

## **AEM INTERNATIONAL LIMITED PRIVACY POLICY**

### **Under General Data Protection Regulations from 25 May 2018**

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### ***Background***

AEM International Ltd., Arts, Entertainment and Media Executive Search, is an international search firm that specialises in finding, placing and developing leaders for the arts, entertainment and creative industries.

Operating at Board level, our experienced team offers a personal, bespoke service to our clients, advising on organisational design and delivering on their search for competitive leadership talent worldwide.

Our assignments are high profile, and many are in the public arena. We place Chairs, Chief Executives and Artistic Directors for leading performing arts companies, museums, galleries, conservatoires and government agencies, as well as senior executives for the creative industries and global entertainment corporations in the UK and overseas.

### ***Commitment***

AEM International is committed to protecting the personal information and data of all our candidates and our clients. We have in place security procedures and measures to ensure that the environment in which we hold your data is secure, both physically and electronically.

This Privacy Policy explains what information we gather about you, what we use that information for and who we give that information to. It also sets out your rights in relation to your information and who you can contact for more information or queries.

Our Privacy Policy has been developed as an extension of our commitment to combine the finest quality service with the highest level of integrity in dealing with our candidates and clients. We collect identifiable personal information and sensitive data only when there is a legitimate business need to do so.

All information and data collected is treated with the utmost sensitivity and confidentiality.

Consent to hold data is implicitly gained from all candidates where personal information and CVs are shared with Heather Newill and her team.

## ***Why We Collect Your Data***

We want to give you the best possible experience whenever you deal with the AEM International team. By retaining your data, this helps us present you with appropriate career-progression opportunities during your working life.

## ***What Data Do We Collect***

In order to assess your suitability and potential interest in specific career opportunities, we collect a variety of information about you which includes, but is not limited to: your name, job title, organisation, email address (personal and work), telephone number (direct work, mobile and home), Skype address, CV, remuneration and compensation package, family situation, work history, educational information and future career aspirations. We also collect feedback you have given us in relation to conversations we have had.

From our clients, we collect data pertaining to specific job opportunities, which enables us to undertake executive search services.

## ***What Legal Basis Do We Use for Collecting Data***

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data.

We rely on **legitimate interest** as the legal basis for collecting, processing and storing your data. This includes such details as, but is not limited to, your name, job title, organisation, work contact details, private email address and mobile number. We require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running a professional executive search business and which does not materially impact your rights, freedom or interests.

Once we are in dialogue with you regarding a specific position, or speculatively regarding a general conversation surrounding career advice or aspirations, we rely on the **legal basis of consent**, and will request this from you during our contact with you in order to process your data. Typical examples of such information which we collect and store under the legal basis of consent include, but are not limited to, Curriculum Vitae, covering letter when applying for specific positions and notes from our conversations with you, which may include compensation details.

## ***Methods of Collecting Your Data***

We do this in a variety of ways, including:

- [1] Through **direct contact with you** – information you have shared with us is collated during telephone, email, Skype and interview conversations, including your CV.
- [2] Through **publicly available data** – sources such as internet search engine results, company websites, LinkedIn, information received via email shots (e.g. conference material), social media.
- [3] Through **third party sources** – information obtained from conversations with people who have recommended you, e.g. other candidates, industry professionals and clients. Where you are a candidate and we have obtained your personal data from such a third

party, it is our policy to advise you that you were recommended to us but to keep the details of the source confidential.

### ***Methods of Storing Your Data***

Data is stored and recorded electronically (e.g. Excel, Word, Outlook) and manually, and contains a mix of corporate and personal data. All personal data collected in relation to specific assignments is stored by password-protected electronic means. Handwritten notes are stored in a locked office. Any paper copies of data are held for a limited period and then shredded.

Personal data is collected for a specific, explicit and legitimate purpose in order to undertake executive search services for our clients.

AEM International will only share specific personal data details relevant to the assignment with those whom AEM International is authorised to do so.

### ***Security in Storing Your Data***

We know how important data security is and we take every precaution to ensure your data is secure. We will always treat your data with the utmost care and take all appropriate steps to protect it, including:

Office:	Double-locked doors
Router:	Firewall protected
Desk top	
Computer:	Password protected and never removed from office. All data is electronically backed up on a weekly basis.
Wi-Fi:	Secure, password-protected and with no public access.
Mobile Phone:	Password protected.
Laptop:	Password protected.

Access to specific information is restricted to the AEM International team, contracted staff and external researchers. It is shared only with clients with whom we are working on a specific search assignment.

CV's and Search or Client Reports are password protected when shared electronically between AEM International and freelance researchers.

AEM International maintains a personal data breach register, including the facts relating to the breach, the impact and the remedial actions taken.

AEM International is strongly committed to protecting the personal information and data of our candidates and clients. We will not disclose any details relating to executive search assignments outside our offices, or share privileged client information pertaining to searches.

### ***When We Share Your Data***

Data will be shared between AEM International and contracted researchers and will only be shared with a third party, (our client), during the course of a specific assignment and then only with your consent. This includes CVs forwarded to us on a speculative basis. Typically, we share

your personal information in the form of your CV, your covering letter of application and our client report, which is based on information we have gathered during conversations with you in the course of the search.

Clients operating within the EU are contractually obligated to adhere to GDPR guidelines.

Clients operating outside the EU will be requested by AEM International to adhere to GDPR guidelines in relation to the handling of your data during the search assignment.

### ***How Long Will We Store Your Data***

During the course of an executive search assignment, a variety of your data is collected (see *What Data Do We Collect*). We will store this data securely to enable us to make a considered judgement on whether a specific future career opportunity may or may not be of interest to you.

We will only store your personal data for as long as is reasonably necessary for us to comply with our legal obligations and for our legitimate business interests.

Applications sent to AEM International for publicly advertised positions that are being handled by us on behalf of a client, will be acknowledged and consent asked to share them with our client. Once the assignment has been successfully closed, we may ask consent from you to retain your CV for future suitable opportunities. Applications where consent is not requested will be confidentially destroyed within 18 months of the assignment closing.

### ***Know Your Rights***

You have many rights, by law, regarding your personal data. These include:

- The right to access the personal data we hold about you, free of charge in most cases.
- The right to be provided with clear, transparent and easily understandable information about how we use your data.
- The correction of your personal data when incorrect, inaccurate, out of date or incomplete.
- The right 'to block' - suppress further use of your information in terms of processing, although we may continue to store your information.
- The right 'to be forgotten' - for your data to be removed or deleted when there is no compelling reason for us to retain it.
- The right to object to processing – you no longer wish to be approached regarding career opportunities.
- The right to request that we stop any consent-based processing of your personal data after you withdraw that consent.

If at any point you believe the information we process on you is incorrect you have the right to request to see this information and have it corrected or deleted. If you wish to raise a complaint on how we have handled your personal data, or have any questions, you can contact us to have the matter investigated at:

Heather Newill  
Managing Director  
AEM International Ltd  
01728 660026

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Policy.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

If you are not satisfied with our response, or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner's Office:

[www.ico.org.uk](http://www.ico.org.uk)

### ***Changes to this Privacy Policy***

This Privacy Policy is reviewed against industry best practice and may be updated from time to time to reflect changes in our business, or legal or commercial practice.

***End of Document***