

Last updated: January, 20, 2021

ALC Enable takes the privacy and security of your information seriously. This Policy describes how ALC Enable (collectively "ALC Enable", "we" or "us") collect, use, transfer, and disclose your information.

This Policy covers information ALC Enable collects in connection with our Executive Search Services ("Recruitment Services") and Advisory Services (collectively, including both the executive search services and the advisory services, collectively called the "Services"). This Policy also covers information collected through:

- websites we operate from which you are accessing this Policy (the "Site"),
- social networking sites and our social media pages and apps to which the Site links (collectively, our "Social Media Pages"), and
- HTML-formatted email messages we send to you that link to this Policy (collectively, including the Site, Apps, and our Social Media Pages, the "Online Systems").

This Policy also covers other means by which we collect information. For example, it also covers how we collect information from in person discussions, telephone conversations, video calls and through non-electronic communications (i.e., collection through other means than our Online Systems).

GDPR OVERVIEW:

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a new regulation which replaces the Data Protection Regulation (Directive 95/46/EC) The Regulation aims to harmonise data protection legislation across EU member states, enhancing privacy rights for individuals and providing a strict framework within which commercial organisations can legally operate.

Even though the UK has expressed its intention to leave the EU in March 2019, the GDPR will be applicable in the UK from 25th May 2018. The Government intends for the GDPR to continue in UK law post Brexit and has also introduced a Data Protection Bill to replace the current Data Protection Act in due course.

Your new rights under the GDPR are set out in this notice.

DEFINITIONS

In addition to terms defined elsewhere in this Policy, the ones listed below shall have the following meaning throughout this Policy:

"Candidate" means any candidate, interested person, or Client employee or board member, who is considered, evaluated, assessed, coached or developed by ALC Enable in connection with the Services;

"Client" means any of the organizations or individuals who contract our Services;

"Personal Information" means any information that either (a) personally identifies a natural person; or (b) pertains to an identifiable natural person, i.e. someone who can be identified, directly or indirectly, in particular, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural or social identity, or (c) constitutes individually identifiable information about an individual consumer collected by us online through our website and that we maintain in an accessible form, or that (d) we are otherwise required to protect under applicable data privacy laws (including, but not limited to, national, international and supranational data protection and privacy laws, directives, regulations and comparable legal acts). Examples of Personal Information include your contact details such as your name, email address, birthday or phone number as well as information about your professional education and experience, skills, preferences, membership in professional organizations, etc.;

"Processing" (and variations such as "Process") means any operation or set of operations which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, restriction, erasure or destruction;

"Sensitive Personal Information" means Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation;

"Site" means <http://www.alcenable.com/> and all web pages hosted at that domain.

WHO WE ARE

ALC Enable is a specialist advisory firm which offers a complete range of strategic solutions exclusively to executive search firms and networks globally, helping them future-proof, scale, and internationalise.

ALC Enable offers services to help companies recruit new personnel and attract talent ("Recruitment Services"). We provide Recruitment Services to clients searching for talent at the board-level, chief executive, and other senior executive positions

We are also an advisory firm that provides advisory services ("Advisory Services"). We help our clients implement their business strategy by consulting with them on strategy execution and organization design, technology, marketing, M&A, assessment and succession, leadership development, and other talent needs.

Often, our client may be your employer or an organization with which you are seeking employment.

We respect the privacy of our clients, candidates and other users of our Services ("you", "your") and are committed to protecting your personal data and information according to the applicable laws. This privacy policy ("Policy") explains how, to what extent and for what purposes we are collecting and subsequently processing personal data and information.

PERSONAL INFORMATION WE COLLECT

ALC Enable collects information that identifies you as an individual or relates to an identifiable individual to provide Services to you, our clients and to operate our business. The type of Personal Information we collect about you depends on the situation at hand.

We may collect your name, contact details and your preferred means of communication. We may also collect your responses to survey and assessment questions.

In the course of our Recruitment Services, we may collect the following types of information about you as a potential candidate: name, address, telephone number, e-mail address, resume information (employment history, education, professional credentials, memberships in professional organizations, skills, etc.), citizenship, information from former employers and other references, and additional information to the extent we have acquired or you have provided us with such information. We also use photos of you that you provide to us or that you make publicly available on the Internet (e.g., LinkedIn). As permitted by applicable laws, we obtain background verification information.

Where permitted by law, we may collect compensation and benefits information about you to consult with you or our clients on rewards and benefits.

In certain cases, we request sensitive Personal Information about you. We may use this information to ensure that our Services conform with legal requirements, including equal opportunity laws. Our assessments and surveys may include demographic survey questions like questions about gender, race, age, or country of origin. Except in these limited cases, we encourage you not to provide any other sensitive Personal Information to us, such as government identification numbers, payment card numbers, information related to racial or ethnic origin, political opinions, religious or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership.

