

Alex and Yuan Partners Limited

Data Protection and Privacy Statement

PRIVACY NOTICE

At Alex and Yuan Partners we are committed to protecting and respecting your privacy. This privacy notice sets out the basis on which we collect from you any personal data or data that you provide to us and how this is processed.

The General Data Protection Regulation (GDPR Regulation 2016/679) has replaced the Data Protection Regulation (Directive 95/46/EC).

The GDPR defines, “personal data” as any information relating to an identified or identifiable natural person (a “data subject”), being a natural person who can be identified, directly or indirectly. This particularly makes reference to an identifier such as a name, identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The GDPR regulation has been applicable in the UK as of the 25th May 2018. Upon exiting the European Union, the UK Government has intentions to continue with the GDPR through the Data Protection bill which shall replace the current Data Protection Act.

Please read the following information carefully to understand the purposes for which we process your personal data, the legal basis to do so and who we will share your data with. It will also outline your rights and other important information. We will only process your data in accordance with the terms of the following Privacy Policy.

DETAILS

For the purposes of data protection legislation in force from time to time the Data Controller is Alex and Yuan Partners Limited, 63 St Mary Axe, London, EC3A 8AA.

Company Number: 12945743

For UK enquiries:

Our Data Protection officer is Zena Alex, Director and Partner of Alex & Yuan Partners Limited

Email address: Zena.Alex@alex-yuan-partners.com

Telephone number: 0208 159 2666

For all European enquiries:

We have appointed IT Governance Europe Limited to act as our EU representative. If you wish to exercise your rights under the EU General Data Protection Regulation (EU GDPR), or have any queries in relation to your rights or general privacy matters, please email our Representative at eurep@itgovernance.eu Please ensure to include our company name “Alex and Yuan Partners” in any correspondence you send to our representative.

As a business we are registered with the ICO under number ZA804225.

ABOUT US

Alex and Yuan Partners Limited (AYP) is an executive headhunting firm which provides work finding services to our clients and work-seekers. We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Business Regulations 2003. In order to provide such services, AYP must process personal data and in doing so we act as a data controller. Therefore, we are responsible for deciding how and why your data is used and we ensure that your data is handled in a safe and legal manner.

We collect various types of personal data to allow us to undertake our business:

- Active and Prospective Client contacts
- Active, Prospective and placed candidates for permanent or temporary roles
- Employee Details
- Consultants
- Temporary workers
- Supplier contact details that support our services

We collect this data in order to allow us to carry out our core business and our ancillary activities. The information collected is both what you give to us as well as what we collect about you.

This information is inclusive of details you give to us when you correspond via email, phone or through other means i.e. our Website or LinkedIn. It also includes information you provide when you register to use our services, enter our database, subscribe to our services, attend any events, or even when you report an issue with our website.

The information may include your name, address, private and corporate email addresses, financial information, right to works, photograph etc.

We may receive information about you from contracted third-party business partners, sub-contractors, payment services, credit reference agencies and others and others we work closely with. The information received is for the purposes of our recruitment services and ancillary support services.

WHY DOES AYP COLLECT YOUR DATA?

At Alex and Yuan Partners we collect your personal data and will process it for the purposes of providing work finding services or providing you with opportunities that may be relevant to you.

For example this will include:

- Assessing how suitable you are for those job opportunities
- Contacting you about job opportunities
- Developing our services or managing our relationship with both you and our clients
- Updating our databases
- If you are a client – we may offer additional tailored advisory services that may be relevant to your business needs.
- Putting you forward for job opportunities with our clients

In certain circumstances, we may be required to use your data for the purposes of detecting, investigating, and reporting crime and in order for us to comply with the Law.

In order to show our compliance with industry standards as well as for auditing purposes; we may need to use your information.

OUR SERVICES

As a headhunting executive search business, the core service that we offer to our candidates and clients is the introduction of candidates to our clients for the purpose of both temporary or permanent positions.

Due to the nature of our business, our services expand to supporting individuals throughout their career and to support businesses with their business strategies and resourcing needs & growth trajectory.

Our legal basis for processing your personal data is our legitimate business interests. In some instances we will rely on legal obligation, contractual and consent for specific uses of data.

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or receive services from you or your organisation.

We will rely on legal obligation in instances where we are legally required to hold information on you in order to fulfil our legal obligations.

In some circumstance we will rely on consent for particular uses of your data and you will be asked for your express consent, if this is required by Law.

CANDIDATE AND CLIENT DATA

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

- Contact details such as Name, Home & Work Address, Email (Private and Professional) and Phone Number
- Your work experience and History / Track record and in some instances your Business Plan
- Professional qualifications and Grades
- Your eligibility to work in the relevant country
- Your opinions and feedback on roles, interviews and our service
- All other information that you voluntarily offer and which is relevant for working finding services

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

- Business contact details such as Name, Address, Email and Phone Number
- Your current employer and where 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

AYP'S LEGAL BASIS FOR USING AND PROCESSING YOUR DATA

As a recruitment business and agency we introduce candidates to clients for permanent, temporary and independent employment contracts.

The personal data that is exchanged between both our clients and candidates is not only essential but a fundamental part of the process.

As a business, we require a database of both client and candidate personal data in order to support our candidates' future career and our clients resourcing needs. This data may contain historical information as well as current resourcing requirements.

To maintain, develop and expand our business we need to record the personal data of prospective candidates and client contacts.

