

FIDELIO

BUILDING BETTER BOARDS

Website Privacy Policy

March 2024

Approach & Commitment

Document Name:	Data Protection Policy
Agreed by Directors:	Mark Cumberlege Gillian Karran-Cumberlege
Review Schedule:	Check for regulatory updates every 12 months Full Policy review every 2 years
Version no:	1.4
Next review due:	Q3 2024

Fidelio Partners Board Development & Executive Search Limited is registered with the Information Commissioner’s Office (www.ico.org.uk), which is the UK’s independent body established to uphold information rights. (Fidelio registration reference: ZA476524)

Further information on GDPR can be found on the government website:

<https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation>.

Fidelio Partners will comply with all relevant legal and regulatory requirements relating to data protection. This document outlines the policies and procedures of Fidelio Partners to comply with data protection requirements.

Any known changes to the legal or professional context governing this policy, or any recommendations or considerations in relation to the policy, should be raised to the Directors for timely review.

DATA PROTECTION PRINCIPLES

As a data controller, Fidelio Partners is required to comply with the principles of good information handling.

These principles require the Data Controller to:

1. Process personal data **fairly, lawfully and in a transparent manner**.
2. Obtain personal data only for one or more **specified and lawful purposes** and to ensure that such data is not processed in a manner that is incompatible with the purpose or purposes for which it was obtained.
3. Ensure that personal data is **accurate, adequate, relevant, and not excessive** for the purpose or purposes for which it is held.
4. Ensure that personal data is not kept for any longer than deemed necessary.
5. Ensure that personal data is kept secure.
6. Ensure that personal data is not transferred to a country outside the European Economic Area unless the country to which it is sent ensures an adequate level of protection for the rights (in relation to the information) of the individuals to whom the personal data relates.

LAWFUL BASES FOR STORING DATA

Fidelio Partners will only process personal data or sensitive data if at least one of the legal bases for such holding data applies:

- **Consent:** the individual has given clear consent for us to process their personal data for a specific purpose
- **Contract:** the processing is necessary for a contract we have with the individual, or because they have asked us to take specific steps before entering into a contract
- **Legal obligation:** the processing is necessary for us to comply with the law (not including contractual obligations)
- **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests

CONSENT

Fidelio Partner's policy regarding consent is guided by the rights of individual privacy, as expressed in the principles underlying the code. Where personal data is obtained through a public resource or direct communication with individuals, names and contact details may be stored for the purpose of relevant contact within the bounds of the legitimate interests of both parties.

Data protection regulations apply equally to staff and volunteer/intern records.

Explicit consent will be sought for the processing of personal data for the purpose of ongoing marketing from Fidelio Partners.

WITHDRAWAL OF CONSENT and SUBJECT ACCESS REQUEST

Data Subjects can make a Subject Access Request (SAR), either in writing, via email, in person or via social media to the Directors of Fidelio Partners, to see all personal data held on them, including e-mails and computer or paper files. Fidelio Partners must comply with such requests within 30 days of receipt of the written request, or the current statutory requirement, if longer.

Data Subjects can make a Subject Deletion Request, in writing to the Directors of Fidelio Partners, to have personal data held on them, including e-mails and computer or paper files, deleted or destroyed. This right is not absolute and needs to be treated with care, if in doubt, please refer to our Data Protection Officer dpo@ametrosgroup.com. Fidelio Partners must comply with such requests within 30 days of receipt of the written request, or the current statutory requirement, if longer.

PRIVACY STATEMENTS

Any documentation which gathers personal and/or special categories of personal data should contain the following Privacy Statement information:

- Explain who we are
- What we will do with their data
- Whom we will share it with
- Consent for marketing notice
- How long we will keep it for
- That their data will be treated securely
- How to opt out
- Where they can find a copy of the full Privacy Policy notice

A full Privacy & Cookie Policy will also be published on our website.

ENSURING THE SECURITY OF PERSONAL INFORMATION

The disclosure of personal information 'knowingly and recklessly' to third parties is unlawful. To ensure the security of personal information received in the course of conducting business, Fidelio will follow these guidelines:

1. It is a condition of receiving a service that all service users for whom we hold personal details have given consent allowing us to hold such information.
2. Service users may also consent for us to share personal information with third parties on a need-to-know basis. Explicit consent should be sought prior to such disclosure.

