipient to subscribe to appropriate safeguards as specified under Article 46 GDPR intended to enable secure data sharing, including:

- binding corporate rules in accordance with Article 47 GDPR
- standard data protection clauses adopted by the European Commission from time to time, or
- standard data protection clauses adopted by a Data Protection Authority and approved by the European Commission.



### **Our suppliers and service providers**

We may also transfer personal data to external providers performing certain services for Cara Executive Search, for example a database provider. Such service providers have access to personal data solely for the purposes of performing the services specified in the applicable service contract, and we have an agreement in place that requires them to keep this data secure and not to use it other than in accordance with our specific instructions.

### **Other ways in which we may share personal data**

Cara Executive Search may be required to disclose certain personal data to other third parties:

1. as required by law;
2. to protect Cara Executive Search's legal rights to the extent authorised or permitted by law; or
3. in an emergency where the health or safety of a candidate or other individual may be endangered.

In addition, in the event of a re-organisation, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of Cara Executive Search's business, we may transfer personal data to successor entities or parties.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at [info@caraexecsearch.com](mailto:info@caraexecsearch.com).

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service, warranty registration, product/service experience or other transactions.

### **Cookies**

Cookies are text files which identify a user's computer to our server. Cookies in themselves do not identify the individual user, just the computer used. Cookies help us identify which pages of our website are most visited. This information can be used to help us improve our website and ensure we provide the best service. We only use this information for statistical analysis purposes and it will be aggregated or anonymised i.e. it will not identify individual users of our website. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

### **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.

## 5. Disclosures of your personal data

We may share your personal data with the parties for the purposes set out in this policy.

- Internal Third Parties.
- External Third Parties.
- 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 policy.

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.

## 6. International transfers

Cara Executive Search's clients comprise of global financial services organisations, Accordingly, personal data may be transferred out of the European Economic Area (EEA). Those countries may not have the same standards of data protection and privacy laws as the UK, which means additional safeguards must be put in place. Whenever we transfer personal data outside of the EEA, we impose contractual obligations on the recipients of that data to protect personal data to the standard required in the UK. We may also require the recipient to subscribe to appropriate safeguards as specified under Article 46 GDPR intended to enable secure data sharing, including: binding corporate rules in accordance with Article 47 GDPR; standard data protection clauses adopted by the European Commission from time to time, or standard data protection clauses adopted by a Data Protection Authority and approved by the European Commission.



## 7. 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.

### Links to other websites

Our website may contain links to other websites of interest. However, once you have accessed these links to leave our site, we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information provided by an individual whilst visiting such sites and such sites are not governed by this privacy notice. You should exercise caution and look at the privacy statement applicable to the website in question.

## 8. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

The length of time for which we retain personal data is determined by a number of factors including the type of data, the purpose for which we use that data and our regulatory and legal obligations attached to this use. We will keep personal data throughout the period of an individual's relationship with us and whilst we are providing that individual with our services. Once our relationship with an individual has ended, that individual's personal data may still be relevant for our current or future legitimate business purposes, for example we may retain information for our business records; to be able to establish, exercise or defend our



legal rights; to show that we are compliant with applicable laws; or to show that we have fulfilled or continue to fulfil our obligations towards our clients.

Where required by law, we may have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers.

Typically, we will keep personal data on our database for seven years from our last interaction with that individual.

The only exceptions to this are where:

- The law requires us to hold personal data for a longer period, or delete it sooner
- An individual exercises their right to have the data erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law.

When we no longer need to retain an individual's information, we will ensure it is securely disposed of, at the appropriate time.

In some circumstances you can ask us to delete your data.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

If you wish to exercise any of these rights, please contact us at [info@caraexecsearch.com](mailto:info@caraexecsearch.com)

### **No fee usually required**

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 could refuse to comply with your request in these circumstances.

### **What we may need from you**

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.



### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.

## 10. Glossary

### 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 such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

### THIRD PARTIES

#### Internal Third Parties

Other companies in the Cara Executive Search group acting as joint controllers or processors and who are based in the UK and provide IT and system administration services and undertake leadership reporting.

#### External Third Parties

- Service providers acting as processors based in the United Kingdom who provide IT and system administration and database services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.



## YOUR LEGAL RIGHTS

You have the right to:

**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:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- 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.
- 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.

### Contact us

Please direct any queries about this notice or about the way we process personal data in writing to:

Cara Executive Search, Kemp House, 160 City Road, London, United Kingdom, EC1V 2NX; or by email to [info@caraexecsearch.com](mailto:info@caraexecsearch.com). If you would prefer to speak to us by phone, please call +44 (0)203 488 5271.

