

Privacy Policy

Odgers Berndtson A/S and Pointer A/S (mother and daughter company - hereafter "Odgers Berndtson Danmark", "we", "us") is committed to keeping your information secure and managing it in accordance with our legal responsibilities under privacy, data protection laws where we operate throughout the world and the General Data Protection Regulation (Regulation (EC) 2016/679) ("GDPR") in the European Union ("EU").

We are members of the Association of Executive Search and Leadership Consultants. We are committed, as well as being in accordance with our membership requirements, to process personal data with the highest integrity and to ensure that we have and continue to implement appropriate technical and organisational measures to ensure and demonstrate that our data processing activities are compliant with data protection laws worldwide and the GDPR in the EU.

Odgers Berndtson A/S and Pointer A/ work closely together and we have a need to share Personal Data to help us run and provide our executive search services or assessment services. We have therefore entered into an agreement regarding joint data control.

This Privacy Policy provides information about how we process Personal Data within our global businesses in respect of our Search and Consulting Services (collectively "the Services").

Collecting Personal Data and the Purposes for which it is used and your rights

Processing of personal data for recruitment:

As well as collecting Personal Data from you we also collect information from third parties, offline, social media pages, publicly available sources and paid for subscriptions as well as private sources.

The service provided by Odgers Berndtson Danmark is that of Executive Recruitment and Assessment and Leadership Services. In providing that service our clients expect that we identify the best individuals to fill roles within their organisation. To do so we need to research systems, on line databases and other information sources as well as talk to many individuals.

The nature of our work is such that we are required to process Personal Data quickly, confidentially and sometimes without reference to the Data Subject. Accordingly, we process such data in accordance with the Data Protection Laws regularly using legitimate interest where it is not possible or feasible to speak directly with the Data Subject. However, we will seek consent as set out below.

We will as basis seek specific consent when processing Personal Data as part of our work with Executive Recruitment and Assessment and Leadership Services, in accordance with the GDPR article 6(1)(a). We will therefore not collect Personal Data from you unless you have specifically agreed to us doing so through a GDPR compliant consent form when you sign up to be part of our [candidate database for executive search, CEO suc-

cession, board of directors, interim appointment, etc.] [insert more if relevant]. The consent is for example collected via physical consent form or via an electronic tick-box on our website or other electronic channel.

We sometime process personal data for the purposes of legitimate interests pursued by us in accordance with the GDPR article 6(1)(f). The Services we provide involve placing individuals into roles with our clients. We act on behalf of clients where we are retained to assist them with filling a particular vacancy. We additionally conduct market intelligence exercises for our clients where we will map particular sectors / functions in order to help our client understand the talent universe into which they may wish to recruit for their business.

Certain of the roles we assist our clients with may involve an advertisement to which you may respond to either electronically or via the mail. Other roles may involve one of our researchers or consultants calling you to discuss the role. In such circumstances, we will send you this Data Privacy Notice.

In accordance with the GDPR article 9(2)(a) we will always seek your consent before processing any Sensitive Personal Data, defined as any Personal Data that describes data concerning health. We encourage you not to provide us with Sensitive Personal Data such as information on previous illness, sufferings, etc. unless it is specifically requested, and your consent obtained.

Processing of personal data for assessment and coaching:

In Denmark we may also provide services to our clients that entail the assessment and coaching of employees for that client. In these cases, and depending on the specific assignment, we will act on behalf of the client and in accordance with its instructions.

In Denmark, we provide services to individuals (assessment and coaching). In these cases, we process personal data for the performance of the contract with you. If our services include any psychometric assessments or psychological tests we will obtain your specific consent in accordance with the GDPR article 6(1)(a).

For all processing of personal data:

You are not obliged to provide any Personal Data to us. However, please note that this may mean we are unable to consider you in respect of any Services we provide to our clients or to provide services to you as an individual.

You may withdraw any consent you have previously given at any time.

You have the right to ask us, at any time, to stop processing any Personal Data and to have that Personal Data erased. In these circumstances, we reserve the right to maintain basic Personal Data such as your name and address so as to ensure we comply with your request not to have your Personal Data processed by us.

Please note that no automated decisions are made on the basis of the information we collect.

The sections below refer equally to clients as well as to candidates. In addition, we will also use Personal Data to market to clients / potential clients for business development purposes.

The Personal Data that we collect and process

We will collect and process Personal Data about you, including your name, address, telephone number and email address.

If you proceed with a job application or should we consult you about a role, you may be required to submit additional Personal Data, such as your date of birth, your education and career history and curriculum vitae (CV), or resume. Your CV or resume may contain employment history, education, professional qualifications, memberships, details of papers written, references and referees.

Based on your explicit consent we will also process psychometric assessments, psychological tests, or results from such assessments or tests.

