

Privacy Policy

Boquest Global Limited (**we, us** or **our**) respect your privacy and are committed to protecting your personal data.

This policy sets out the basis on which any personal data about you will be processed by us. Please read this policy (and any other privacy policy we may give to you) carefully to understand our views and practices regarding your personal data. Where we provide you with any other privacy policy or notice, this policy is designed to be in addition to and not in place of that other policy.

For the purpose of the Data Protection Act 2018, the General Data Protection Regulations 2016 and any and all other applicable laws and regulations relating to the processing of personal data and privacy (the **Data Protection Legislation**), we act as the data controller.

1. Information we collect

1.1. We may collect personal data from you in the following ways:

- 1.1.1. information about you that you give us by filling in details on our website located at the domain name www.boquestglobal.com (our **Website**) or by corresponding with us by phone, e-mail, LinkedIn, social media (including, but not limited to, Facebook, Twitter, Pinterest, Instagram, and WeChat) or otherwise. The information you give us may include your name, address, e-mail address and phone number, gender, date of birth, financial information (including bank account details), employment history and future employment expectations, together with such other information as is provided in your curriculum vitae (**CV**) and other relevant information (which may include some more sensitive, special category personal data such as that relating to your health or any disabilities you may have);
- 1.1.2. information which you post on publicly accessible forums such as your current employer's website, LinkedIn and other social media platforms;
- 1.1.3. information about you available in other publically accessible sources such as the media;
- 1.1.4. information which is provided to us by third parties such as third parties acting on your behalf or who recommend you to us;

- 1.1.5. records of interviews that we have arranged for you including feedback on those interviews and your specific job interest requirements including but not limited to salary expectations, location and job role;
- 1.1.6. if you contact us, we may keep a record of that correspondence;
- 1.1.7. if you complete surveys that we use for research purposes (although for the avoidance of doubt you do not have to respond to such surveys), the information which you provide in response to that survey;
- 1.1.8. the substantive outcome of any interviews and/or testing which you undertake with any third parties on behalf of any prospective employer or directly with any prospective employer;
- 1.1.9. where you are contacting us as a recruiter, whether on behalf of your employer or otherwise, details of your position and employer (if relevant), together with your business contact details;
- 1.1.10. where you are contacting us as a supplier or potential supplier of goods or services to us, your employer, your position, and your business contact details
- 1.1.11. technical information regarding your visits to our Website including, but not limited to, the Internet protocol (IP) address used to connect your computer to the Internet, geographical location, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- 1.1.12. information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our Website (including date and time), job vacancies you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call us.

2. IP addresses and Cookies

- 2.1. We may collect information about your computer, including, where available, your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.
- 2.2. Our Website may use cookies to distinguish you from other users of our Website. Cookies contain information that is transferred to your computer's hard drive. This

helps us to provide you with a more personalised service when you browse our Website and also allows us to improve our Website.

- 2.3. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our Website.

3. How we use your personal data

- 3.1. We may use the information which we collect and hold about you in the following ways:

- 3.1.1. to carry out our obligations arising from any contracts entered into between you and us as is necessary for the performance of our contract with you including providing our agreed services to you which may include putting you forward for various roles and opportunities as discussed with you and in accordance with our agreement with you;
- 3.1.2. to provide you with the information and services that you request from us prior to entering into a contract with us;
- 3.1.3. to provide you with information which you request from us as is in our legitimate interest to do so;
- 3.1.4. to answer your enquiries in accordance with our legitimate interests;
- 3.1.5. to maintain our business relationship with you whether as a client or potential candidate in accordance with our legitimate interests;
- 3.1.6. in respect of candidates, to allow us to evaluate your application or CV and give you advice or tips on the same as well as finding suitable opportunities for you in accordance with our legitimate interests;
- 3.1.7. where we have obtained your personal information from LinkedIn or any other social media platform we may use it to contact you in accordance with the terms of LinkedIn, or the appropriate social media platform, in respect of opportunities and/or candidates which we believe may be of interest to you in accordance with our legitimate interests. This is unless you have specifically informed us or indicated via the relevant social media platform that you do not wish to be contacted about potential employment opportunities or candidates. You may opt-out of receiving any

such communications by letting us know either through the relevant social media platform or on the details set out below;

