

Key To Success Privacy Notice

This notice describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR) and Romanian Data Protection Law in force, as amended or updated from time to time, in Romania ('Data Protection Legislation'). Please be advised that the Romanian national implementing law is still in draft version, pending Parliament approval steps. We may change our privacy notice at any time without giving you early indication in this respect, so please check it each time you visit our website. Current version has been last updated on 24th of May, 2018.

DEFINITIONS

Personal data means "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one 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 the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person" (Art. 4 GDPR).

Processing of personal data means "any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction" (Art. 4 GDPR).

ABOUT US

Key2Success, hereinafter referred to also as the Company, represents the company Key To Success SRL, with head-office in Bucharest, 9 Aleea Alexandru, registered at the Registry of Commerce under the number J40/1286/2009, having unique code of registration 25050179, owner of the Internet web-site <http://www.key2success.ro>, having the following contact data: phone +40 374 00 77 72; fax +40 31 805 95 42 e-mail: romania@key2success.ro.

Key2Success is a middle and senior management recruitment company, having as purpose and main objects of its activity the matching of professionals' skills, expertise, studies and interests with potential job opportunities that the company may have in time, as well as leadership/executive development activities.

We are accountable for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

HOW WE COLLECT YOUR PERSONAL DATA

This privacy policy applies to the collection, storage and use of personal information collected by Key2Success:

- you access and browse our site - <http://www.key2success.ro> - (including when you submit personal information to us through data entry fields on the Site); or
- you respond to an advert posted by us whether via a job board, LinkedIn or other social networking site; or
- we download details uploaded by you onto a job board, LinkedIn or other social networking site in relation to an executive search project we are conducting for one of our clients; or
- we download details uploaded by you onto a job board, LinkedIn or other social networking site in connection with our internal market research ; or
- you contact us by phone, email or otherwise
- you decide to attend

WHAT PERSONAL DATA WE COLLECT ON CANDIDATES

Key2Success aims to collect the minimum data it needs to perform its role. Typically, this is name, address, job title and contact details. In addition, if you are a candidate being considered for a role it may also include your CV / resume as well as other details about your skills and experience.

A comprehensive list of personal data we collect on candidates is below:

- your name;
- your phone and e-mail details;
- your current and previous employment/work details, including job title and employer;
- recruitment-specific details such as any professional certifications, education and qualifications, skills, career history, salary range, right to work status, citizenship, referee details and any other information relevant or required by law to enable us provide our services;
- any other information which you include in your CV or a completed application form;
- notes taken during interviews reflecting answers you give us during the interviewing process
- personality assessment reports our clients we may occasionally require us to provide on some candidates
- any information which has been published or made available on a social media profile or job board (whether by you or a third party), or in any news media;
- details of your referees and emergency contacts

- references from third parties such as previous employers and nominated referees;
- the results of pre-employment screening should you require specific actions in order to gain the right to work in our clients' jurisdiction;
- any e-mail communications, including attachments, which you send to us

If you have been indicated by one of our candidates for reference check process: we collect basic contact details (such as name, title, address, email and mobile phone number) so that we can contact you for a reference check on one of our candidates.

WHAT IS OUR LAWFUL BASIS FOR PROCESSING CANDIDATE PERSONAL DATA

We use the data we collect to perform a number of tasks, including:

- placement of a candidate into a particular employment role as defined by our clients; or the provision of resourcing, outsourcing or consultancy
- maintaining our records of our candidates, clients and contacts;
- conducting marketing, profiling and business development activities as well as market research and statistical analysis regarding our products and/or services;
- complying with any legal or regulatory requirements and to make the necessary disclosure under the requirements of any applicable law, regulation, guideline or court decision

Client contacts: We use the information collected from clients to ensure that we provide business services to you. This will involve identifying candidates that will meet your requirements, or providing other business services from our portfolio.

- send you the details of candidates and consultants and contact you about our services; and
- maintain our business relationship with you.

The exchange of personal data of our candidates and client contacts is an essential part of what we do as an executive search business and, as such, it is in our legitimate interests to process your data for such purpose.

Suppliers: we use the data collected to ensure the business arrangements between us run smoothly.

Referees: we use the data collected to contact you for a reference on one of our candidates.

We believe that it is necessary for our **legitimate interests** as a recruitment business to process your personal data. We wouldn't ever process your data otherwise. At different stages in the recruitment processes we also have other lawful grounds for processing your

data such as compliance with our **legal obligations** and where it is necessary for the **performance of contracts** related to the recruitment process.

Below is a list of cases in relation to which we believe we hold a legitimate interest in processing your personal data:

- so that we can contact you (via email, SMS or phone) about opportunities and assignments that we believe you may be interested in;
- to help us to provide suitable candidates and consultants for our clients who engage us to assist them fulfil their recruitment and resourcing requirements;
- to provide a channel through which you may submit your CV for general applications, to apply for specific jobs or to subscribe to our job alerts;
- to match your details with vacancies, to assist us in finding a position that is most suitable for you and to send your information to clients for potential jobs. Please note that we will always obtain **verbal or written consent** before presenting your personal details to a client;
- to enter into contracts which are necessary in order for your service to be supplied or made available to a hirer;
- to provide recruitment-related support;
- to carry out market research for our internal use;
- to develop an industry-relevant list of candidates and clients to help meet our clients' resourcing requirements and connect candidates with work opportunities;
- for internal record keeping purposes;
- to carry out services that we, you or our client have requested including work-related references, qualifications checking services, verification of the details you have provided from third party sources, psychometric evaluations or skills tests.

This storage and use of your personal information allows you to be contacted about roles which may be of interest to you, now or in the future, and **we do not believe that this storage and use will unduly prejudice your rights or freedoms**. However, please note that we do not consider CVs **older than 5 years** absent any update to be relevant for our executive search business.

WHOM WE SHARE YOUR PERSONAL DATA WITH

For recruitment projects your personal data provided to us as candidate is processed by Key2Success using Not Actively Looking platform. We will ensure that:

- access to your personal data is restricted to staff who are required to process such data as part of their job;
- only necessary information is released to the relevant employees;
- we seek your consent before sharing your details with any prospective employer

For more information about Not Actively Looking's privacy notice please read here <https://notactivelylooking.com/terms#information-notice>

For leadership development services we may share your data with executive education providers or administrators of digital apps that facilitate interaction with executive program participants. Any such data sharing will only be done in order to deliver our service to you and in full transparency.

YOUR RIGHTS

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data 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 basis.
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 data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights, please email our data protection point of contact using dataprotection@key2succes.ro

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please email our data protection point of contact dataprotection@key2succes.ro.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

CHANGES TO THIS NOTICE

Any changes we may make to our privacy notice in the future will be updated on this web page.

We will also make you aware of changes to this policy by e-mail if applicable.

CONTACT US

If you have any questions regarding this notice or if you would like to speak to us about the manner in which we process your personal data, please email us at dataprotection@key2succes.ro.

You also have the right to make a complaint to the Romanian Data Protection Authority should you believe we have, at any time, mistreated your personal data. The Romanian DPA's contact details are as follows:

Address:	B-dul G-ral. Gheorghe Magheru 28-30 Sector 1, cod postal 010336 Bucuresti, Romania
Phone:	+40.318.059.211 +40.318.059.212
Fax:	+40.318.059.602
Email:	anspdcpc@dataprotection.ro
Website:	www.dataprotection.ro