

FIDELIO PARTNERS **PRIVACY POLICY**

This information has been produced to help you understand everything you need to know about the way Fidelio Partners Board Development and Executive Search Ltd (“Fidelio Partners”), uses, and shares personal data, what your legal rights are and how to exercise them.

We hope you’ll take some time to read this document; we’ve tried to keep it all as simple as possible and to avoid jargon, and we’ll make our best efforts to keep you informed if there are any changes to the way we process your personal data in the future.

Fidelio Partners takes its responsibility for protecting your data very seriously and we do advise you get to know our practices. If there’s anything here you don’t understand, or if you want to ask any questions, please feel free to contact us.

WHO IS THE DATA CONTROLLER?

Data Controller: Fidelio Partners Board Development and Executive Search Ltd.

Registered address: Blue Accountancy, 34 South Molton Street, London. W1K 3RG.

Registration number: 08796649

In this document Fidelio Partners Board Development and Executive Search may be referred to as “we”, “us”, or “our”.

WHAT KINDS OF PERSONAL DATA DOES FIDELIO PARTNERS PROCESS?

Fidelio Partners collects personal data for various purposes; with that in mind we have created a list of the types of personal data that we may collect, either directly from yourself or from other sources, in order to achieve those purposes.

The kinds of personal data we may collect include:

Client	Name, contact details,
Applicant	Name, CV,
Search Candidate	Name, title, telephone numbers, e-mail address, postal address, DOB, employment history and qualifications.
Professional Contact	Contact details, bank details.
Supplier / Trader	Contact details, bank details.
Sub-Contractor	Contact details, bank details.
Attendee	e-mail address
Subscriber	e-mail address, job title.

WHAT ARE THE REASONS FIDELIO PARTNERS COLLECTS PERSONAL DATA?

LEGAL OBLIGATIONS

Fidelio Partners uses personal data firstly to fulfil any contractual obligations that exist between us and yourself. Where we request personal data be provided to enter into, or meet the terms of any such contract, you will be required to provide the relevant personal data, or we will not be able to deliver the goods or services you want. In such cases the lawful basis of us processing the personal data is that it is necessary for the performance of a contract.

We are required by law to process personal data for purposes relating to our legal obligations, these include:

- To provide for our financial commitments, or to relevant financial authorities
- To comply with regulatory requirements and any self-regulatory schemes
- To cooperate with relevant authorities for reporting criminal activity, or to detect and prevent fraud
- To investigate any insurance claims, claims of unfair dismissal, claims of any kind of harassment or of discrimination, or any other claim whereby the organisation may have to defend itself

CONSENT

Fidelio Partners may process Personal Data for the following purposes where it has received consent to do so:

- Consent is required to add someone's personal data to the marketing database, to receive proprietary content
- You may withdraw your consent for us to process your personal data for these purposes at any time; after a withdrawal of consent request is received, we may have to contact you to verify the request
- Withdrawing your consent for us to process your personal data will not affect the lawfulness of the processing beforehand

LEGITIMATE INTERESTS

Fidelio Partners may process Personal Data for any of the following purposes, which are considered to be within our legitimate business interests:

- To provide goods and services where it has been requested
- To inform customers of goods and services we provide or offers that may interest them
- To send notification on subjects to individuals who have asked to be kept informed
- To improve the quality of the services we offer, and to better understand customers' needs by requesting feedback, or reviews of the services provided, or sending survey forms
- To send notifications of any changes to the goods and/or services provided that may affect people
- To recognise when people re-engage with our organisation

- To allow the organisation to support and maintain our products in active service
- To provide reference information to third party organisations, when necessary
- To protect the organisations assets

FROM WHERE DOES FIDELIO PARTNERS OBTAIN PERSONAL DATA?

We will collect personal data directly from you in various ways. This could include when you complete an online form, or if you provide the data directly to a representative of Fidelio Partners. We collect some personal data from publicly accessible sources and publicly available resources.

WITH WHOM WILL FIDELIO PARTNERS SHARE YOUR DATA?