Newsletters and other communications

If you would like to receive one of our newsletters, we will ask you to provide us with your name, email address, job title, company name and country of residence. Please see below in relation to marketing preferences and the sharing of this information.

Satisfaction Surveys

If you take part in a user satisfaction survey, we may ask you to provide us with Personal Data, including your name, email address and views and opinions.

How we use Personal Data

We use the Personal Data we collect from you for a number of purposes:

- processing job applications, in partnership with our clients, on whose behalf we are instructed to advertise job vacancies - this means that if you apply for a specific job, we may pass your details on to the relevant client to proceed with the application and you understand that this means you may receive further direct correspondence from them;

- searching for relevant candidates for confidential recruitment assignments where our client is not initially named - this means that if we believe you are suitable for a specific role, we may pass your basic details on to the relevant client. If our client believes that you might be suitable for the role we will then discuss this with you in more detail. You might be interviewed for the role by one of our consultants and if successful you might be shortlisted for interview by our client. At this point we will pass further details to our client and you understand that this means you may receive further direct correspondence from them;
- from time to time we conduct mapping or research exercises on behalf of our clients. This is to enable them to understand the particular market that they are interested in. In these circumstances, we may list out certain aspects of your Personal Data. You will not be contacted by any third party about this unless we first obtain your consent;
- allowing our clients, to understand who is making use of our website and how their job vacancies are being viewed;
- carrying out assessments of employees of our clients and in our client's interests. We will only pass details on to the relevant client if you have given your prior explicit consent;
- for performance of a contract we have concluded with you as an individual (for assessments or coaching);
- for equality monitoring purposes, to understand the diversity of our applicant pool, if admissible under applicable law (as stated above, this information is anonymised and aggregated);
- improving the service we offer - for example you may be asked to complete one of our online satisfaction surveys.
- We will only use your information in accordance with this Policy, or where we are required or authorised by law to disclose your information to others or have your consent to do so.

Communications from us

Where you have indicated you would like to receive newsletter(s) from us, we may send email alerts and bulletins to tell you about our Services and about roles we think you may be interested in. All our direct marketing activities that you receive by email or other electronic means will be based on your consent.

You can at any time unsubscribe from receiving electronic marketing messages by following the "unsubscribe" instructions included in our communication and you may change your preferences and cease receiving direct marketing from us through your account settings.

From time to time we may contact you to update you on our Services, our terms of business or simply to ensure that the date we hold is current, relevant and up to date.

Providing information to others

We work closely with trusted partners with whom we need to share Personal Data to help us run this Site and provide our executive search services or assessment services.

Apart from Pointer we furthermore work closely with the following trusted partners:

- other Odgers Berndtson offices around the world using binding corporate rules which you can view [here](#); or
- our clients, for whom we provide executive search services;

- our clients, for which we provide assessment and coaching of their employees in certain countries; and
- prospective clients where from time to time we need to demonstrate understanding of a particular market and individuals that work within it.

We will share information only as anticipated within this Privacy Policy and wherever appropriate, limit disclosure to information in aggregated form, to avoid or limit identifying you personally. Where we share information with such a third party you will not be contacted by that third party unless we have obtained your prior consent.

We may also provide information to third party service providers who process information on our behalf to help run some of our internal business operations including email distribution, IT services and customer services. These parties are required as part of our agreements with them to process such data securely and only in accordance with our instructions. You have the right to have your privacy respected in these circumstances.

Your information may be shared with organisations located in other countries around the world. As privacy laws in other countries may not be equivalent to those in your home country, we only make arrangements to transfer data overseas where we are satisfied that adequate levels of protection are in place to protect any information held in that country or that the service provider acts at all times in compliance with applicable privacy laws.

Where required under applicable laws we will take measures to ensure that Personal Data handled in other countries will receive at least the same level of protection as it is given in your home country.

We may from time to time be required to disclose information about you to law enforcement bodies, agencies or third parties under a legal requirement or court order. We act responsibly and take account, where possible, of your interests when responding to any such requests.

You understand that we may disclose or share Personal Data with third parties as outlined above to provide our Services. If you are concerned about these arrangements you should contact us and ask us not to process your Personal Data.

Keeping information secure

We invest significant resources to protect your Personal Data, from loss, misuse, unauthorised access, modification or disclosure.

Information about others

If you provide us with information about other individuals, for example details of a referee or personal contact, you must ensure that they have agreed to you providing us with their details. We would advise you to keep a record of their agreement and provide them with a copy of, or link to, this Policy to avoid any concern.

Keeping your records

We keep your Personal Data for as long as required to provide our Services, and in accordance with legal, tax and accounting requirements. Where your Personal Data is no longer required, we will ensure it is disposed of in a secure manner and, where required by applicable law we will notify you when such Personal Data has been disposed of.

