

## **DATA PROTECTION POLICY 07/05/2018**

This data protection policy defines the internally approved data protection principles for processing of personal data within Horton International Netherlands (“Horton” or “we”). Horton greatly values your privacy and is committed to protecting your personal data. This policy will apply to Horton and executive search activities, executive coaching, team coaching, transition support, and online assessments performed by it (collectively, the “Services”). We communicate our Privacy Policy to all employees, and strictly enforce the safeguards within Horton.

### **Scope and goals of this data protection policy**

This data protection policy will endeavour to ensure that the legal rights of Horton customers, job candidates, own employees as well as of other constituencies are enforced with respect to processing of personal data by us and our data processors. We pay special attention to confidentiality of and access rights to personal data. We want to ensure that nobody will be harmed by processing of his/her personal data and that rights of the data subjects are implemented.

### **Personal information we collect**

We collect various categories of Personal Information in connection with our Services. If you submit an inquiry or question via an online form or email to our website, we collect your name, email address, or other Personal Information contained in your correspondence, including information shared in a résumé, or CV. If you receive or participate in our executive search activities, executive coaching, team coaching, transition support or online assessments, we collect your name, title, professional and personal contact information, demographic data, results of any (online) assessment, survey, compensation, employment objectives, memberships, community involvement, details in your curriculum vitae (including your educational background, work history, and other qualifications), language skills, job performance, reputation, responses to interview questions, and financial details, which we collect from you or third party sources such as online searches, professional contacts, and your employer. If you are a client or potential client, we collect your name, contact details, title or position, products or services requested, or other information that you provide including via online forms or email correspondence. Unless required or authorized by law, we do not process sensitive Personal Information about you, unless you have affirmatively consented to this processing.

### **Indirect data collection and cookies**

Our website automatically collects certain device information such as your IP address, Cookies (as discussed below), geographic data, country, browser, device operating system, language settings, and pages that have been shown to you. Note, however, we do not consider this device information to be Personal Information except where we link it to you as an individual or where applicable law requires.

This website also uses small text files called cookies, tags and other tracking technologies (collectively, "Cookies"), which are stored on your device or browser. As discussed in detail below, we use Cookies to provide our website, gather information about your usage patterns when you navigate this website in order to personalize your experience and to understand how visitors generally use our website in order to improve our website.

**The Cookies on our website are generally divided into:**

- **Strictly Necessary Cookies:** Cookies that are necessary in order to operate our website, such as maintain the security of the website. These are session Cookies that are erased when you close your browser.
- **Analytical/Performance Cookies:** Cookies that allow us to recognize and count the number of people who visit our website and understand how such visitors navigate through our website. This helps to improve how our website works, by ensuring that visitors can easily find what they are looking for on our website. These Cookies are session cookies which are erased when you close your browser.
- **Functional Cookies:** Cookies that improve the functional performance of our website and make it easier for you to use, including that you have previously visited our website in order to maintain your language preferences. These Cookies qualify as persistent Cookies, because they remain on your device so we can provide the same experience during your next visit to our website.

### *Cookie choices*

You can review your Internet browser settings, typically under "Help" or "Internet Options" for options you have to block certain Cookies. To learn more about Cookies used for interest based advertising, and to exercise certain choices you have regarding these Cookies, please visit the [Digital Advertising Alliance](#), [Digital Advertising Alliance-Canada](#), [European Interactive Digital Advertising Alliance as applicable](#), or the [Network Advertising Initiative](#). Please also visit the following specific links for additional information and choices on certain Cookies:

- [Google Analytics](#) – to analyze how you use our website

Please note that by opting out of certain cookies, you will not be able to access important functions or enjoy certain conveniences of this website.

### **How we use personal information**

We may use Personal Information to respond to your inquiries and answer your questions about our Services. We may use your Personal Information in order provide and improve the Services, such as sourcing, identifying, assessing, and retaining talent for (executive) positions, and sending you (executive) positions that may be of interest to you. We also may use Personal Information for the purposes of securing our website and IT systems and other business administration purposes, including as necessary to meet our legal and compliance obligations or in connection with regulatory inquiries, audits, legal claims, subpoenas, warrants, or other government/judicial processes or requests.

### **Third parties**

Horton will only transfer your personal data to its executive search assignment clients and consultancy companies who own Horton and perform assignments for Horton. Horton engages subcontractors to perform parts of the service, such as companies performing candidate testing services. They may have access to personal data so that they can perform their duties but only to the extent required for their performance. We may also provide access to information to our affiliated companies and other parties belonging to Horton group of companies globally.

### **Data transfer**

Personal data collected by Horton International Netherlands can be transferred to another European Economic Area member state (EU member countries and Iceland, Liechtenstein and

Norway) in accordance with the same principles allowing transfer and processing within the Netherlands. We will transfer data outside the Netherlands borders only if it is required in the executive search assignment. We will only transfer personal data outside the EEA Area or to an international organisation where the European Commission has decided that the third country, a territory or one or more specified sectors within that third country, or the international organisation in question ensures an adequate level of protection. In the absence of the aforesaid decision we transfer personal data to a third country or an international organisation only if the controller or processor has provided appropriate safeguards, and on condition that enforceable data subject rights and effective legal remedies for data subjects are available. Such appropriate safeguards may consist of relying on Privacy Shield (US) or using the EU Model Clauses.

### **Security of personal information**

We maintain reasonable technical and organizational measures to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. To the extent that we disclose Personal Information to clients or third party service providers, we require that such third parties also maintain reasonable security and confidentiality measures and use the Personal Information in accordance with our instructions and applicable law.

### **Data retention period**

We strive to store the personal data in a form from which the data subject is identifiable for as long as it is necessary to achieve the purpose of the data processing. We will define retention periods for the collected personal data. The premise concerning the retention of data is that we will only use the data for as long as necessary considering the purpose of the data, but for no longer than five years, after which we will renew consent for data processing or delete the personal data (unless due to a statutory special retention obligation).

### **Access to personal information - Data subject rights**

We wish to maintain Personal Information that is accurate, current, and complete. If Personal Information that you previously provided has changed, please submit your new information [here](#). Where required by applicable law, you have the right to obtain confirmation that we maintain certain Personal Information about you, to access the Personal Information we have about you, and to correct, port, delete, block or withdraw consent to the processing of certain Personal Information (without affecting the lawfulness of processing based on consent before its withdrawal), by contacting us as detailed below. In particular, you have the right to object to our use of your Personal Information. Please contact us below to exercise such rights. Please note that we need to retain certain Personal Information as required or permitted by applicable law.

### **Links to other internet sites**

The website provides links to other third-party internet sites. Despite these linkages, this Privacy Policy applies to our Services only. Please read the privacy policy of each unrelated internet site that you visit. Horton is not responsible for the privacy practices of such Internet sites.

### **Changes to our privacy policy**

We reserve the right to change or amend Privacy Policy from time to time in its sole discretion, as permitted by applicable law. If we make a material change to this Privacy Policy, we will post the revised policy on this web page, and obtain your consent if required by applicable law. Nothing in

this Privacy Policy is intended to create an agreement or contract between Horton and any person or entity using this website or providing any Personal Information.

**Contact information**

If you have any questions about this Privacy Policy, please  
**contact [amsterdam@hortoninternational.com](mailto:amsterdam@hortoninternational.com)** or by postal mail at:

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1070 AX Amsterdam  
The Netherlands