

DATA PROTECTION STATEMENT

Drafted on 07/05/2018

1. Name of the register

Executive search register

2. Controller

Name: Horton International Oy ("Horton" or "we")
Address: Annankatu 25, 00100, Helsinki
Other contact information: +358 10 231 3638
Email: helsinki@hortoninternational.com

3. Contact person for the register

Name: Mervi Sirén
Address: Annankatu 25, 00100, Helsinki
Other contact information: +358 41 433 5911
Email: siren@hortoninternational.com

4. The purpose for the processing of personal data

Personal data will be collected and processed so that Horton International Oy can serve its customers who acquire executive search or other services from Horton.

The data can also be used execution of other Horton services and for communicating with candidates ("candidate", "data subject" or "you").

The collection and processing of personal data is always based on legislation, customer or service agreement, the legitimate interest of Horton or the consent of the data subject.

5. The content of the register

The data collected may include information such as name, picture of you, contact information, place of residence, historical compensation data, data revealing your working history, education, information provided by you on yourself, agreements signed with Horton, information provided by people giving references about you, a consultant subjective view of you as a candidate for the given executive search assignment. Data created and collected during communication includes information on the communicating parties, time of the connection, routing information, data transfer protocol, format of the connection.

Principally, Horton will not collect sensitive data such as racial and ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, sexual preferences, health, illness or disability to the personal data files of Horton.

6. Regular sources of information

We collect personal data from open public sources such as LinkedIn, news, tax officials, company websites, from candidates themselves,

7. Regular destinations of disclosed data

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.

When transferring personal data to third parties, Horton always agrees in a separate written agreement the rights and obligations of the service provider in accordance with the applicable laws.

8. Transfers of data to countries outside the European Union or the European Economic Area

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.

9. The principles how the data file/register is secured

All data will be stored electronically or into paper as physical documentation.

Information will be collected to Horton Executive Search database. Only administrators will have access to the database. Such access is protected with user right management. User interface will only show data that is necessary for the tasks of the respective person. The views of the user interface as well as the access rights have been defined based on role and user.

We will use appropriate technical and organizational means to secure the personal data from inappropriate access, accidental or unlawful destruction, amendment, distribution and transfer of personal data as well as from other unlawful processing.

10. Information storage time

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 two years, after which we will renew consent for data processing or delete the personal data (unless due to a statutory special retention obligation).

11. What are your rights?

We will ensure that we will inform the data subjects appropriately and in a timely manner of the processing of data and their rights regarding data processing. The data subject has the right to inspect data, the right to be forgotten, the right to data portability, the right to object automated individual decision making such as profiling, demand the rectification and the deletion of data, as well as the right to object and restrict the processing of data belong to the rights of a data subject.

We act in a transparent manner. We will ensure in our operations that the rights of the data subject will be taken care of, and that the data subjects are appropriately informed, and that his/her requests are responded swiftly.

If you want to utilise your rights stated above, please contact us with the contact information specified above.

In addition to the rights described above you are entitled to make a complaint to the data protection authority, especially in the European Union country where you have your domicile or permanent work place or where the claimed breach of data protection regulation occurred. In Finland, this authority is the data protection ombudsman.

12. Amendments to this data protection statement

Horton may from time to time amend this data protection statement without prior notice to you.