Please do not provide us with any Personal Information if you do not agree with this Policy.

HOW WE COLLECT PERSONAL INFORMATION

As you interact with ALC Enable, you provide some Personal Information directly.

We may collect Personal Information when you submit a resume, respond to employment opportunities, complete online assessments or surveys, participate in online courseware, provide Personal Information about yourself in person or contact us via e-mail, electronic forms, telephone or postal mail.

If you submit any Personal Information about other people to us or to our service providers, you represent that you have the authority to do so and to permit us to use the information in accordance with this Policy.

Personal Information about you may also come from our clients to whom we provide Services.

We may also obtain Personal Information about you from third parties.

When providing our Recruitment Services we may also obtain Personal Information about you from referrals, networking activities, public databases, joint marketing partners, licensed databases, and social media platforms. The information we collect from these third parties includes information about the identity of potential candidates (e.g., an individual's name, address, telephone number, e-mail address), information about their background and qualifications (employment history, education, professional credentials, memberships in professional organizations, skills, etc.), citizenship, information from former employers and other references. We also use photos of you that you provide to us or that you make publicly available on the Internet (e.g., LinkedIn). As permitted by applicable laws, we obtain background verification information.

Any Personal Information that you provide through external pages to the third party will be subject to the third party's privacy policy, rather than this Policy. ALC Enable does not control, and is not responsible for, the third party's use of information collected through those pages. Please note that this Policy does not address the collection and use of information through the third party's page or the privacy or information practices of the third party.

HOW WE USE THE PERSONAL INFORMATION WE COLLECT

ALC Enable uses the Personal Information it collects in several ways. The summary below provides additional details about the ways we use the Personal Information we collect.

We use your Personal Information to provide our Services.

Our legal basis for collecting and using your Personal Information for the Services will depend on the Processing activity involved and the context in which it was obtained and therefore can either be based on our legitimate business interest or on your consent.

As part of Services, your Personal Information may be Processed for the business purposes of:

- providing Services on behalf of our Clients, which may include Processing of your Personal Information within your own integration, assessment, coaching or development as part of respective assignments for our Clients;
- operating the databases your Personal Information is stored in (RecruitCRM - <https://recruitcrm.io/legal/gdpr>); and
- analyzing your information using analytical tools and comparing the results against other Candidates or potential Candidates, including categorization of Candidates through profiles developed by the software, to assist us in conducting Services.

If you are a Candidate for Services relating to executive search, your Personal Information may be Processed for the additional business purposes of:

- executing searches for potential Candidates on behalf of Clients that have an opening for an executive or similar management position or for a board directorship, including, but not limited to, (i) assessing your suitability for Client opportunities, (ii) introducing you to Clients as a Candidate, (iii) verifying your educational credentials, professional diplomas and certificates, (iv) where appropriate and in accordance with applicable law, using your diversity information to provide Clients with diverse pools of qualified Candidates, and (v) ensuring that you will not be recruited on behalf of another Client unless you request consideration for other opportunities; In the course of our Recruitment Services, we may also use Personal Information that we have collected to create a profile about you. This profile may be used to identify professional opportunities that we think may be of interest to you.

We may contact you from time to time regarding those opportunities. We may also contact individuals from time to time for referrals. We may solicit names of, or additional Personal Information regarding, potential candidates in connection with our Recruitment Services to understand the market and provide other advisory services to our clients. You can always object to our creating a profile about you, see the 'Choices and Access' section below on how you can object.

If you object, we will remove your profile from our database, but this will also mean that you will not be considered for opportunities in the future.

- sending you information or materials that we believe you may find interesting, such as reports, research, invitations to networking events, or information regarding our Services, publications and surveys; and
- approaching you as a Client contact for the introduction of other Candidates or as a source of information about potential Candidates for third-party Clients.

At no point will your Personal Information be used for purposes other than providing the Services for which your Personal Information has been intended.

In the course of our Recruitment Services, we also use your Personal Information to confirm references and conduct education and background checks as appropriate.

We further use your Personal Information that we collect to aggregate and disclose diversity and other statistical information regarding our candidates and placement activities. We do so to manage our contractual relationship with you, with your consent, or because we have a legitimate business interest.

We use your Personal Information to respond to your inquiries, to verify your information, or to share information with you.

We use your Personal Information to respond to your inquiries and fulfill your requests. If you contact us, we keep a record of your contact information and correspondence, and we use information you provide in your message to respond to your inquiry. We do so to manage our contractual relationship with you.

From time to time we use your Personal Information to send you important information regarding the changes to our terms, conditions, policies, and other administrative information.

We may also contact you to verify that the Personal Information we collected about you is accurate and current. We use the Personal Information to manage our contractual relationship with you or to comply with a legal obligation.

We use your Personal Information to operate our business.

