

This privacy notice (“Privacy Notice”) describes how Wynden Stark, LLC d/b/a GQR Global Markets (“we”, “us”, or “Wynden Stark LLC”) may use and disclose information that we may collect about all users and viewers through the sites. This Privacy Notice applies on and from October 17th, 2022.

Keeping Your Data Safe

At Wynden Stark LLC we are committed to looking after certain information that identifies you as an individual or relates to an identifiable individual (“Personal Information”) Personal Information and giving it the respect and safety it deserves in line with our legal obligations. This Privacy Notice serves to tell you in detail, the purposes for which we process your Personal Information, 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 Information in accordance with the terms of the following Privacy Notice.

About Wynden Stark LLC

Wynden Stark LLC 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 Information 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 Wynden Stark LLC Collects Your Data

We collect your Personal Information and will process your Personal Information 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 visitor to the site, we may collect the following Personal Information on you:

- Internet activity, such as your browsing activity on the Site, your IP address, cookies, and installed plug-ins. This information, including geolocation data, is collected automatically. [Please see our cookie policy here.](#)
- Regarding your IP address, this is a number that is automatically assigned to your computer by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Sites, along with the time of the visit and the pages visited. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems, and administering the Sites. We may also derive your approximate location from your IP address.

- Geolocation data
- Identifiers if you wish to download certain reports like our salary guides, in which case you will need to provide your first and last name, email
- Professional information if you wish to download certain reports like our salary guides, in which case you will need to provide your job title

If you are a candidate, we may collect the following Personal Information 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 may collect the following Personal Information 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 Information 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 Information 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](#).

Wynden Stark LLC's Legal Basis For Using Your Data

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

With the exceptions of sensitive data and marketing activities, we process your Personal Information identified in this Privacy Notice 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 Information 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.

Sharing Your Data

In order to provide you with work-finding services we may process your Personal Information and/or sensitive Personal Information 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 Wynden Stark LLC 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 Wynden Stark LLC Keep Your Data For?

The Company will retain your Personal Information 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 Information we process on you;
- the right of access to the Personal Information we process on you;
- the right to rectification of your Personal Information;
- the right to erasure of your Personal Information in certain circumstances;
- the right to restrict processing of your Personal Information;
- the right to data portability in certain circumstances;
- the right to object to the processing of your Personal Information 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 Information, 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.

Your California Privacy Rights

The right to know what Personal Information is being collected about you

A consumer shall have the right to request that a business that collects Personal Information about the consumer disclose to the consumer the following:

1. The categories of Personal Information it has collected about that consumer.
2. The categories of sources from which the Personal Information is collected.
3. The business or commercial purpose for collecting or selling Personal Information.
4. The categories of third parties with whom the business shares Personal Information.
5. The specific pieces of Personal Information it has collected about that consumer.

The right to know whether Personal Information is sold or disclosed and to whom

A consumer shall have the right to request that a business that sells the consumer's Personal Information, or that discloses it for a business purpose, disclose to that consumer:

1. The categories of Personal Information that the business collected about the consumer.
2. The categories of Personal Information that the business sold about the consumer and the categories of third parties to whom the Personal Information was sold, by category or categories of Personal Information for each third party to whom the Personal Information was sold.
3. The categories of Personal Information that the business disclosed about the consumer for a business purpose.

The right to equal service and price, even if you exercise your privacy rights

A consumer shall have the right to request that a business delete any Personal Information about the consumer which the business has collected from the consumer.

A business that receives a verifiable request from a consumer to delete the consumer's Personal Information pursuant to subdivision (a) of this section shall delete the consumer's Personal Information from its records and direct any service providers to delete the consumer's Personal Information from their records.

A business or a service provider shall not be required to comply with a consumer's request to delete the consumer's Personal Information if it is necessary for the business or service provider to maintain the consumer's Personal Information in order to:

1. Complete the transaction for which the Personal Information was collected, provide a good or service requested by the consumer, or reasonably anticipated within the context of a business's ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
3. Debug to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the businesses' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent.
7. Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
8. To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business.

9. Comply with a legal obligation.
10. Otherwise use the consumer's Personal Information, internally, in a lawful manner that is compatible with the context in which the consumer provided the information.

Right to opt-out

You may submit a request directing us not to make certain disclosures of Personal Information we maintain about you. For more information about the possibility of submitting an opt-out request, please refer to our Opt-out preferences page.

Where Does Wynden Stark LLC 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 Does Wynden Stark LLC 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.

Complaints Or Queries

If you wish to complain about this Privacy Notice 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 Information be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

Any changes to this Privacy Notice 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 LLC trading as Wynden Stark LLC (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