



GLOBAL PRIVACY STATEMENT

1. INTRODUCTION:

- 1.1 Senior Leaders Limited, (company number 10855358) is a company registered in England and Wales, (trading as, 'Senior Leaders' and or 'A Fifth Space'), and is committed to providing both confidentiality and privacy in a responsible manner.
- 1.2 This Privacy Policy applies to information that; Senior Leaders Limited (trading as, 'Senior Leaders' and or 'A Fifth Space'), and its affiliates and subsidiaries (collectively "**Senior Leaders Limited**", "**Senior Leaders**", "**A Fifth Space**", "**we**", "**us**", "**our**") collect, uses, transfers and discloses your information in connection with our Recruitment Services, Consulting and Advisory Services and Coaching Services.
- 1.3 This Policy also covers information collected through:
 - Website(s) we operate from which you are accessing this policy (the "Site(s)"), including, www.senior-leaders.com and or www.afifthspace.com and or other affiliated company websites.
 - Our social media pages and apps to which the Site links (collectively, our "Social Media Pages").
 - The software applications we make available for use on or through computers or mobile devices (the "Apps").
 - Communication through email messages (HTML formatted or otherwise) we send to you, that link to this Policy (collectively, including the Site, Apps and our Social Media Pages, the "Online Systems").
 - It explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we store and handle that data and keep it safe. It also tells you about your privacy rights including your right to object.

2. WHO WE ARE:

- 2.1 Senior Leaders Limited, (trading as, 'Senior Leaders' and or 'A Fifth Space'), is a company registered in England and Wales. Company Number 10855358.
- 2.2 Senior Leaders Limited is a company that provides executive and contingent search services on an international basis. We assist organisations to recruit new personnel and attract talent ("Recruitment Services"). We provide Recruitment Services to clients who are searching for talent at; Board, Chief Executive, senior executive, mid and upper management levels.
- 2.3 Senior Leaders Limited also offers services of consulting and advisory on an international basis. ("Consulting and Advisory Services"). We help clients to develop and implement their HR and Talent business strategies on a project-by-project or ongoing basis.
- 2.4 Senior Leaders Limited also provides coaching, ("Coaching Services"). We provide our coaching services for transformational development to organisations and individuals across a wide industry spectrum and on an international basis.
It is possible that our client maybe your employer or an organisation with which you are seeking employment.

2.5 OUR CONTACT DETAILS

email at: contact@senior-leaders.com

Our head office address is:

Level 18
40 Bank Street
Canary Wharf
London
E14 5NR
United Kingdom

Our registered office address is:

7-8 Ritz Parade
Western Avenue
London
United Kingdom
W5 3RA

3. OVERVIEW OF THIS NOTICE:

- 3.1 Senior Leaders Limited is committed to safeguarding your personal information and complies with United Kingdom law and with current data protection legislation including GDPR. We will not sell, distribute, lease or disclose your personal information to third parties, unless we have your written permission or are required to do so by law.
 - Who is gathering your information?
 - The information we gather.
 - The information we collect.
 - What we do with the information we gather and why.
 - Security.
 - Cookies.
 - How long we retain your information.
 - Controlling your personal information.
 - Links to other websites.
 - Changes to this Privacy Notice.

4. WHO IS GATHERING YOUR INFORMATION?

- 4.1 When you use virtual content stored on www.senior-leaders.com and or www.afifthspace.com domain names, or communicate with us via email Senior Leaders Limited is collecting data about your activity on the system and contact details if you provide them.
- 4.2 Senior Leaders Limited is the data controller.
- 4.3 The company's Data Protection Officer is contactable via: contact@senior-leaders.com
See below for more specific information on how we use the data and why.

5. THE INFORMATION WE GATHER:

- 5.1 Senior Leaders Limited will only process your personal information where we have a lawful basis to do so.
- 5.2 We always restrict the information we collect to what is necessary to provide you with the service you require. The lawful basis for processing your information may differ depending on which of our digital services you use and on the situation to which you require our services.
- 5.3 In most cases we will only process your data on the following basis:
 - You have given consent for the processing. **When we rely on consent to process your personal information, you always have the right to withdraw this consent.**
 - The processing is necessary for the performance of a contract with you or your employer or to make contact with you or inform you of our services.
 - The processing is necessary for compliance with a legal obligation placed upon us.
 - The processing is necessary for the purposes of legitimate interests. For example, we have a legitimate interest in understanding how people are using the resources we provide, both to improve them and to understand and analyse use of our products and services.
 - Some data may be processed outside of the UK. Where this happens, we will ensure that it is given the same levels of protection as required under the UK Data Protection Act and General Data Protection Regulation (GDPR).