3. In the absence of such consent, personal information may only be disclosed if it is in connection with criminal proceedings or in order to prevent substantial risk to the individual concerned.
4. Personal information should only be shared among Fidelio Partners staff on a strict need-to-know basis. Care should be taken that conversations containing personal information may not be overheard by people who should not have access to such information.
5. When sending emails to third parties, care should be taken to ensure that any identifying data is removed and that codes are to be used. Confidential personal information should be written in a separate document which should be password protected before sending. Wherever possible, this document should be 'watermarked' confidential.

CLOUD-BASED OR MANAGED SOFTWARE SYSTEMS

When commissioning cloud-based, or managed software systems, Fidelio Partners will satisfy themselves as to the compliance with data protection principles and robustness of the providers.

Fidelio Partners currently uses the following systems to store, process and manage information about its service users:

- Encore (Cluen) CRM (Managed Server)
- MailChimp (Cloud-Based Application)
- Outlook/Exchange Server (Managed Server)
- SharePoint (Managed Server)

Encore (Cluen) CRM, Mailchimp, Outlook/Exchange Server, and SharePoint hold data about Fidelio Clients, Candidates, Newsletter Subscribers, and Personnel. Access to each of these solutions is password-protected and restricted to named users, with level of access to each user on a 'need-to-know' basis defined by their role.

Fidelio Partners is satisfied with the security levels in place to protect its data. Most cloud-based systems in use are accredited to ISO 27001 Information Security standard. They are also accredited to the International Quality Management Standard ISO 9001 and are registered with the Information Commissioners Office.

All Managed Server infrastructure and environments are fully managed by Fidelio's IT support partner, Hands Free IT. Fidelio is satisfied that Hands Free IT have the appropriate security levels in place to protect its data.

DIRECT MARKETING

Direct Marketing is a type of communication which seeks to elicit a measurable response, such as a website visit, newsletter sign-up, or a business meeting. The communication may be conducted in any of a variety of formats including mail, telemarketing, and e-mail.

Fidelio Partners will reach out to our current and former service users and other associated parties from time to time, for example with a note on current topics or an invitation. We will utilise the personal contact information we hold to reach out to relevant institutions and individuals on the basis of legitimate interest.

We recognise that clients, staff, and other associated parties for whom we hold records may prefer to be contacted through other means (e.g., through an assistant or only at work or only in a particular format), or not at all. This wish will be recorded in Fidelio records and used to inform future communications.

Consent will be sought to sign-up individuals to Fidelio's regular newsletter publication, and this mailing list will be held in a separate database. Contact information held by Fidelio for the purposes of legitimate interest will not be utilised for newsletter sign-up without explicit consent of the data subject.

Fidelio Partners will not share or sell its contact records or database(s) with outside organisations.

The following statement is to be included on any forms used to obtain personal data:

We promise never to share or sell your information to other organisations or businesses, outside of the scope agreed for the services we supply. You can opt out of our communications at any time by writing to Fidelio Partners, 60 Petty France, London SW1H 9EU or by sending an email to info@fideliopartners.com.

PERSONAL DATA BREACH

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data. Personal Data Breaches can include:

- Access by an unauthorised third party
- Deliberate or accidental action (or inaction) by a data controller or data processor
- Sending personal data to an incorrect recipient
- Computing devices containing personal data being lost or stolen
- Alteration of personal data without permission
- Loss of availability of personal data

If you discover or suspect a data protection breach, you should immediately report this to the Directors and the Fidelio IT Support Partner (Hands Free IT), who will review the nature and impact of the breach of our systems and measures to prevent a recurrence.

Once informed of a breach, the Directors will follow the Data Breach process and determine whether it needs to be reported to the Information Commissioner. There is a time limit (72 hours) for reporting breaches to ICO so the Directors and data protection officer should be informed without delay.

PRIVACY POLICY & COOKIE 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

60 Petty France, London, England, SW1H 9EU

020 7759 2200

Info@fideliopartners.co