To achieve the above stated purposes for which we process your personal data, we may have to share your personal data with certain third parties. We shall make all reasonable efforts to ensure that any third-party we share your personal data with is also compliant with data protection law.

The kinds of third parties we may share your personal data with include:

- Organisations where it is necessary to provide goods or services
- Organisations where it is necessary to setup various resources

We may disclose your information to third parties:

- When you specifically request this, such as when you submit information to enquire about suitable Executive and Board positions or submit an application via email
- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets
- If the Website or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; or if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to protect the rights, property or safety of the Website, our customers, or others

This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WILL FIDELIO PARTNERS STORE YOUR PERSONAL DATA?

As a part of our standard business practices, we may transfer your personal data to organisations based in countries that have not been granted an adequacy decision under the General Data Protection Regulation.

Where data is transferred to such countries, we shall ensure that specific safeguards or derogations have been established. These might include where the data transfer is necessary in order to fulfil a contract between us and yourself, where we have received your specific consent after having made you aware of any risks involved, or where contracts are in place between us and the third-parties involved that ensure the recipient organisation has a suitable standard of data protection in place.

We follow strict security procedures as to how your personal information is stored and used, and who sees it, to help stop any unauthorised person getting hold of it. All personal information you register with us by using our services or this Website will be located behind a firewall. Once we have

received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Unfortunately, the transmission of information via the internet is not completely secure and although we do our best to protect your personal data, we cannot guarantee the security of your data. So, we cannot accept any liability for the loss, theft or misuse of the personal information which you have registered by using our services or on the Website if there is a security breach.

We will keep your information stored on our systems for as long as it takes to provide the services to you. The third parties we engage to provide services on our behalf will keep your data stored on their systems for as long as is necessary to provide the services to you. We will not store your information for longer than is reasonably necessary or required by law.

HOW LONG WILL FIDELIO PARTNERS KEEP YOUR PERSONAL DATA?

We will keep your personal data only for as long as required to achieve the purposes for which it was collected, in line with this privacy notice.

The following criteria are what determine the period for which we will keep your personal data:

- Until we are no longer required to do so to comply with regulatory requirements or financial obligations
- Until we are no longer required to do so by any law we are subject to
- Until all purposes for which the data was originally gathered have become irrelevant or obsolete

YOUR RIGHTS, OUR RESPONSIBILITY

There are several rights granted to you immediately upon providing us with your personal information; some of these are mentioned above. We'd like you to know that at Fidelio Partners we take your rights seriously and will always conduct ourselves in a way that is considerate of our responsibility to serve your legal rights.

THE RIGHT OF ACCESS

This grants you the right to confirm whether or not your personal data is being processed, and to be provided with relevant details of what those processing operations are and what personal data of yours is being processed.

If you would like access to the personal data we have about you, we ask that you contact us using the details below.

THE RIGHT TO RECTIFICATION

This one is fairly straight forward; if you notice that the data we have about you is inaccurate or incomplete, you may request we rectify the mistake. We will make every effort to respond to requests of this type immediately.

THE RIGHT TO ERASURE

Otherwise known as the 'right to be forgotten', this gives you the right to request your personal data be deleted.

This is not an absolute right; if you were to request that we erase your personal data, we would erase as much of that data as we could but may have to retain some information if it is necessary.

Were we have received a request for personal data to be erased, if it is necessary for us to retain some of that information we shall ensure that the remaining data is used only when and where it is absolutely necessary.

THE RIGHT TO OBJECTION

The right to object is a basic freedom all democracies enjoy. If you wish to object to the way we use, or have used, your personal data you may do so freely.

THE RIGHT TO COMPLAIN

We will always try to maintain the highest standards and encourage the confidence our customers have in us as an organisation. To achieve this, we request that any complaints be first brought to our attention so we can properly investigate matters. If you would like to complain about Fidelio Partners to a regulatory body, you may do so by contacting your local data protection supervisory authority.

FIDELIO PARTNERS' CONTACT DETAILS

Fidelio Partners Board Development & Executive Search Ltd
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020 7759 2200
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WHO IS FIDELIO PARTNERS' EU REPRESENTATIVE?

Ametros Ltd
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