- 3.1.8. where we have obtained your information from your current employer's website or any other publicly accessible source, and your email address belongs to a corporate subscriber, we may use your information to contact you about potential job opportunities. You may opt-out of receiving any such communications either by following the opt-out or unsubscribe link on any communication we may send to you or by letting us know on the details set out below;
- 3.1.9. to process information about you which may include references, qualifications, verification of details you have provided from third party sources, results of psychometric evaluations or skills tests as it is in our legitimate interests to do so;
- 3.1.10. to notify you about changes to our service as is in our legitimate interests to do so;
- 3.1.11. to provide you with information about other services we offer that are similar to those that you have already been provided with where it is in our legitimate interests to do so. You may unsubscribe at any time from receiving further communications from us for these purposes;
- 3.1.12. to provide you with information about services we feel may interest you (including but not limited to employment situations), any news or industry updates, upcoming events or other information, where you have consented to be contacted for such purposes. You may unsubscribe at any time from receiving further communications from us for these purposes;
- 3.1.13. to provide talent mapping services in accordance with our legitimate interests;
- 3.1.14. we may use images and videos of you, along with your name and position as part of our marketing and promotional activities where you have provided these to us or where you have willingly participated in a recording, in accordance with our legitimate interests;
- 3.1.15. to ensure that content from our Website is presented in the most effective manner for you and for your computer as is in our legitimate interest;
- 3.1.16. to administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes so as to allow us to provide you with the best possible service and experience as is in our legitimate interest to do so;

- 3.1.17. as part of our efforts to keep our Website safe and secure as is in our legitimate interest;
- 3.1.18. to send your CV and personal data to our clients as recruiters in order for you to apply for a job vacancy or pursuant to any potential appointment or vacancy where you have specifically requested we do so and where we have your informed consent to do so; and
- 3.1.19. where your information is provided to us as a supplier or potential supplier of goods or services, to consider and assess the goods and services which you are offering or supplying to us, and for the purposes of entering into or performing our contractual obligations to you.

For the purposes of the above, our 'legitimate interests' include the proper administration, monitoring and improvement of our business and the Website, the promotion of our business including direct marketing and the maintenance of the goodwill and reputation of Boquest Global Limited which includes the provision of excellent customer service and care. Where you provide us with any special category personal data (as referred to above) we will only use this with your express permission.

Please note where we require personal information from you in order to process or evaluate your CV or application or to provide this to a potential employer, your failure to provide the requested personal information may mean that we are unable to proceed with the processing of your application or CV and/or cannot put you forward for that vacancy, we will inform you where this is the case.

In addition, you should be aware that we may use your personal data as part of a salary survey or benchmarking process. Where we do this your information will only be shared with third parties in an anonymised and/or aggregated format so that you cannot be identified from it. This does not apply where we are providing your current salary or salary expectations to a potential employer of yours as part of the services we are providing to you in accordance with our contractual obligations to you and as is in our legitimate interest to do so.

4. Automated Processing

- 4.1. We do not carry out any automated processing, however you should be aware that some of the potential employers we work with may carry out automated processing and screening.

5. Providing your personal data to others

5.1. We may share your personal information with:

5.1.1. Our clients as prospective or intended employers (or third parties assisting them in the recruitment process) and/or third party companies who we are targeting on your behalf as potential employers as is in our legitimate interest to do so and in accordance with any contract we may have with you.

5.1.2. Selected third parties who perform functions on our behalf and who also provide services to us, such as professional advisors and IT consultants carrying out testing and development work on our business technology systems and providing IT support and server back up as it is in our legitimate interest to do so.

