

Privacy Policy

This policy explains how we process personal data within our global businesses delivering search, consulting and assessment services, including how it affects our website: www.pointersearch.dk.

Pointer A/S (hereafter "we") 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 committed 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.

This Privacy Policy provides information about how we process Personal Data within our business in respect to 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 Pointer A/S 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, online 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 succession, board of directors, interim appointment, etc. The consent is for example collected via physical consent form or other electronic channel.

We sometimes 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:

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.

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.

We will as basis seek specific consent when processing Personal Data as part of our work 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 submit a resume to us either in hard copy, via e-mail or by other means. The consent is sent via an electronic channel.

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:

- 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

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 Website

This Privacy Policy applies also to our website. We process Personal Data within and through this website.

The primary purpose of this Site is to provide you with information regarding the Services provided by us.

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.

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.

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.

Supplier policy

Pointer A/S is committed to the highest standards of social and environmental responsibility. We expect our suppliers and business partners to share our aim to promote lawful, professional, fair practices that respects human rights, have the highest business ethics and sustainability, and to support and contribute to our aim of maintaining and improving our environmental and social commitments.

We recognise both the opportunity and responsibility we have, in partnership with our suppliers, to take a lead in addressing pressing global issues. Therefore, environmental, social and economic considerations are embedded in our decision-making. This applies to the suppliers we use as well. We believe sustainable procurement will help us achieve sustainable growth by managing risk, maximising efficiency and driving value.

This Supplier Standards of Conduct exists to promote and ensure safe and fair working conditions and the responsible management of environmental and social issues in our supply chain.

We require agreement with these “Standards” from all those involved in our supply chain. The Standards describes our expectations of how all our suppliers conduct their business and applies to all suppliers providing products or services to us. All suppliers are expected to act in accordance with the Standards, including aligning policies, practices and guidelines and communicating and enforcing the Standards throughout their organisation and across their supply chain.

We expect our suppliers to operate in accordance with all applicable laws and regulations. This includes those respecting individuals' human rights, and mindful of environmental and safety impacts of products and services. When differences arise between standards set out in the Standards and legal or regulatory requirements, the stricter standard applies, in compliance with applicable law or regulation.

Human Rights

We recognise our responsibility to protect human rights. We expect our business partners and suppliers to respect human rights and to have in place policies and processes

to meet their responsibility to protect and respect human rights that apply to all workers, suppliers, and their supply chains and to comply with all relevant legislation, regulations and directives in countries where they operate.

Suppliers sourcing goods or services in geographies with high risk of human rights violations should notify us immediately and provide information on the steps the supplier has taken to ensure risk of violation of human rights in relation to this purchasing activity are being fully mitigated. Countries with high risk of human rights violations can be identified via public sources.

We have obligations under The European Convention on Human Rights to ensure compliance and we take this responsibility seriously.

Forced Labour

Suppliers and business partners will not use or permit their subcontractor to use child, slave, forced or obligatory labour, including prison labour, indentured labour, bonded labour or other forms of forced labour.

These practices, identified by the International Labour Organization (ILO), include withholding of wages, retention of identity documents, and restriction of movement. For full guidance from the ILO please see: The 8 ILO Fundamental Conventions.

Suppliers should put into place measures that ensure workers are not exploited by third-party labour providers.

Additionally, suppliers must not engage in or support human trafficking and are encouraged to implement due diligence measures to ensure that no human trafficking exists in their extended supply chains. Suppliers must also fully comply with requirements of applicable slavery, forced labour and human trafficking laws without limitation.

Child Labour

Suppliers and business partners will ensure that no person under the age of 15 or under the age for completion of compulsory education, whichever is higher, is employed. The necessary preventive measures to ensure this include age-verification systems, training for managers, and communicating with sub-contractors and suppliers on child labour issues. Suppliers must also comply with local laws regarding the minimum age of employees and all other applicable child labour laws.

Working hours

Our suppliers must ensure that workers are not required to work more than the relevant legal limits on working hours, overtime hours and number of working days per week. All overtime work must be consensual. Workers must be granted and correctly compensated for any types of paid leave or time off to which they are legally entitled under applicable law, which may include holidays, maternity/parental leave, family care leave and sick leave. While it is understood that overtime may be required, suppliers must carry out operations in ways that limit overtime to a level that ensures humane and productive working conditions

Freedom Of Association And Collective Bargaining

Our suppliers and business partners must recognise and respect the right of employees to freedom of association and collective bargaining without interference, discrimination, retaliation or harassment and must meet or exceed relevant requirements of local law.

Health And Safety

We are committed to providing our people with a safe and secure working environment that safeguards their health, and promotes physical and mental wellbeing, regardless of where in the world they work. Our suppliers are expected to support our commitments by ensuring they comply with all applicable health and safety laws and regulations in the jurisdictions in which they operate, have the appropriate arrangements in place for managing health and safety, and be able to provide their goods and services safely, without risks to health.