We use your Personal Information for our business purposes, such as audits, internal communication regarding candidates and clients, determining the effectiveness of our promotional activities, administering our Services, maintaining and securing our infrastructure, and for procurement and financial transactions.

We use this Personal Information to manage our contractual relationship with you and our clients, to comply with a legal obligation, and because we have a legitimate beneficial business interest.

We may use Personal Information to conduct analytics and thought leadership materials. Any published product will refer only to larger aggregations of individuals and will not identify you personally or include any results attributable to you. We perform analytics because we have a legitimate beneficial business interest in doing so.

We may retain and use Personal Information about you for research, publication, development, benchmarking and norms, validation, longitudinal studies, trend analysis, to improve and enhance our Services or to develop and market new Services. We may use Personal Information about you to ensure that our Services conform with legal requirements like equal opportunity laws. We also use your name and other personal identifiers to associate and combine information about you that is collected from one Service with information about you collected through other Services.

We may also anonymize, aggregate or de-identify Personal Information so the end-product does not identify you or any other individual. For example, we may use this information to generate norms by industry, geography, level, etc., enable us to understand where our Services are being utilized, conduct ongoing validation studies, compile reports, and publish journal articles to further the knowledge base of organizational and leadership science. Such aggregated, anonymized or de-identified information is not considered Personal Information for purposes of this Policy and we may use it for any purpose.

We may use your Personal Information to send you information or marketing materials. Please note that if we obtained your Personal Information because of a consulting engagement with our client, or you are using our Products at the request of your employer, you will not receive marketing materials as a result of the Personal Information we obtained from those Services.

ALC Enable sends informational e-mails, articles, white papers, proposals, engagement letters, and information regarding our Services. We also use your Personal Information to conduct surveys.

We do so either with your consent or because we have a legitimate beneficial business interest.

Occasionally, we may desire to use your Personal Information in press releases and direct marketing materials. Before we use your Personal Information in that way, we will obtain consent from you.

WHO HAS ACCESS TO YOUR PERSONAL INFORMATION

How your Personal Information is disclosed will depend upon the situation.

We use your Personal Information to provide our Services.

While providing our Services, we may disclose your Personal Information to clients who have engaged our services.

In the course of our Recruitment Services, we disclose Personal Information regarding candidates, including the results of assessments and related data, to prospective employers that have engaged ALC Enable to fulfill recruitment requests, or to reference sources.

In the course of our Advisory Services, we disclose Personal Information to our client. Our client can be your employer or an organization with whom you are seeking employment.

If you have completed an assessment or survey at our client's request as part of our Advisory Services, we will not share your assessment results with other clients without obtaining the appropriate consent.

From time to time, we also disclose Personal Information to our strategic alliance partners and to our network of independent consultants who provide services on ALC Enable's behalf for the purposes stated above.

You can obtain a list of our strategic alliance partners by contacting us on info@alcenable.com.

ALC Enable discloses Personal Information to third parties who provide support for our Services or business operation.

ALC Enable works with third parties who provide services that may include, but are not limited to, assessment services, including assessment validation services, website hosting and IT consulting services, data analysis, resume verification, background checking, payroll services, public relations services, marketing services, attorneys, accountants, and other administrative and back-up and security services.

As part of providing services, these third parties will be provided with access to Personal Information. In addition, our software development partners may use Personal Information to modify, improve, refine, and validate their technology, research and development.

ALC Enable may disclose or transfer all or part of your Personal Information in the event of a sale of our company. We may also disclose or transfer all or part of your Personal Information in the event of a merger or consolidation involving our company. This may also occur if there is a sale or transfer of assets or of any portion of our business.

There may be other times that we disclose your Personal Information.

ALC Enable may also use or disclose Personal Information (to comply with a legal obligation or because we have legitimate interest to do so) in order to: (i) comply with applicable laws, (ii) respond to inquiries, requests or orders from public or government authorities, including those outside of your country of residence, or (iii) protect the rights, privacy, safety or property, of ALC Enable, you or others.

We cannot and do not assume any responsibility for the actions or omissions of third parties, such as clients, including the way they use Personal Information received either from ALC Enable or from other independent sources.

In this context, please be aware that most of the third-party service providers operating the servers and some of our Clients or selected partners we might disclose excerpts of your Personal Information to are located in countries outside of the European Economic Area (EEA) that have not been found by the European Union to provide an adequate level of protection of personal data, i.e. a level of protection of fundamental rights and freedoms that is essentially equivalent to that guaranteed within the European Union. Similarly, the countries your Personal Information, or parts thereof, might be transferred to in accordance with the above may not be found to provide an adequate level of protection by jurisdictions outside of the European Union. However, we have taken appropriate safeguards to require that your Personal Information will remain protected in accordance with this Policy. These include implementing the European Commission's Standard Contractual Clauses for transfers of Personal Information within ALC Enable and our third party service providers and selected partners, which require all of them to protect Personal Information they Process from the EEA in accordance with the European Union General Data Protection Regulation.

