



Signium Sweden

Privacy Policy

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Signium

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Who are we?

Signium Sweden, Nybrogatan 34, Stockholm, Järntorget 2, Gothenburg and Kärleksgatan 2A, Malmö, Sweden. We provide executive search and recruitment services to clients looking to recruit personnel for their businesses. We also provide coaching, assessments, market reports, salary surveys and consulting services for candidates and clients.

What does this policy cover?

We at Signium Sweden take your personal data seriously. 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
- explains how we may contact you and how you can contact us.

The principles described in this Privacy Policy document are handled in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). The aim of these principles is to provide participants with basic information on the processing of Personal Data, their protection and methods of processing.

When transmitting and processing your Personal Data, we strictly follow the applicable codes (the code of conduct) of the Association of Executive Search and Leadership Consultants (AESC).

Please find the complete version of these documents at the following addresses:

<https://www.aesc.org/profession/professional-code>
<https://www.aesc.org/profession/candidate-bill-rights>

What personal data do we collect about you?

We collect the information necessary to be able to carry out the work our clients ask us to deliver. This information may include, but not be limited to, CVs, identification documents, educational records, work history, employment, remuneration details and references.

We may also collect sensitive personal data about you, in the form of bank details, work permit, driving license, criminal records, remuneration and compensation, identifications documents, education records. 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 you are engaged with us as part of a search/recruitment process or via coaching.
- **Through publicly available sources.** We use the following public sources, as well as others from time to time:
 - LinkedIn
 - Company website
 - Company annual reports
- **By Reference or word of mouth.** For example, you may be recommended by a friend, a former employer, a former colleague, telephone referencing or even a present employer.

How do we use your personal data?

We use your personal data to help us deliver our services on behalf our clients and to assist you in the development of your career.

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 as part of our search activities for a particular recruitment project. If you are chosen by us to be assessed more deeply you will go through to the next (interview) stage and onwards in that manner. At some point we will share information about you with our client.

If we undertake a reference/due diligence exercise the data supplied will be passed to our client. Sources may at times be anonymized.

Where do we store your personal data?

We store your Personal Data in our Database, which is provided by an external Processor, which maintains the utmost secure internal systems and storage for us. The security of our systems is provided by our suppliers, who may also have access to your Personal Data. To prevent any unauthorized processing or a processing you could not have expected, the activity of these suppliers is under permanent control while they are bound by the contractual terms and the processing contracts.

How long do we keep your personal data for?

We only retain your information for as long as is necessary for us to use your information as described above or to comply with our legal obligations. However, please be advised that we may retain some of your information after you cease to use our services, for instance if this is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.

When determining the relevant retention periods, we will take into account 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) statute of limitations under applicable law(s);
- d) (potential) disputes;
- e) if you have made a request to have your information deleted; and
- f) guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information once this is no longer needed.

Who do we share your personal data with?

We share your personal data with the client we are working with and on whose behalf we will have approached you or the client who has a position to fill, in order to determine with the client whether you are a good fit for the available position.

We may also, if we think it is beneficial to you, share your data within the Signium group internationally.

With your prior permission, we may also share your personal data with selected external contacts where we think there may be interesting career development opportunities available to you.

We may also conduct checks on you to verify the information you have provided and where we do this we may share this information with our clients and staff.

What legal basis do we have for using your information?

For prospective candidates, interim managers, referees and clients, our processing is necessary for our legitimate interests in that we need the information in order to be able to assess suitability for potential roles, to find potential candidates and to contact clients and referees.

If you are shortlisted as a candidate or we are working closely with you in an assessment of development process, 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. In that case, we always ask for your consent before undertaking such processing.

For clients, we may also rely on our processing being necessary to perform a contract for you, for example in contacting you.

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 data necessary, or withdraw your consent for the processing of your personal data, we may not be able to work with you on potential assignments.

Do we make automated decisions concerning you?

No, we do not in general, make automated decisions about you but as part of our determination of suitability for a specific role, we at times and with a candidate's prior explicit permission, include assessment/psychometric profiling, which may be completed online. Results will always be assessed and analysed by trained and certified consultants. Feedback is always given to candidates before presenting the result of the assessment to our client and so no solely automated decisions will be made.

Do we use Cookies to collect personal data on you?

No, we do not use cookies to collect personal data.

Do we transfer your data outside of the EU?

To better help you we may transfer your personal data to clients and partners in countries outside the EU. These countries privacy laws may be different from those in your home country. Where we transfer data to a country which has not been deemed to provide adequate data protection standards we always have security measures and approved model clauses in place to protect your personal data. To find out more about how we safeguard your information as related to transfers contact us directly.

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

By law, you have a number of rights when it comes to your personal data. 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 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.
2. The right of access	<p>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).</p> <p>This is so you're aware and can check that we're using your information in accordance with data protection law.</p>
3. The right to rectification	You are entitled to have your information corrected if it is inaccurate or incomplete.
4. 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.
5. 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.
6. The right to data portability	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.

7. 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).
8. The right to lodge a complaint	You have the right to lodge a complaint about the way we handle or process your personal data 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 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 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.

How will we contact you?

We may contact you by phone, email or social media. If you prefer a particular contact means over another please just 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 directly at info@signium.se.