Consent

Should we want or need to rely on consent to lawfully process your data we will request your consent orally, by email or by an online process for the specific activity we require consent for and record your response on our system.

Where consent is the lawful basis for our processing you have the right to withdraw your consent to this particular processing at any time.

Other uses we will make of your data:

- Use of our website
- Notification about changes to our service
- To ensure that content from our site is presented in the most effective manner for you and the device you are viewing it on

We will use this information:

- To administer our site and for internal operations, including troubleshooting, testing, survey purposes etc.
- To improve our sit and to ensure that content is presented in the most effective manner for you and your computer
- To allow you to participate in interactive features of our service, when you choose to do so
- As part of our efforts to keep our site safe and secure
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.

Please note-

We do not undertake decision making that is automated, therefore a person will always be involved in the decision making process.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a better user experience when you browse our website and also allows us to improve our website.

Please refer to our cookies policy for more information.

THIRD PARTIES AND YOUR DATA

We will share your personal information with selected third parties which includes:

- Clients for the purposes of introducing candidates to them for positions
- Candidates for the purpose of arranging interviews and engagements
- Clients, Business Partners, Suppliers for the performance and compliance obligations of any contract we enter into with them or you
- Subcontractors including event organisers, payment and other financial service providers
- Analytics and search engine providers that assist us in the improvement and optimisation of our website
- Credit reference agencies, our insurance broker, compliance partners and other subcontractors for the purpose of assessing your suitability for a role where there is a condition of us entering into a contract with you.

We will disclose your personal information to third parties:

- 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
- If Alex & Yuan Partners 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.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of supply of services and other agreements; or to protect the rights, property, or safety of Alex & Yuan partners, Our customers or others. This includes exchanging information with other companies or organisations for the purposes of fraud protection and credit risk reduction.

The lawful basis for third party processing includes:

- Their own legitimate business interests in processing your personal data, in most cases to fulfil their internal resourcing needs;
- Satisfaction of their contractual obligations to us as our data processor;
- For the purpose of a contract in place or in contemplation
- To fulfil their legal obligations

Currently all the data that we collect from you may/will be transferred to, and stored at, a destination inside the European Economic Area ("EEA"). It may be transferred to third parties outside of the EEA for the purpose of our recruitment services. It may also be processed by staff operating outside the EEA who work for one of our suppliers. This includes staff engaged in, among other things, recruitment services and the provision of support services. By submitting your personal data, you

agree to this transfer, storing or processing. Alex & Yuan Partners will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice.

All information you provide to us is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site or a site operated by a third party (for example, a client's time recording system), you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 our site; 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.

Retention of your data

We understand our legal duty to retain accurate data and only retain personal data for as long as we need it for our legitimate business interests (or other appropriate legal basis) and that you are happy for us to do so. Accordingly, we have a Data Retention Notice and run data routines to remove data that we no longer have a need to retain.

We do the following to try to ensure our data is accurate:

- Prior to making an introduction we check that we have accurate information about you;
- We keep in touch with you so you can let us know of changes to your personal data.
- We segregate our data so that we keep different types of data for different time periods.
- The criteria we use to determine whether we should retain your personal data include:
 - o The nature of the personal data;
 - o Our Legal Obligations;
 - o Your data's perceived accuracy
 - o Whether your CV and Profile has been shared with our client or third party
 - o Whether you have been placed with our client or whether an interview has been arranged;
 - o Our expertise in recruitment and knowledge of the industry. We separate this into three categories Country, Sector Focus and Job Title/Role.

We may archive part or all of your personal data or retain it on our financial systems only, deleting all or part of it from our main Customer Relationship Manager (CRM) system. We may pseudonymise parts of your data, particularly following a request for suppression or deletion of your data, to ensure that we do not re-enter your personal data on to our database, unless requested to do so.

How we pseudonymise Data:

Pseudonymised Data is created by taking the identifying fields within our database and replacing them with pseudonyms or artificial identifiers.

Our current retention notice is available upon request.

Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (prior to collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes and we will collect express consent from you if legally required prior to using your personal data for marketing purposes.

You can exercise your right to accept or prevent such processing by opting in or out on the forms we use to collect your data. You can also exercise the right at any time by contacting us via email at admin@alex-yuan-partners.com

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. 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 GDPR provides you with the following rights. To:

- Request correction of the personal information that we hold about you.
- Object to processing of your personal information where we are relying on a legitimate interest or the interests of a third party and there is something about your situation which makes you want to object to processing on this ground.
- If we are processing your information for direct marketing purposes; you have the right to object to this.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example this may include you asking us for the reason for processing it or if you want us to establish its accuracy.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing.
- Request the transfer of your personal information to another party in certain formats, if practicable.
- You can also make a complaint to a supervisory body which in the United Kingdom is the Information Commissioner's Office. The ICO can be contacted through this link: <https://ico.org.uk/concerns/>

Access to information

Under the GDPR, you have the right to see what information we hold on you.

A subject access request should be submitted to admin@alex-yuan-partners.com

No fee will apply

Changes to our privacy notice

From time to time we may make changes to our privacy notice. Any changes we make to our privacy notice in the future will be posted on this page. If it is appropriate to do so you will be notified by e-mail.

We advise you to check back frequently to see any updates or changes to our privacy notice.

Contact

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to admin@alex-yuan-partners.com