YOUR RIGHTS:

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your personal data for marketing purposes. You can exercise your right to accept or prevent such processing by contacting us at info@alcenable.com.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for these. Please check these policies before you submit any personal data to these websites.

The GDPR provides you with the following rights. To:

- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below). This is also known as “the right to be forgotten”.
- Object to processing (withdraw consent) of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- Request the transfer of your personal information to another party in certain formats, if practicable.
- Make a complaint to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

Access to information

The Data Protection Act 1998 and the GDPR give you the right to access information held about you. We also encourage you to contact us to ensure your data is accurate and complete. Your right of access can be exercised in accordance with the Act (and the GDPR once it is in force).

A subject access request should be submitted to info@alcenable.com.

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.

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. We may decline to process requests that in our reasonable opinion may jeopardize the privacy of others or put our intellectual property at risk.

Please note that to maintain consistency in our Services and operations, we retain backup systems. When you ask that your information be removed from ALC Enable's databases, we may not be able to delete residual copies from our systems or from our backup systems, but they will continue to be protected as required under this Policy.

Please note that when we perform Services at the specific request of our client, your request may need to be directed to that client. We may only be able to provide you with a non-confidential summary of our final assessment report because these reports contain confidential client personal information that we are not allowed to disclose.

For your protection, we may only implement requests with respect to the Personal Information associated with the email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will comply with your request as soon as reasonably practical and may need to contact you to be sure that we understand your request.

We also may need to retain certain Personal Information about you such as your e-mail address to honor opt-out or similar requests. Please keep in mind that this residual Personal Information will remain within ALC Enable databases, access logs, and other records, which may or may not contain identifiable Personal Information about you. The residual Personal Information will not be used for commercial purposes. However, ALC Enable reserves the right, from time to time, to recontact former users of its Services as appropriate.

LOCATION OF PERSONAL INFORMATION COLLECTED AND MAINTAINED

Depending on the Product or Service we are providing to you, your Personal Information may be collected, used, processed, disclosed, and transferred to and within the UK and other countries in which we engage service providers. By using our Online Systems, Services, you understand that your Personal Information may be transferred to countries outside of your country of residence, which may have different data protection rules than your country.

Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available here https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en).

SECURITY

ALC Enable has reasonable organizational, technical, and administrative measures in place to protect against the loss, misuse, and alteration of Personal Information about users of the Online Systems which is under our control. Unfortunately, however, no security system or system of transmitting information over the Internet can be guaranteed to be 100% secure.

If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised or your user credentials are no longer secure), please immediately notify us of the problem by contacting us as described in the “Questions” section below.

RETENTION PERIOD

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

The criteria used to determine our retention periods include:

The length of time we have an ongoing relationship with you or our client (e.g., for as long as you have an account with us or keep using the Services),

A period beyond the time of the ongoing relationship if we have a legitimate internal operations need, such as a need to retain such information for analysis, record-keeping and compliance with data retention schedules,

Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period before we can delete them), or

Whether retention is advisable considering our legal position (such as regarding applicable statutes of limitations, litigation or regulatory investigations).

LINKS TO OTHER WEBSITES

This Policy does not address, and we are not responsible for, the privacy, information, or other practices of any other third parties.

On the Online Systems, you may have the opportunity to follow a link from or to other websites maintained by ALC Enable. The inclusion of a link on our Online Systems does not imply our endorsement of the linked site. Because these other websites may not be hosted or controlled by ALC Enable, this Policy does not address the privacy practices of those websites. We encourage you to review the privacy policies of each of those websites.

Please note that we are not responsible for the collection, usage, and disclosure policies and practices (including the data security practices) of other organizations, such as LinkedIn, Facebook, Apple, Google, Microsoft or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.

UPDATES TO THIS POLICY

ALC Enable reviews its privacy practices regularly, and those practices are subject to change. Any changes to the Policy will become effective upon posting of the revised Policy on the Internet, accessible through the Site.

SUMMARIES OF POLICY

This Policy is the sole authorized statement of ALC Enable's practices with respect to the online collection of Personal Information through the Online Systems and the usage of Personal Information. Any summaries of this Policy generated by third party software or otherwise (for example, in connection with the "Platform for Privacy Preferences" or "P3P") have no legal effect, are in no way binding upon ALC Enable, cannot be relied upon in substitute for this Policy, and neither supersede nor modify this Policy.

QUESTIONS

ALC Enable is responsible for collection, use, and disclosure of your Personal Information under this Policy.

Questions regarding this Policy should be directed to ALC Enable at info@alcenable.com or, if by postal mail, at 85 Great Portland Street, London, W1W 7LT, UK.