6. THE INFORMATION WE COLLECT:

- 6.1 We only collect identifiable personal data or information that you voluntarily provide to us in order to:
 - Notify you about changes to our service
 - Register access for certain areas of the site(s)
 - Gain access gated resources
 - Enquire for more information from us



- Sign up to our distribution list
- Supply us with more information outside of a request
- Allow you to communicate with us through email and or the, 'Contact Us' section of the website, www.senior-leaders.com and or www.afifthspace.com. Your messages will contain your name or user name, email address, as well as any additional information you may wish to include.

6.2 Recruitment Services - Candidates:

- a) In the course of our Recruitment Services, we may collect the following types of information about you as a potential candidate: i.e., name, address, telephone number, e-mail address, CV information, (however as we work on a search basis, we do not collect cv's onto a database.) Where permitted by law, we may also collect information relating to your health (for example, disability information for reasonable work adjustment purposes), citizenship information; diversity information; including race, ethnic origin, sexual orientation and religion (for equal opportunity monitoring purposes) and where required, details of any unspent criminal convictions.
- b) We may also use photos of you, that you provide to us or that you make publicly available on the Internet (e.g., LinkedIn). If you use our website, click on links in emails we send to you, open or forward them, or sign up to receive job alerts or other content from us, we also collect personal data from those interactions.

We also obtain personal data about you from third parties, including:

- Referees
 - Former employers
 - Educational Institutions
 - Disclosure and Barring Service or Disclosure Scotland or international equivalent organisations
 - Credit reference agencies
 - Publicly available sources, such as LinkedIn or other Social Media sites
 - Through a referral process
 - Conducting psychometric evaluations or skills tests
- c) We may also collect your responses to survey and assessment questions.
- d) When you visit our web site our web server (through our hosting provider and or through Google Analytics) stores the IP address of your Internet Service Provider and the date and duration of your visit.

6.3 Recruitment, Consulting and Advisory Clients:

- a) In the course of our business with you we will collect personal data such as your name, job title and contact details. We also process personal data about what communications we have with you, including whether you opened or forwarded emails, newsletters or other content we have sent you.
- b) We will also process and keep a record of the personal data that you provide to us regarding a candidate or previous employee, for example if you provide a reference for a candidate.
- c) We may also process personal data about you from the public domain, such as LinkedIn and other social media sites as well as any events, where the event organiser has publicised your attendance and or is permitted to share delegate details with us.

6.4 Coaching Clients:

- a) For individual clients we will gather the basic information that you provide to us, i.e., your full name, contact details and when you started and finished the coaching sessions. We may also collect and use invoicing payment details.
- b) For organisational clients ('Sponsor Clients') who wish to utilise our coaching services for their employees and or affiliated workers, we will gather information which you have provided, i.e., your full name, job title, invoicing payment details and other communications in order for us to provide you with our services.

7. WHAT WE DO WITH THE INFORMATION WE GATHER AND WHY:

7.1 Recruitment Services-Candidates:

We use your personal data to:

- Provide you with services to find you work
- Communicate with you and answer your queries
- Enable you to apply for jobs
- Enable us to monitor equality and diversity
- Provide you with interviewing and salary advice
- Send you direct marketing for the purposes of informing you about job opportunities
- Industry reports and insights, events, promotions, competitions and other content in accordance with marketing choices.
- We may advertise within your social networks to present you with jobs
- Required by law, for example to local regulators or to law enforcement officers
- We may also use the information you have provided to track your activity on our website(s). We do this in order to have a better understanding of how visitors use the site. We use Google Analytics software to store and review tracking information

7.2 Recruitment, Consulting and Advisory Clients:

We use your personal data to:

- Provide you with recruitment, consulting and advisory services
- To maintain our business relationship with you
- To fulfil our contractual obligations to you
- To communicate with you and answer your queries
- To get feedback and improve our services and to develop new services
- To establish, exercise or defend legal claims
- For marketing purposes
- Required by law, for example to local regulators or to law enforcement officers
- We may also use the information you have provided to track your activity on our website(s). We do this in order to have a better understanding of how visitors use the site. We use Google Analytics software to store and review tracking information

7.3 Coaching Clients:

- a) For individual clients, with your prior written consent, we will gather your basic information (as described in 6.4) and share this with the International Coaching Federation and or Newfield Network. The reason for this is to validate that actual coaching took place and is not only to regulate the Coach but also industry standards.
- b) For organisational clients ('Sponsor Clients') we will gather your information (as described in 6.4) and as required, in order for us to provide you with our services.
- c) For both individual and organisational clients we will use your personal data to:
- Provide you or your employees or associated workers with coaching services.
 - To maintain our business relationship with you.
 - To fulfil our contractual obligations to you.
 - To communicate with you and answer your queries.
 - To provide invoicing information for payment.
 - To get feedback and improve our services and to develop new services.
 - To establish, exercise or defend legal claims.
 - For marketing purposes.



