

Notice of Collection of Personal Information & Privacy Policy Under the California Consumer Protection Act (CCPA)

Effective: January 1, 2020

This Notice and Privacy Policy applies to the collection of personal information from California residents on and from January 1, 2020. Last Updated: January 8, 2020.

Our Privacy Policy

At GQR we are committed to looking after your personal information 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 categories of personal information we collect, the business purposes for which we collect, use and share your personal information, who we will share your data with, and your rights and anything else that is important for you to know. We will only collect your personal information in accordance with the terms of the following Privacy Policy and in order to carry out our lawful business activities.

Who are we?

GQR is a trading name of Wynden Stark LTD. In the US, it is Wynden Stark LLC dba GQR Global Markets. 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 collect your personal information and share it with others, such as prospective employers. 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 we collect your personal information?

For purposes of this Privacy Policy, “personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household. Personal information does not include publicly available information, information that is de-identified or aggregate consumer information, or information that is outside the scope of the CCPA. By accessing our website, using our services or submitting personal information to us, you consent to the collection, use and sharing of such information as set forth in this Privacy Policy, as it may be updated from time to time.

We collect your personal information for the purposes of providing you with work-finding services and/or providing information relating to roles relevant to you and suitable to your interests and qualifications. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, marketing our services, 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.

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The categories of personal information we collect

The categories of personal information that we collect will depend on whether you are working with us as a candidate/work seeker or a client.

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

Identifiers:

General contact details, such as a name, address, email, IP address and phone number

Information Under California Civil Code §1798.80(e)

- This information comprises any information that identifies, relates to, describes or is capable of being associated with you in our records;
- Your opinions and feedback on interviews and our service;
- Any other information that you voluntarily offer which is relevant to work-finding services, including but not limited to information you provide on a web form, resume or CV;
- Some personal information in this category may overlap with other categories. For example, information on your resume may disclose your professional or employment related experience or educational background

Protected Characteristics:

Gender or other characteristics that are protected under California or federal law

Internet and electronic history:

- Information regarding your use of our websites;
- Information collected through use of cookies and tracking technologies

Professional or employment related Information:

- Your work experience/history;
- Your professional qualifications;
- Your professional interests and abilities;
- Your eligibility to work in the relevant country

Education Information:

Your educational record/history

Medical information:

Although we do not generally collect medical or health related information, there are times that we may collect this type of sensitive information as it pertains to job requirements

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

Identifiers:

General business contact details such as name, address, email, IP address and phone number

Information Under California Civil Code §1798.80(e)

- This information comprises any information that identifies, relates to, describes or is capable of being associated with you in our records;
- Your opinions and feedback on candidates and our service;
- Any other information that you voluntarily offer which is relevant to work-finding services;
- Some personal information in this category may overlap with other categories.

Internet and electronic history:

- Information regarding your use of our websites;
- Information collected through use of cookies and tracking technologies

Professional or Employment related Information:

Your current employment and if necessary your past work experience;

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

When you visit our website we collect information about how you use our website, including through the use of cookies and other tracking technologies. The information we collect includes your IP address and your movements on the website, such as the pages you have viewed and what you have clicked on. We use cookies to collect information about your usage, personal preferences and to allow us to remember you. If you do not want us to use cookies, you may be able to turn off that feature on your computer or mobile devices. You can find more detailed information about this in our [Terms of Business](#).

In the past twelve (12) months, we have collected the following categories of personal information: identifiers, information under section 1798.80(e) of the California Civil Code, medical or health information, protected characteristics, internet activity, professional or employment related information, and education information.

Our business reasons for using your data

California Law requires us to advise you of the business reasons for collecting your personal information.

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Our business reasons 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;
- 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 provide you with services you request from us;
- to fulfill the purpose for which you provided us with your personal information;
- to market and improve our services to you;
- to improve our websites.

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

Who will we share your data with?

We do not sell your personal information to third parties.

In order to provide you with work-finding services we will share your personal information with the following third parties:

- Clients that we work with to introduce candidates to;
- if you are a client, candidates that we work with to provide work-finding services;
- any other organization you request us to share your data with if it is appropriate to do so in line with work-finding services.

