

FIVE RIVERS GLOBAL LTD
Brief Overview

1) Data we collect	We collect personal contact information, information from your CV, on-line profiles and relating to recruitment processes you have been involved in, correspondence between us and you and correspondence between us and clients/candidates about you, information about compensation, benefits and restrictive covenants relating to you or recruitment processes you are involved in
2) How long we hold your data	We hold data for a maximum of 6 years
3) How we use your data	We use your information to match you to relevant opportunities, to effectively market you to opportunities that you choose to be submitted to and to enable us to contact you
4) How we share your data	We only share your personal information with parties outside of Five Rivers Global LTD and affiliates when you give us permission to do so
5) Your choices	You can opt out of being marketed with opportunities. You have additional rights over your data under GDPR
6) Changes to this policy	You can learn of any changes to this policy on our website: www.fiveriversglobal.com
7) Contact us	You can reach us on info@fiveriversglobal.com

1) Data we collect

We collect information when communicating with you in person, on a telephone, text messaging services and via email. We also collect information relating to recruitment processes you are involved in which may be about you. We also collect information from documentation that you provide us with, specifically your curriculum vitae but also contracts of employment and information from publicly available websites. We also collect compensation information that you communicate to us and information relating to the terms of your employments such as restrictive covenants.

We collect personal contact information to enable us to reach you. We operate a specialised executive search service and as such we need to be able to proactively approach potential candidates with whom we have had communications in the past to alert them to the existence of a relevant opportunity.

We collect information from your CV, on-line profiles and relating to recruitment processes you have been involved in to enable us to accurately match relevant opportunities to your profile and then reach out to alert you to these opportunities.

We collect correspondence between us and you and correspondence between us and clients/candidates about you to enable us to keep records for legal and business purposes.

We collect information relating to compensation, benefits and the terms of your employments for legal and business reasons and because our clients require that we do so.

2) How long we hold your data

We hold personal information on individuals for a maximum of 6 years. Beyond this we may anonymise the data and continue to hold it.

The reason that we hold data for 6 years is that the areas we cater to are highly specialised and people generally do not move roles frequently. In order to continue to be able to match passive candidates with relevant opportunities we require data from up to 6 years ago.

3) How we use your data

We use your data:

- to accurately match your profile to relevant opportunities
- to effectively market you as a candidate to the opportunities that you decide to go forwards with
- to contact you about new relevant opportunities and on-going recruitment processes

4) How we share your data

We only share your personal information with parties outside of Five Rivers Global LTD and affiliates when you have given us express permission to do so and we will not share it beyond these parties. Express permission may come in the form of an email, text message, telephone call or in-person but we will always seek it overtly before sharing your personal information.

We may, at our discretion, share completely anonymised or aggregated sets of data with third parties without gaining consent of individuals.

5) Your choices

You can let us know if you would like us not to market any further opportunities to you. You can let us know to put a temporary or permanent hold on this. You let us know this by contacting us on info@fiveriversglobal.com

If you are a resident of the European Union ("EU") or the United Kingdom ("UK"), you may have certain additional rights, as detailed below. For purposes of this notice, "personal data" has the meaning ascribed in the EU General Data Protection Regulation .

Processing bases and consequences

To process your personal data, we rely on the following legal bases:

- For the performance of a contract we have with you (such as if you request that we represent you to a client as part of a recruitment process).
- For compliance with a legal obligation to which we are subject (such as tax obligations and when we are obliged to comply with lawful requests from competent authorities such as law enforcement).
- For the purposes of our legitimate interests (such as being able to match you and then contact you with relevant opportunities and for fraud detection), provided that such processing does not outweigh your rights and freedoms.

The processing may also be pursuant to other applicable legal bases for data processing, especially provisions set out by Member State law. To the extent that a legal ground described above would not apply to processing of your Personal data by us, we will seek your consent for such specific purpose in accordance with applicable law.

Your rights

To the extent a specific element of our processing of your personal data relies upon your consent, you may withdraw such consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. You may let us know this on the contact us part of our website: www.fiveriversglobal.com

If you wish to object to the processing of your personal data on the basis of legitimate interest and no opt-out mechanism is available to you directly, please contact us at www.fiveriversglobal.com

If you do not provide us with certain of your personal data, we may not be able to fulfill the requested purpose of collection, such as to respond to your queries. However, unless otherwise specified, not providing your personal data will not result in legal consequences for you.

Additional data privacy rights:

Below please find information on additional rights you may have under applicable law:

- **Access:** You may request that we confirm whether or not we are processing your personal data. If we are, you may request a copy of your personal data, which we will provide free of charge, together with information about such processing, such as the purposes of the processing and the categories of personal data concerned. However, this is not an absolute right and the interests of other individuals and organisations (such as clients that hold us to non-disclosure agreements) may restrict your right of access. For further copies, we may charge a reasonable fee based on administrative costs. We may decline requests which are excessive, particularly if repetitive. We may ask for legal proof of your identity before providing you with access to any data.
- **Rectification:** You may also ask us to change, update or fix your personal data in certain cases, particularly if it's inaccurate. You may also ask us to update your data by providing us with an up to date copy of your CV.
- **Erasure:** You may request the erasure of your personal data. We may ask for legal proof of your identity to perform this task.

- **Restrict Processing:** You may ask us to restrict the processing of your personal data under certain circumstances, such as if your Personal Data is inaccurate or unlawfully held.
- **Data portability:** You may ask for a copy of the personal data you provided to us in a structured, commonly used and machine-readable format and you may have the right to transmit this data to another entity.
- **Object:** You may object to the processing of your personal data on grounds relating to your particular situation under certain circumstances, for example for direct marketing. If you have a right to object and you exercise this right, your personal data will no longer be processed for such purposes by us, unless there are overriding compelling legitimate grounds for the processing or as otherwise provided under applicable law. You may let us know this on the contact us part of our website: www.fiveriversglobal.com

Please note that these rights may be limited under applicable laws.

Please note that we may need to retain certain information for recordkeeping purposes, to complete any transactions that you began prior to your request, or for other purposes as required or permitted by applicable law.

6) Changes to this policy

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