

Effective Date: 25<sup>th</sup> May 2018

Ledaca Associates Limited is a niche provider of executive search in European sub investment grade debt and credit. Ledaca Associates Limited greatly values your privacy and is committed to protecting your personal data. We maintain this Privacy Policy to articulate our commitment to your privacy.

In this Privacy Policy, we describe how we collect, use, and disclose information relating to individuals ("Personal Information") who participate in our executive searches, (collectively, the "Services"). We communicate our Privacy Policy to all employees, and strictly enforce the safeguards within Ledaca Associates Limited.

## Personal information we collect

We collect various categories of Personal Information in connection with the Services. If you submit an inquiry or question via our website or email, we collect your name, email address, or other Personal Information contained in your correspondence, including information shared in a résumé, or CV. If you participate in our executive search services, we collect your name, title, professional and personal contact information, demographic data, results of any assessment, compensation, employment objectives, memberships, community involvement, details in your curriculum vitae (including your educational background, work history, and other qualifications), language skills, job performance, reputation, responses to interview questions, professional contacts. If you are a client or potential client, we collect your name, contact details, title or position, products or services requested, or other information that you provide including via online forms or email correspondence. Unless required or authorised by law, we do not process sensitive Personal Information about you, unless you have affirmatively consented to this processing.

### How we use personal information

We may use Personal Information to respond to your inquiries and answer your questions about our Services. We may use your Personal Information in order provide and improve the Services, such as sourcing, identifying, assessing, and retaining talent for executive positions and teams, sending you executive positions that may be of interest to you, assessing leadership teams and organisations in efforts to improve their performance and culture, providing advisory guidance on needs and trends for our clients, and sharing thought leadership that may be of interest to you. We also may use Personal Information as necessary to meet our legal and compliance obligations or in connection with regulatory inquiries, audits, legal claims, subpoenas, warrants, or other government/judicial processes or requests.

Some jurisdictions require that we explain the legal bases we rely on to collect, use, and share your Personal Information. We rely on several different legal bases to use your Personal Information, including: (i) as necessary to perform a transaction (in order to respond to your request, such as for information about a specific Service); (ii) as necessary to comply with a legal obligation (such as when we use Personal Information for record keeping to substantiate tax liability); (iii) necessary for legitimate interests (such as providing, maintaining, securing, customising, and improving the Services we provide to you). If you have questions about





or need further information concerning the legal bases we rely upon to process your Personal Information, please contact us as detailed below.

# Disclosure of personal information

We disclose Personal Information to third party service providers, such as auditors, information technology providers or referees in order to provide the Services to help support our business operations. We also share Personal Information with our clients as necessary in connection with an executive or board search for opportunities that we believe are of interest to you, as well as in connection with providing advice or assessments in connection with our leadership consulting services. We reserve the right to disclose Personal Information in connection with the sale, assignment, or other transfer of all or part of the business, or where we believe such disclosure is required by law or is appropriate in connection with any legal claims, subpoenas, warrants or other government/judicial processes or requests, as well as to protect visitors or the company, or to comply with applicable law. We do not sell or rent your Personal Information.

# Security of personal information

Ledaca Associates Limited maintains reasonable technical and organisational measures to protect Personal Information from loss, misuse and unauthorised access, disclosure, alteration and destruction. To the extent that we disclose Personal Information to clients or third party service providers, we require that such third parties also maintain reasonable security and confidentiality measures and use the Personal Information in accordance with our instructions and applicable law.

#### **Cross border transfers**

Your Personal Information may be stored and/or processed in countries that do not provide the same level of protection for Personal Information as the data protection laws of your home country. We take appropriate steps, where required, to provide appropriate safeguards for Personal Information to be transferred, including, among others and as applicable, standard data protection clauses adopted or approved by the European Commission together with binding and enforceable commitments. Where required by law, you can request a copy of such safeguards by contacting us as detailed below.

#### Retention

We typically retain Personal Information related to marketing activities for as long as you accept marketing communications from us, and upon request, we will securely delete your Personal Information so that you can no longer be identified from it, in accordance with applicable law. For Personal Information that we collect and process for other purposes, as described above, we typically retain such Personal Information for no longer than the period necessary to fulfil the purposes outlined in this Privacy Policy, and as otherwise needed to address tax, corporate, compliance, litigation, and other legal rights and obligations, after which we will securely delete and/or take steps to properly anonymise your Personal Information.



Ledaca Associates Ltd info@ledaca-associates.com +44 (0)7702 601950



## Access to personal information - Data subject rights

Ledaca Associates Limited wishes to maintain Personal Information that is accurate, current, and complete. If Personal Information that you previously provided has changed, please submit your new information <a href="mailto:info@ledaca-associates.com">info@ledaca-associates.com</a> or contact your consultant. To opt out of marketing communications from us, please follow the instructions detailed in our communications to you.

Where required by applicable law, you have the right to obtain confirmation that we maintain certain Personal Information about you, to access the Personal Information we have about you, and to correct, delete, block or withdraw consent to the processing of certain Personal Information (without affecting the lawfulness of processing based on consent before its withdrawal), by contacting us as detailed below. In particular, you have the right to object to our use of your Personal Information, such as receiving executive openings. Please contact us below to exercise such rights. Please note that we need to retain certain Personal Information as required or permitted by applicable law.

# Changes to our privacy policy

Ledaca Associates Limited reserves the right to change or amend Privacy Policy from time to time in its sole discretion, as permitted by applicable law. If we make a material change to this Privacy Policy, we will post the revised policy on this web page and obtain your consent if required by applicable law. Nothing in this Privacy Policy is intended to create an agreement or contract between Ledaca Associates Limited and any person or entity using this website or providing any Personal Information.

### **Contact information**

If you have any questions about this Privacy Policy, please contact info@ledaca-associates.com or by post at:

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