As a minimum, we expect our suppliers and business partners to:

- Comply with our health and safety requirements while on our premises; including, but not limited to agreed method statements and permit to work arrangements including signatures, time and dates
- Report all incidents and near misses related to the contract
- Provide their health and safety policy statement, management arrangements, and insurances on request

Environment

We are fully committed to minimising the environmental footprint of our business operations while contributing globally to the evolving societal goals for sustainable development. We require our contractors, suppliers and service providers to have environmental sustainability commitments and operating standards comparable to our own or at the very least to be working towards achieving them.

We are signed up to Science Based Targets to reduce our carbon emissions substantially by 2030 and to move to net-zero by 2050.

We prefer to work with suppliers that have the greatest potential to influence our sustainability performance and to support us in delivering our environmental commitments, including but not limited to:

- Minimising the use of resources such as electricity, gas, water, paper
- Reducing the carbon footprint associated with our services in line with what science says is necessary to achieve a 1.5°C degree world
- Diverting all waste generated by our offices away from landfill

Ethical Business Practice

Integrity is vital for a sustainable relationship with suppliers and we will not tolerate corruption or bribery in any form. We expect all suppliers to uphold the highest standards in ethical business practice and comply with requirements of all applicable anti-

corruption laws. Our zero-tolerance approach requires all suppliers and business partners to have in place policies, systems and/or procedures to ensure zero tolerance towards, but not limited to, human rights abuses, money laundering, fraud, bribery, tax evasion, conflicts of interest, corruption and other improper payments, benefits gifts or other inducements.

Confidentiality And Information Security

Our suppliers and business partners must have robust cybersecurity processes and controls in place to protect data and confidential information. Suppliers must adopt and maintain processes to provide reasonable protections for personal, proprietary and confidential information, including information that they access, receive or process on behalf of Pointer A/S. In addition, suppliers must comply with all applicable privacy/data protection and information security laws and regulations.

Privacy And Data Protection

We expect our suppliers to protect personal information they process on our behalf. Suppliers must adopt and maintain processes to ensure compliance with applicable data protection and privacy laws and provide reasonable protections for personal information, including information that they access, receive or process on our behalf. Suppliers should recognise that unauthorised use and/or disclosure of such information may have severe, legal, reputational and financial consequences

Physical Security

Our suppliers, clients and business partners must comply with our security requirements when working with us and commit to the protection of our people, property, assets and reputation. Visitors on our premises must be escorted as far as reasonably practicable; not enter working floors without authorisation; not take any photography or video without prior written approval; comply with all applicable legislation and relevant regulatory requirements; take responsibility for their personal items; comply with any ad hoc requirements that may be implemented depending on their scope of work.

Insurance

Our suppliers and business partners must have adequate and relevant insurance including, but not limited to, public and product liability and professional indemnity insurance which is current for the duration of the contract. They must comply with any request to provide proof of insurance or other related information and keep the firm abreast of any material changes.

Sub-contracting

Our suppliers and business partners must seek our written consent before any sub-contracting.

Inclusivity

Inclusion is in our DNA.

We expect our suppliers to share the same commitment to being diverse and inclusive, both in their operations and supply chains.

In return, our suppliers will be treated fairly and equally during the tendering and purchasing process, with decisions made based on clear selection criteria.

Suppliers should take all steps required to be inclusive in their operations, which include but are not limited to:

- Treating workers with dignity and respect at all times
- Ensuring that all laws and any applicable discrimination legislation are complied with regarding the fair treatment of people
- Providing a fair and transparent recruitment and hiring processes
- Providing a workplace free from discrimination, bullying, harassment or inappropriate behaviour
- Ensuring that no person experiences disadvantage based on (but not limited to) the following:
 - Age, disability, ethnicity, faith, gender, gender identity, marital status, parental status or pregnancy, sexual orientation, social origin or any other underrepresented group
- Having a stated commitment to being diverse and inclusive and being able to demonstrate active compliance if requested

Summary

These Standards set out our expectations for current and future suppliers. We expect all new and existing suppliers to meet our minimum expectations as noted.

We encourage suppliers to institute effective management systems that use the best available techniques and practices to adhere to these Standards and continuously improve their performance. This should include a process for the identification and proactive mitigation of risks associated with compliance to these Standards, as well as a process for ongoing monitoring and review of risk controls, and prompt and accurate reporting of all incidents.

Failure by a supplier to comply with these Standards may lead to a review of our relationship or possibly termination of our relationship. We reserve the right to audit our suppliers in accordance with these Standards.

We are committed to continuously review and updating these Standards. Therefore, this document is subject to modification from time to time.

In the event of any non-compliance with the requirements of this Standards or breach of contract, we reserve the right and retain the sole discretion to exercise any rights under this Standards, any relevant contract and/or local laws and regulations.

The failure or omission to comply with the requirements of these Standards may constitute a breach of contract. In the event of any conflict or ambiguity between any provision of these Standards and the provisions of any relevant contract with any supplier, the provisions of that contract will prevail.

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 pointer@pointersearch.dk or write to:

Pointer A/S

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Amaliegade 12a
1256 Copenhagen
Denmark

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