

This Privacy Policy applies on and from the 25th May 2018.

Keeping Your Data Safe

At GQR we are committed to looking after your personal data and giving it the respect and safety it deserves in line with our legal obligations. This Privacy Policy serves to tell you in detail, the purposes for which we process your personal data, our legal basis for doing so, who we will share your data with, your rights and anything else that is important for you to know. We will only process your personal data in accordance with the terms of the following Privacy Policy.

About GQR

GQR is a trading name of Wynden Stark LTD. We are an executive global talent acquisition firm which provides work-finding services to our clients and work-seekers. In order to provide these services, we must process personal data and in doing so, we act as a data controller. This means that we are responsible for deciding how and why your data is used and for ensuring that your data is handled both legally and safely.

You may have provided your personal details to us directly by such means as an application or a registration form via our website, or we may collect them from another source such as a jobs board, a networking site or through a professional contact.

Why GQR Collects Your Data

We collect your personal data and will process your personal data for the purposes of providing you with work-finding services and/or providing information relating to roles relevant to you. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, and developing and managing our services and relationship with you and our clients. If you are working with us in the capacity of a client, we may offer additional tailored talent acquisition advisory services that are relevant to your business requirements.

In some cases, we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

The Type Of Data We Collect

The types and categories of data that we collect will depend on whether you are working with us as a candidate or a client.

If you are a candidate, we will collect the following personal data on you:

- General contact details such as a name, address, email and phone number;
- your work experience/history;
- professional qualifications;
- your eligibility to work in the relevant country;
- your opinions and feedback on interviews and our service;
- any other information that you voluntarily offer which is relevant to work-finding services.

If you are a client, we will collect the following personal data on you:

- General business contact details such as name, address, email and phone number;
- your current employment and if necessary your past work experience;
- your opinions and feedback on candidates and our service;
- any other information that you voluntarily offer which is relevant to work-finding services.

In the event that we have a requirement to process your sensitive personal data in line with work finding services (e.g. medical/health information, criminal records), we will always get your consent to do so first. The legal bases for processing sensitive personal data will be consent.

When you visit our website, we collect information about how you use our website. This includes your IP address and your movements on the website, such as the pages you have viewed and what you have clicked on. You can find more detailed information about this in our [Terms of Use](#).

GQR's Legal Basis For Using Your Data

Data protection law requires us to have a legal basis for processing your personal data, and for us to notify you of that basis.

With the exceptions of sensitive data and marketing activities, we process your personal data identified in this Privacy Policy on the basis that we have a legitimate reason to do so, and provided it is both reasonable and does not go against what you would reasonably expect from us.

Where we have relied on a legitimate interest to process your personal data our legitimate interests are as follows:

- To offer work-finding services as part of our business as an executive global talent acquisition firm;
- to maintain and develop an ongoing relationship with you;
- if you are a candidate, contacting you with relevant job opportunities similar to ones that you have either expressed an interest in, or have the relevant skills for;
- if you are a candidate, sending your information to clients in instances whereby you have demonstrated an interest in a particular type of work and/or industry but not expressly consented to the passing of your CV;
- if you are a client, contacting you with relevant candidate skill sets for your vacancy;
- if you are a client, contacting you with additional tailored talent acquisition services such as employer branding and people intelligence services;
- to improve our services to you.

We only collect information that is reasonably necessary for the above purposes.

Who Will GQR Share Your Data With?

In order to provide you with work-finding services we will process your personal data and/or sensitive personal data with the following recipients:

- Clients that we work with to introduce candidates to;
- if you are a client, candidates that we work with to provide work-finding services;
- our data processors which we employ to perform business functions and services on our behalf; these include our IT and Database providers, accounting and legal advisors, our marketing CRM providers and our job boards and Applicant Tracking Systems
- our permanent operations within the US and Australia;
- any government, law enforcement agencies or regulators such as the Police, HMRC, the Employment Agencies Standards or any other regulator as required by law;
- any other organisation you request us to share your data with if it is appropriate to do so in line with work-finding services.

The Company may transfer only the information you provide to us to countries outside the European Economic Area (“EEA”) for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

In the event that GQR is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

How Long Does GQR Keep Your Data For?

The Company will retain your personal data only for as long as is necessary for the purpose we collect it and in order to maintain a relevant and suitable, ongoing relationship with you. Different laws may also require us to keep different data for different periods of time.

Your Rights

Under data protection law you have the following rights:

- The right to be informed about the personal data we process on you;
- the right of access to the personal data we process on you;
- the right to rectification of your personal data;
- the right to erasure of your personal data in certain circumstances;
- the right to restrict processing of your personal data;
- the right to data portability in certain circumstances;
- the right to object to the processing of your personal data that was based on a public or legitimate interest;
- the right not to be subjected to automated decision making and profiling; and
- the right to withdraw consent at any time.

You can contact us at mydata@gqrgm.com if you want us to restrict the type or amount of data we process for you, to access your personal data or exercise any of the other rights listed above.

There may be circumstances where we will still need to process your data for legal or official reasons. We will inform you if this is the case and if so, we will restrict the data to only what is necessary for the purpose of meeting those specific reasons.

If you believe that any of your data that we process is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

Where Does GQR Find Your Data?

As an Executive Search firm, we employ a variety of sources and we may have sourced your personal data from any of the below:

- Through direct contact with us or an employee of ours;
- through a job application on our website;
- through a job application on a job board;
- through a referral from a professional contact within the industry;
- through a networking site such as LinkedIn;
- through contact at events and/or conferences either run by us or a related company;
- through a variety of inquiry and subscription forms on our website;
- through an online search platform.

We may have sourced some of this information from a publicly accessible source.

How Does GQR Use Your Data For Marketing Activities?

We will only use your personal data for the purposes of providing you with marketing material where we have obtained your consent for this service.

We try to ensure that our marketing activities are as personalized as possible. We provide information on industry related news and updates, upcoming events and any other information regarding our services that may be of interest to you based on your job-seeking and/or industry preferences or any other preferences that you have indicated whilst providing your consent.

We will only use email and/or SMS messages to provide this information to you depending on what contact method you have consented to. We will not pass your details on to any third party for marketing purposes.

You have the right to opt-out of these services or to request a change in your marketing preferences at any time, either by emailing mydata@gqrgm.com or by unsubscribing using the link provided at the bottom of all marketing material.

Internal Applicants

We are always keen to improve the experience we provide for our internal applicants. Therefore, if you have been approached or applied to work for us directly, we will send you a feedback survey to understand your personal experience and identify any strengths or areas of improvement within our interview process, with the intention of improving the experience for future internal applicants.

You are not obliged to fill out this survey and you may opt-out of receiving this survey anytime by contacting mydata@gqrgm.com or by asking your Talent Acquisition Representative.

Complaints Or Queries

If you wish to complain about this Privacy Policy or any of the procedures set out in it, please contact mydata@gqrgm.com.

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

Any changes to this Privacy Policy in the future will be updated on this page and where appropriate, be notified to you by email.

Data Controller Information

The data controller is Wynden Stark LTD trading as GQR (registered in England under registration no. 06834191 and with its registration address at 3 Albert Embankment Westminster Tower, London, SE1 7SP).

The data controller is registered with the ICO under number: ZA347699