Access and related rights

In Denmark, you may have the right to request copies of your Personal Data which is within our custody and control. If you think any of the Personal Data we hold about you is inaccurate, you may also request it is corrected. You may also have a right, in certain circumstances, to require us to stop processing your Personal Data.

You have the right to ask us to transfer your Personal Data to someone you nominate for your own purposes.

In relation to all of these rights, please email or write to us at the address below. Please note that we may, request proof of identity. We will respond to your requests within applicable timeframes.

In certain circumstances (for example where required or permitted by law) we might not be able to provide you with access to some of your Personal Data, but where appropriate we will notify you of the reasons for this.

Our Websites

This Privacy Policy applies also to our websites. We process Personal Data within and through this website and our partner websites, www.odgersberndtson.com, www.berwickpartners.com www.odgersinterim.com, www.odgersberndtson.dk, www.pointer-search.dk

The primary purpose of this Site is to provide you with information regarding the Services provided by the Odgers Berndtson group of companies and consultants. In certain countries, you may use the Site to view and apply for jobs.

We explain below how we collect and store Personal Data about you as you use the Site and our Services. We also set out the details of the information we hold and how long we will retain this.

In certain countries, you may be able to set up a user account. You will be asked to register a username and password, so you can gain secure access to your account. The Odgers Berndtson branded microsite on which you access your account may be owned separately from this Site.

We use the Personal Data we collect from you on our Site for additional purposes such as personalising the look and feel of the Site, to fit personal preferences which we have inferred from your usage of the site (see the "Analytics & Cookies" sections for more information).

You understand that we may disclose or share Personal Data with third parties as outlined above to operate the Site and provide our executive search services as well as assessment services (in certain countries only). If you are concerned about these arrangements you should not use the Site and you should contact us asking us not to process your Personal Data.

Updating your account and preferences

If you register an account with us, or with a local partner who provides a job application portal on our behalf, please do keep your details up to date and notify us of any changes to the Personal Data. You can do this by updating your user preferences through your account login or by contacting us using the details below.

Analytics & Cookies

We use analytics tools and cookies on this Site to help deliver our online services, identify any service issues, improve our services, provide content tailored to users' personal preferences, and monitor site traffic and usage.

These tools may be provided by third-party service providers and may include the collection and tracking of certain data and information regarding the characteristics and activities of visitors to our Site. We may disclose data, including Personal Data, to certain such third-party services providers in order to obtain such services.

One of these providers is Google Analytics and more information about the ways in which they collect and process your personal data can be found here: (<https://www.google.com/policies/privacy/partners>).

If you are located in Germany, you can directly opt-out of Google Analytics here: (<http://tools.google.com/dlpage/gaoptout?hl=de>).

Cookies are small computer files which are downloaded onto your device and collect information about the way in which you navigate and use this Site and the internet.

Cookies collect information which may allow us to identify you or your approximate location. The information provided by cookies helps us to provide you with a more personal experience, for instance by providing you with a local version of the Site in a local language and allows us to make improvements to our services over time.

We only collect "session" cookies, which are not usually stored after your browsing session has ended. These are used to establish your approximate location and provide the Site in an appropriate language. The session cookies will only be stored during your visit on the Site, i.e. they will expire when the browser is closed.

You may delete and block all cookies or decide to just block certain types of cookie via your browser setting. However, if you choose to block or delete cookies, this may affect the functionality of the Site.

How to delete or decline cookies depends on your browser. If you use a PC, you may delete cookies by using the shortcut keys [CTRL]+[SHIFT]+[Delete]. If this does not work, or if you use, for example, a MAC computer, you'll find a guide through the links below:

- Internet Explorer
- Mozilla Firefox
- Google Chrome
- Opera
- Safari
- Flash cookies

Third party sites

This Policy only applies to this Site. If you land on our Site from other websites (or move to other websites from our Site) you should read their separate privacy policies.

Terms of Use

This Privacy Policy governs the ways in which we collect and use information about you through the Site. For the terms and conditions which apply to your use of this Site, please refer to the Terms of Use.

Complaints Process

If you have a complaint about how we have handled your Personal Data you may contact us using the details below and we will investigate your complaint.

You may also file your complaints with the Danish Data Protection Agency (in Danish "Datatilsynet").

Updates

We keep this Policy under regular review and update it from time to time. This policy was last updated in May 2018. Please review this policy periodically for changes.

Please inform us if you wish us to cease processing your Personal Data.

Contact

If you have any questions about this Policy, or would like to exercise your rights with respect to your Personal Data, please contact us via compliance@odgersberndtson.com or pointer@pointersearch.dk or write to:

Odgers Berndtson A/S

CVR no. 17514598

Amaliegade 13

1256 Copenhagen

Denmark

or

Pointer A/S

CVR no. 31596182

Amaliegade 12a

1256 Copenhagen

Denmark

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