

## PRIVACY POLICY

Wynden Stark Limited (“we” and “us”) is committed to protecting and respecting your privacy. This policy, together with our terms of business and the forms we use for collecting data from you, sets out the basis upon which any personal data we collect from you, or that you provide to us, will be processed by us. The following sets out our views and practices, and you should read it carefully.

For the purposes of the Data Protection Act 1998 (the “Act”) the data controller is Wynden Stark Limited of St Clements House, 27-28 Clements Lane, London EC4N 7AE. The data controller is registered with the Information Commissioner number Z1866073 and the nominated representative for the purposes of the Act is Steven Talbot.

### Disclosure of your information

The work market in which we operate is international and communications are predominantly electronic. By providing information to us as a candidate for employment you expect and accept that we will process your data and transmit it to third parties. We will not, except with your prior consent, provide information to third parties that identifies you as an individual, for example by revealing your name or personal contact details. However, you acknowledge and accept that in the market in which we operate information that does not specifically identify you as an individual may be sufficient for a third party in that market to deduce your identity.

### Your consents

By submitting your information to us you:

- Consent for the purposes of paragraph 1 of Schedule 2 to the Act to us processing your personal data (as defined in the Act).
- Consent for the purposes of paragraph 1 of Schedule 3 to the Act to us processing your sensitive personal data (as defined in the Act).
- Consent for the purposes of paragraph 1 of Schedule 4 to the Act to us transferring your information to a recipient outside the European Economic Area.

### Information that we may collect about you

We may collect and process information about you that you provide by completing on line forms on our website [www.rostron-search.com](http://www.rostron-search.com) and/or which you submit to us electronically through our site, information that you provide to us in interviews or over the telephone, information that you send to us in hard copy form and information that we may be given by referees or other third parties.

The information that we collect may include your full name, personal and business email addresses, telephone and fax numbers and postal addresses, date of birth, sex, education history, skills and qualifications, employment history (including remuneration and remuneration structures), references and identities of referees, passport, visa and work and/or residence permit information, ethnic origins, religious beliefs, criminal records, personal interests, marital or partnership status and dependents, and job requirements (including location, remuneration sought, industry sector and job title).



We may collect data about your visits to our web site for statistical and marketing purposes. We do not, however, use cookie files or collect IP addresses.

### **Storage and transmission of data**

In addition to our own computer systems, we may use service bureaux within or outside the European Economic Area (“EEA”) to store and process data and to whom data may be transferred. We will use strict procedures and security practices and features to prevent unauthorised or accidental manipulation, destruction, loss or access to your data.

We will not normally transmit data outside the EEA unless the recipient is in a country approved by the European Commission as providing an adequate level of protection for the rights and freedoms of data subjects. A list of these countries may be viewed at the Commission website:

[www.europa.eu.int/comm/justice\\_home/fsj/privacy/thirdcountries/index\\_en.htm](http://www.europa.eu.int/comm/justice_home/fsj/privacy/thirdcountries/index_en.htm).

This includes United States entities that have signed up to a “Safe Harbor” agreement. Further details of these companies may be found from the US Department of Commerce website:

[www.export.gov/safeharbor](http://www.export.gov/safeharbor).

We may also transmit data to an entity that is neither in a country approved by the European Commission as providing an adequate level of protection for the rights and freedoms of data subjects nor a signatory to a Safe Harbor agreement. In such cases we will only transmit information to a recipient that in our opinion itself provides an adequate level of protection for the rights and freedoms of data subjects.

### **Use of your information**

We will use your information for the purposes of rendering professional recruitment services, keeping our own accounts and records and (without identifying you personally) for our own advertising, marketing and public relations activities. Sensitive personal data (as defined in the Act) may be used by us for equal opportunities and similar monitoring purposes and we may pass this information to third parties for their own monitoring purposes.

### **Your rights**

You may ask us not to process your personal data for marketing purposes.

You have the right to ask us to provide information in writing about your information that we hold.

You may ask us to remove your information from our database records.

You may exercise all or any of these rights by making written application to our nominated representative named above.

### **Changes to this policy**

We may make changes to this policy at any time and post such changes on our website.