5.1.3. We will disclose your personal information to third parties:

5.1.3.1. in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets as part of the sale or purchase process in order to allow such transaction to complete as is in our legitimate interest to do so;

5.1.3.2. if Boquest Global Limited or substantially all of its assets are acquired by a third party or its business merges with another business or company, we may share personal data with the new owners of the business or company or their professional advisers as is in our legitimate interests to do so; and

5.1.3.3. 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 Boquest Global Limited, our clients or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction as it is in our legitimate interests to do so.

6. Where we store your personal data and international transfers of your data

6.1. Given the nature of our business, the data that we collect from you may be transferred to recruiters and potential employers located outside the European Economic Area (**EEA**) including where such destinations have not been confirmed

as having adequate levels of protection for personal data and which do not benefit from an adequacy decision issued by the European Commission. Where this is the case we will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy including where possible ensuring that the transfer is made subject to appropriate safeguards which may include the use of standard data protection clauses approved by the European Commission. However, where we are targeting potential employers on your behalf who are based outside the EEA it may not be possible to put in place appropriate safeguards. In these cases your personal data will be transferred only where it is necessary for the performance of our contract with you or where you have requested that we do so as a step prior to entering into a contract and provided that such transfer is in accordance with the Data Protection Legislation. In any other situation your personal data will only be transferred outside of the EEA where we have your explicit consent to do so.

- 6.2. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us electronically; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

7. Retaining and deleting personal data

- 7.1. We shall ensure that any personal data that we process is not being kept for longer than is necessary for the purpose that we collected it for.
- 7.2. Your personal data will be retained for a period of 5 years from the last query, instruction, engagement, CV submission and/or application we receive from you, at the end of which period it will be deleted from our systems. This is because we consider that it is in our legitimate business interest to retain the data for this period of time, after which period it is unlikely to remain relevant.
- 7.3. Notwithstanding the above, we may retain your personal data where such retention is necessary for compliance with our legal obligations.
- 7.4. Subject to paragraph 7.2 below, we will retain limited personal data for an indefinite period of time pertaining to candidates as follows:
 - 7.4.1. in the event that we no longer wish to work with a candidate, we shall retain their name, email address, telephone number, most recent place of work and the reason for not working with the individual; and

7.4.2. where we have placed a candidate in employment with one of our clients, we will retain a candidate's name and a record as to which client we placed them with.

8. Your rights

8.1. You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data that we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data that we hold about you corrected, although we may need to verify the accuracy of the new personal data that you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with local law. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal data which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
 - **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. You can ask us to stop sending you marketing messages at any time by following the “unsubscribe” (or similar) links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any services we have provided to you or other transactions.
- 8.2. If you wish to exercise any of your above rights, please send a written request to us at the address listed at the end of this privacy notice.
- 8.3. You will not have to pay a fee to access your personal data or to exercise any of your other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- 8.4. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 8.5. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.
- 8.6. Our Website may, from time to time, contain links to and from external websites as a service to our visitors. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. The provision of a link on our Website

to an external website should not be taken as an endorsement by us of that external website, its owners or their products / services.

9. Changes to our privacy policy

- 9.1. We may make changes to the privacy policy and where we do so we will endeavour to notify you of the revised policy and will make it available on our website. Please check back frequently to see any updates or changes to our privacy policy.

10. Complaints

- 10.1. If you are unhappy with the way in which we have collected or processed your personal data or have any other complaint in relation to our handling of your personal data, you can make a complaint to the Information Commissioner. Further information can be found on the Information Commissioner's website at www.ico.org.uk or via their helpline on 0303 123 1113. If you are not in the UK but are in Europe, you can make a complaint to your local body responsible for data protection issues. These are usually known as 'competent supervisory authorities'. Having said this, if you are unhappy with anything we do or have done we would welcome the opportunity to put it right so please do let us know.

11. Contact

- 11.1. Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to BoQuest Global Limited, Berkeley Suite, 35 Berkeley Square, Mayfair, London W1J 5BF. You can contact us by telephone on +44 (0)20 7193 9388 or by email at info@boquestglobal.com.