

## PRIVACY POLICY

### Who are we?

Travis Research Europe Ltd, Unit 25 Silk Mill Business Park Brook Street Tring  
Hertfordshire HP23 5EF T: + 44 1442 828846

E: [sarah@travisresearch.co.uk](mailto:sarah@travisresearch.co.uk)

Travis Research provides;  
Executive research and search solutions, market intelligence and market and/or talent mapping.

We are committed to protecting the privacy of our candidates, clients and users of our website. We want to provide a safe and secure service where we deal with your personal information. This means information that identifies you personally such as your name, photo or contact details or data that can be linked with such information in order to identify you.

This Policy complies with General Data Protection Regulation (GDPR) and was updated on 14<sup>th</sup> May 2018. We may update this Policy and any updates will be shown on this document.

## Quick Guide to Contents

1. What personal information do we collect about you?
2. Where do we collect personal information about you from?
3. How do we use your personal information?
4. How long do we keep your personal information for?
5. Who do we share your personal information with?
6. What happens if you do not provide us with the information we request?
7. Do we make automated decisions concerning you?
8. Do we transfer your personal information outside the EEA?
9. What are your rights?
10. How do we contact you?
11. How do you contact us?

1. What personal information do we collect about you?

We collect the information necessary to be able to find available opportunities and further information needed to assess your eligibility through the different stages of recruitment. This information includes your name, contact details, family details, CV's, identification documents, educational records, work history, employment status and references.

We sometimes also collect sensitive personal information about you, such as details of criminal convictions and ethnic origin. We only collect sensitive personal information from you, and further process this data, where you have given your explicit consent or otherwise where permitted by law.

## 2. Where do we collect personal information about you from?

The following are the different sources we may collect personal information about you from:

- **Directly from you.** This is information you provide while searching for a new opportunity (for example when you provide a CV) and/or during the different recruitment stages.
- **From an agent/third party acting on your behalf.**
- **Through publicly available sources.** We use a range of public sources including:
  - LinkedIn
  - Google
  - Facebook & twitter
  - Company web sites and other social media platforms
  - Membership associations, clubs, events such as conferences, workshops & seminars
  - Press and public available sources
- **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.
- For all information gathered and retained we use reasonable efforts to ensure that the data is accurate and current. We use appropriate measures to safeguard all data, physical personal data is locked away and all other personal data held on IT equipment is secured and password protected.

## 3. How do we use your personal information?

- **Where we have a legitimate interest**
  - Any data we collect and process as part of our services or from you directly will only be used in relation to our executive research and search assignments or projects.
  - When undertaking further assignments or projects where you have provided us with personal information we will confirm that you are in agreement to use that data should we consider you to be relevant for the role.
  - We use certain personal data to determine which candidates might be worth approaching for a particular role. This is necessary for our legitimate interests as a research and search company. We do not use any sensitive personal data without ensuring we have another basis for such processing.
  - We may use your personal information with a client or to show a profile within the context of the assignments or projects.
  - Your personal information may be used in an anonymised form as part of market analysis and statistical report without identifying the data subject.
  - By providing your personal information and/or CV you indicate your willingness to be considered for suitable roles.

#### **4. How long do we keep your personal information for?**

We keep your information for the following periods: As a general rule we would retain personal data for no longer than 10 years, after which it would be destroyed if it is no longer required for the purpose for which it was obtained.

#### **5. Who do we share your personal information with?**

We share your personal information with the client who has a position to fill and/or with the search consultant seeking to fill a position with the client in order to determine with the client whether you are a good fit for the available position.

We share your personal information with trusted third parties where we have retained by them to provide services that you or our clients have requested, such as referencing, qualification and criminal reference checking services (as required), verification of the details you have provided from third party sources, psychometric evaluations or skills tests. These third parties comply with similar and equally stringent undertakings of privacy and confidentiality.

We share your personal information with third parties who perform functions on our behalf and who also provide services to us, such as professional advisors search and research consultants IT consultants carrying out testing and development work on our business technology systems. These third parties comply with similar and equally stringent undertakings of privacy and confidentiality.

Where required we share your personal information with third parties to comply with a legal obligation; when we believe in good faith that an applicable law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce our Terms of Use or other applicable policies; to detect and protect against fraud, or any technical or security vulnerabilities; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to the our website, our business or the public.

#### **6. What happens if you do not provide us with the information we request or ask that we stop processing your information?**

If you do not provide the personal information necessary, or withdraw your consent for the processing of your personal information, where this information is necessary for us to provide recruitment services to you, we may not be able to match you with available job opportunities.

#### **7. Do we make automated decisions concerning you?**

We do not carry out automated decision making.

## 8. Do we transfer your personal information outside the EEA?

We sometimes transfer your personal information outside the EEA when we are retained on assignments to fill a role based with a client outside of the EEA or to an international client. We operate in Countries of which the ICO has made a “positive finding of adequacy”

## 9. What are your rights?

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

### Rights

### What does this mean?

1. The right to object to processing	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).
2. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.
3. The right of access	You have the right to obtain access to your information (if we're processing it), and certain other information (similar to 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.
4. The right to rectification	You are entitled to have your information corrected if it's inaccurate or incomplete.
5. The right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.

6. The right to restrict processing	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. We keep lists of people who have asked for further use of their information to be ‘blocked’ to make sure the restriction is respected in future.
7. The right to data portability	You have rights to obtain and reuse your personal information 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.
8. The right to lodge a complaint	You have the right to lodge a complaint about the way we handle or process your personal information with your national data protection regulator.
9. The right to withdraw consent	If you have given your consent to anything we do with your personal information, 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 information with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal information for marketing purposes.

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’ll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we’ll come back to you and let you know.

#### 10. How do we contact you?

We may contact you by phone, text, whatsapp email or social media. If you prefer a particular contact means over another please advise us accordingly.

#### 11. How can you contact us?

If you have any enquires you can contact us at: [sarah@travisresearch.co.uk](mailto:sarah@travisresearch.co.uk) or write to us at the address shown below.

Name: Sarah El-Rasoul  
Data Protection Officer  
Information Commissioner's Office registered number: Z1586407  
Travis Research Europe Ltd  
Unit 25 Silk Mill Business Park  
Brook Street  
Tring, Herts  
HP23 5EF