We also share your information with our service providers, including:

- 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 Applicant Tracking Systems providers.

We also share your information with our permanent operations within the United Kingdom and Australia and with any government, law enforcement agencies or regulators or any other governmental agencies as required by law.

The Company may transfer the information you provide to us to countries outside the United States for the purposes of providing you with work-finding services. We will take steps to ensure reasonable protections are in place to ensure the security of your information.

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. In the past twelve (12) months, we have shared the following categories of personal information: identifiers, information under section 1798.80(e) of the California Civil Code, medical or health information, protected characteristics, internet activity, professional or employment related information, and education information. We have shared this information during the past (12) months with the following categories: service providers and third party businesses.

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How long do we keep your data for?

The Company will retain your personal information only for as long as is necessary for the business 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 the California Consumer Protection Act, you have the following rights in personal information held by us:

- You have the right to request that the Company disclose the personal information it collects, uses, discloses and shares. You may request (i) the categories of personal information that we have collected about you; (ii) the categories of sources from which the personal information is collected; (iii) the business or commercial purpose for collecting or sharing personal information; (iv) the categories of third parties with whom we share your personal information; and (v) the specific pieces of personal information that we have collected about you.
- You have the right to receive your personal information in a portable format that allows you to transmit the information to another entity.
- You have the right to request deletion of personal information under certain circumstances. For example, we may not be required to delete personal information if we need to retain the information to complete the transaction for which the personal information was collected, perform on a contract with us, or to comply with a legal obligation.
- You have the right not to receive discriminatory treatment for the exercise of any of these rights. We will not discriminate against you in the provision of services based on your exercise of these rights.

You may submit verifiable requests concerning any of your rights by contacting us by telephone, interactive web form or email. We will use reasonable methods for verifying that the person making a request to know, data portability or a request to delete is the individual about whom we have collected personal information. This may involve, depending on the nature of the request, confirming that the email address provided corresponds with our records concerning the individual. Additional reasonable measures may also be required to verify the identity of the person making the request depending on the circumstances. For online requests to delete, you will be required to submit the request to delete, and then separately confirm that you want your personal information deleted. To the extent that you wish to use an authorized agent to make requests concerning the rights set forth above, you will need to provide us either with a power of attorney or, alternatively, with written authorization to communicate with your authorized agent.

We will (i) confirm receipt of requests to know or to delete within 10 days of the request; and (ii) generally respond to requests to know, data portability or to delete within 45 days of the request. If we need additional time to respond to your request beyond the 45 days, we will provide you with notice explaining the reasons we need more time, and we will then take up to an additional 45 days to respond to your request.

You can contact us at mydata@gqrgm.com if you want us to restrict the type or amount of data we collect or share for you, to access your personal information or exercise any of the other rights listed above. You may also contact us at our Los Angeles office at 310-807-5030.

There may be circumstances where we will still need to collect 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.

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Where do we find your data?

As an Executive Search firm we employ a variety of sources and we may have sourced your personal information 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 do we use your data for marketing activities?

We will only use your personal information 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 personalised 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. You may also contact us at our Los Angeles office at 310-807-5030.

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.

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

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Access by Persons With Disabilities

Persons with disabilities who need assistance accessing this policy may contact us as provided for above, and depending on your individual needs, the company will grant reasonable requests to furnish this policy in an alternative format.

Children

We do not knowingly collect personal information from children under the age of 13. If you are under 13, please do not give us any personal information. If you are a parent or legal guardian, we request that you help enforce our privacy policy by instructing your children never to provide personal information without your permission. If you have reason to believe that a child under the age of 13 has provided us with their personal information, please contact us using the above contact information and we will seek to delete that information in our possession. We do not sell any personal information to third parties, including the personal information of minors under 16 years of age.

Third Party Websites

This website may from time to time contain links to other external websites. This Privacy Policy does not apply to third-party websites. The Company does not control and is not responsible for the privacy practices or the content of third-party websites.