

GDPR Privacy Notice

1. Introduction

- 1.1. Executives Place Ltd. trading as Not Actively Looking (**we** or **us**) is committed to protecting your personal information and respecting your privacy.
- 1.2. This Privacy Notice, together with any other documents referred to in it, sets out the basis on which any personal data that we collect from or about you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we treat it.
- 1.3. For the purpose of the Data Protection Act 1998 and the General Data Protection Regulation, the data controller is Executives Place Limited (trading as Not Actively Looking), a company registered in England (company number 7100165) of 137-139 Brent Street, London NW4 1DG United Kingdom.
- 1.4. We may update this Privacy Notice from time to time. Any changes we make in the future will be posted on our website at www.notactivelylooking.com (the **Website**). Please check back regularly to see any updates or changes to this Notice.

2. Data Protection Officer

2.1. The contact details for our Data Protection Officer are as follows:

Anthony Harling

Data Protection Officer

Email: Anthony@notactivelylooking.com

Telephone: 01428 788345

Post: Not Actively Looking, 37-39 Brent Street, London NW4 1DG

2.2. It is the responsibility of the Data Protection Officer to keep our organisation and our staff informed and advised about their obligations to comply with data protection laws, to monitor compliance with those laws, to advise on data protection impact assessments, to train staff and conduct internal audits, and to be the first point of contact for supervisory authorities and for individuals whose personal data we are processing.

3. Particulars of processing

3.1. We process personal data about a range of data subjects, and for a range of purposes.

3.2. The categories of person about whom we process personal data are described in more detail in the Particulars of Processing that are set out in the Schedule to this Privacy Notice.

3.3. When someone visits the Website, we place small text files known as “cookies” on their computer. These are widely used in order to make websites work (or work more efficiently), as well as to provide information to the owners of the website, and in some cases to collect personal information about the individual

website visitor. We also used a third party service, Google Analytics, to collect certain internet log information and details of visitor behaviour patterns. You can read more about how we use cookies in our Cookies Policy.

4. Your rights as a data subject

4.1. This Section 4 sets out the rights that you have as a data subject, by reason of the General Data Protection Regulation.

4.2. You have the following rights:

4.2.1. The right to request access to the personal data that we hold about you;

4.2.2. The right to request rectification of the personal data that we hold about you;

4.2.3. The right to request erasure of the personal data that we hold about you;

4.2.4. The right to request restriction of processing about you;

4.2.5. The right to object to processing; and

4.2.6. The right to data portability.

If you wish to invoke any of the above rights, please notify our Data Protection Officer using the contact details set out in Section 2 above. Please include the words DATA PRIVACY REQUEST in the subject line of your email, or at the top of your letter.

- 4.3. Where our processing of personal data is based on your having given consent, you have the right as a data subject to withdraw that consent at any time. If you wish to invoke this right, please notify our Data Protection Officer using the contact details set out in Section 2 above. Please include the words DATA PRIVACY REQUEST in the subject line of your email, or at the top of your letter.
- 4.4. You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Office of the Information Commissioner, full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

5. Contact details

- 5.1. You can contact our Data Protection Officer if you have any other questions or concerns about personal data and privacy matters, using the contact details set out in Section 2 above.
- 5.2. Please include the words DATA PRIVACY REQUEST in the subject line of your email, or at the top of your letter.

Schedule

Particulars of Processing

Category of data subject	Candidates who have registered directly with Not Actively Looking as potential candidates.
Categories of personal data that we process	Name Job Title Industry sector Role classification Details of previous or current employment Salary information Future salary expectations Future job preferences and/or aspirations Contact information such as email addresses and telephone numbers Demographic information such as post code, preferences and interests The minimum information required to enable payment via third-parties such as PayPal and Stripe IP address (automatically collected) Web browser type and version (automatically collected) Operating system and version (automatically collected) A list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected)
Source of information	Most of the above personal data is received direct from the data subject. However, where shown above, certain technical information will be collected automatically via the Website.
Purposes of the processing	We process the personal data listed above for the purposes of administration of our contract with the individual data subject and the provision of services to them. We may also process this personal data to ensure system effectiveness, optimisation, and to maintain, protect and improve the services that we offer to the individual data subject and other users of the Website.

Lawful basis of processing	The lawful basis of processing is that the processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract.
----------------------------	--

Recipients of the personal data	Personal data may be disclosed to search firms whom the data subject has selected to have sight of their personal details.
---------------------------------	--

Overseas transfers	All personal data that Not Actively Looking holds is stored within the EU. However, the data subject may give sight of their personal data to search firms with offices or affiliates outside the EU.
--------------------	---

Duration of processing	Personal data will be processed for as long as the data subject continues to have a contract with Not Actively Looking.
------------------------	---

<p>Is the provision of this personal data a statutory or contractual requirement, or a requirement necessary to enter into a contract?</p> <p>If so, is the data subject obliged to provide the personal data in question?</p> <p>What are the possible consequences of failure to provide such data?</p>	<p>The provision of this personal data is a requirement necessary for Not Actively Looking to administer its contracts with candidates and search firms.</p> <p>You are not obliged to provide the personal data in question. However, if you do not provide the personal data, we will be unable to perform any contract we have with you for the provision of Not Actively Looking services. Some basic level of information is mandatory in the registration process.</p>
---	--

<p>Is there any automated decision-making done using the personal data (including profiling)?</p> <p>If so, (a) what logic is involved, and (b) what are the significance and envisaged consequences of the processing for the data subject?</p>	<p>Not Actively Looking does not use any automated decision-making algorithms. However, we use candidate and search firm data to recommend appropriate connections and to rank a candidate's suitability for a specific role. The candidate is responsible for manually making the connection based on the recommendation, and the search firm is responsible for manually choosing the final short list of candidates from the ranked set of results.</p>
--	--

Plans for further processing	We will continue to evaluate opportunities to improve the effectiveness of our service through the use of profiling. Wherever there is a material change to the nature of our profiling (or any other processing that we undertake), the data subjects will be informed accordingly and our policy will also be revised.