- We will not disclose information, that identifies you to any other third parties unless we have your prior written consent or unless required by law, for example to local regulators or to law enforcement officers.
- We may also use the information you have provided to track your activity on our website(s). We do this in order to have a better understanding of how visitors use the site. We use Google Analytics software to store and review tracking information.

8. INFORMATION STORAGE:

8.1 Recruitment Services Candidates:

Senior Leaders Limited generally works on an executive or contingent search basis on specific client mandates we do not accept CVs speculatively. If you are suitable for a client mandate then we will store the CV and any other details you provide in the manner that it was sent to us. (For example, if a CV or contact details were provided via email, it will be retained via email, by our hosting company, until such time we need to forward it to our client.) We may decide that your CV is now not relevant to any of our current client mandates. In this case we may not store your CV at all and delete it as necessary, we will not tell you of this deletion unless you ask us specifically in writing.

8.2 Recruitment, Consulting and Advisory and Coaching Clients:

Any information you provide will be stored in the manner that it was sent to us. If this was sent via email, it will be retained via email by our hosting company, until such time, in the course of our business, we need to refer to it. If we do not need this information, we may not store it at all and delete it as necessary, we will not tell you of this deletion unless you ask us specifically in writing.

9. SECURITY:

We are committed to ensuring that your information is secure. Unfortunately, no data transmission can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk. You remain responsible for the security of your computer at all times.

10. COOKIES:

Cookies are small files that are temporarily stored on your local hard disc. We use cookies in order to analyse web traffic, contact forms content or to know when you visit a particular page on our site, prepare statistics of users' preferences and to help you navigate the web site. Our cookies cannot run programs or bring viruses to your computer.

A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can deactivate this function at any time and set your browser to notify you whenever a cookie is sent. If you want to know how to do this, please look at the help menu on your browser. However, switching off cookies may restrict your use of our web site(s).

11. LOG FILES:

We use IP addresses to analyse trends, administer the site, track users' movement on our website(s) and gather broad demographic information for aggregate use. IP addresses are not linked to your personally identifiable information.

12. HYPERLINKS TO OTHER WEBSITES:

Our website(s) may contain links to other sites. Please be aware that Senior Leaders Limited (trading as 'Senior Leaders' and or 'A Fifth Space'), or any other affiliated company brand, entity or organisation; is not responsible for the privacy practices of such other sites. This privacy statement applies only to information collected by our website(s).

13. TRANSFER OF INFORMATION:

Senior Leaders Limited (trading as 'Senior Leaders' and or 'A Fifth Space') works with individuals and organisations on an international basis. Therefore, the transfer of information may occur outside the European Community, including the USA. Other countries may have data protection laws which differ from the laws of your home country.

14. CONTROLLING YOUR PERSONAL INFORMATION:

a) As the subject of personal data held about you, you have:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

If you would like more information on your individual rights we recommend taking a look at the guide by the [Information Commissioner's Office \(ICO\)](#).

b) Please contact us by the email at contact@senior-leaders.com if you require details of the following:

- You may request details of personal information we hold about you. If you would like a copy of the information held about you, please contact us on the email above to obtain a Subject Access Request Form.
- You wish to inform us of any changes to your information or wish to correct the information we hold about you.
- Have any requests with regard to our processing of your personal data.
- Decide at any time that you no longer wish to receive marketing emails from us or our group brands, entities and or companies. If this is the case, please either email the address below or follow the unsubscribe link in one of our marketing email messages sent to you.
- Do not wish us to hold your information, you are entitled to tell us at any time and we will remove all such information from our custody

15. RETAINING YOUR INFORMATION:

We will retain your information for as long as needed or permitted, considering the purpose(s) for which it was obtained.

The criteria we use to determine our retention period include:

- The length of time we have an ongoing relationship with you or our client.
- A period beyond the time of the ongoing relationship if we have a legitimate internal operational need, such as a need to retain information for analysis, record keeping and compliance.
- Whether there is a legal obligation to which we are subject.
- Any other legal or regulatory reason.

16. CHANGE OF POLICY:

We reserve the right to update and change our Global Privacy Statement at any time. If we make minor changes, we will update the date below. Should we make a material change to the way we process your data we will make sure you are alerted to this.

Last updated: January 2022