



## DE BOER & ASSOCIATES

SUCCESSFUL IN EXECUTIVE SEARCH

De Boer & associates Privacy Notice

Last Updated: May 18, 2018

De Boer & associates (collectively “DBEA,” “we,” or “our”) take data privacy seriously. This Privacy Notice (“Notice”) explains who we are, how we collect, share, and use personal information, and how you can exercise your privacy rights.

This Notice covers personal information we collect (capitalized terms are defined below under Section 1, Key Terms):

- in connection with our search, assessment, leadership advisory, succession, and other services (the “Services”), whether we are in the process of recruiting you as a Candidate for a role
- (a) with a Client, assessing you as an employee of a Client, identifying Candidates for you as a Client, retaining you as a Vendor, or engaging with you as a Source or Referee in relation to one of our Candidates (see Section 2); and
- (b) when you visit our website (<http://www.dbea.nl>) (the “Website”) (see Section 3).

### Sections

To make it easier to navigate to the parts of this Notice that directly apply to you, we have divided the Notice into the Sections below. While we encourage you to read the entire Notice, we strongly recommend that you review Section 1 (The Basics), Section 4 (General Information), and any other Section that applies to you:

#### Section 1 - The Basics (For Everyone)

- About Us
- Key Terms

#### Section 2 – Data Collected Via Our Services (For Clients, Candidates, Referees, Sources, and Vendors)

- What Personal Information Do We Collect?
  - o Candidate Data
  - o Client Data
  - o Referee Data
  - o Source Data
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- How Do We Use Your Personal Information?
  - o Candidate Data
  - o Client Data
  - o Referee Data
  - o Source Data
  - o Vendor Data

### Section 3 – Data Collected Via Our Website (For Visitors to our Website)

- What Personal Information Do We Collect?
- How Do We Use Your Personal Information?

### Section 4 – General Information (For Everyone)

- How We Share Your Information
- International Data Transfers
- Legal Basis for Processing Personal Information (If You Are Resident in the EEA)
- Your Data Protection Rights
- How Long Do We Keep Your Personal Information?
- How Do We Keep Your Personal Information Secure?
- Updates To This Notice
- How To Contact Us

If you have any questions or concerns about our use of your personal information, please contact us using the contact details provided under the Section headed “How To Contact Us” below.

## **1. THE BASICS**

### About Us

De Boer & associates is an executive search and leadership advisory firm. We work with public and private organization across all industries. Our Office is located at Utrechtseweg 66-68, Zeist, The Netherlands.

### Key terms

In this Notice, the following terms have the meanings set forth below:

“Client” means any of our clients and their employees who are looking to recruit or assess executives and to whom we provide the Services.





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“Candidate” means any candidate, applicant, prospect, or Client employee who is considered, evaluated, or assessed by DBEA in connection with the Services.

“Referee” means any individual who provides employment or personal references for a particular Candidate.

“Source” means any individual who helps to identify and provide intelligence about a potential Candidate.

“Vendor” means any entity other than DBEA that provides products or services to DBEA pursuant to a contract with DBEA.

### **2. DATA COLLECTED VIA SERVICES**

This Section applies to information that we collect and process about Candidates, Clients, Referees, Sources, and Vendors.

#### What Personal Information Do We Collect?

##### CANDIDATE DATA

Information Candidates provide to us: If you are a Candidate, you may provide personal information to us, for example, when email your résumé to an DBEA search consultant, speak with an DBEA search consultant, or communicate with us in any way in connection with the Services. Further, as described below, we may obtain information about you from other sources.

You are not obligated to provide DBEA any information or participate in any of the Services we offer. As such, we will consider any information we collect directly from you as having been provided voluntarily. If, however, you are unwilling to provide us with certain requested information, please understand that this may limit our ability to consider you in connection with the Services.

#### The information we may collect for all Candidates typically includes:

- Contact details: such as your name, e-mail address, postal address, and telephone number.
- Résumé information: such as your contact details, employment history, educational history, professional qualifications, as well as languages and other skills and activities.
- Identification data: such as your civil/marital status, photograph, date of birth, gender, national origin, national identifier (i.e. driver’s license or ID/passport number).
- Lifestyle preferences and personality profile: such as community involvement and memberships, hobbies, social activities, and/or individual preferences, intellectual capacity, personality, behavior, executive competencies, and/or character traits.





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- Other information: such as your prior military service, compensation and benefit details, performance history and any other relevant information you may choose to share with us. We also keep a record of our contact history with you.

Information we collect from third party sources about Candidates: We may collect any of the above personal information about you from publicly available sources, and third parties, including, under the following circumstances: (i) Sources and Referees may disclose personal information about you; (ii) our Clients may share personal information about you; (iii) we may obtain information about you from publicly available third party sources (e.g., LinkedIn, news reports, press releases); and (iv) we may source personal information about you from our third party data providers. When we obtain information about you from third party providers, we take appropriate steps to ensure that such third parties are legally permitted or required to disclose such information to us.

Information Clients provide to us: Our Clients may provide us with personal information about certain Candidates in connection with our Services (for example, they may provide us with a list of Candidates they would like us to assess through the Services). We typically process this personal information as a processor on our Client's behalf. We use that information to provide the Services to our Client and as instructed by our Client. Under these circumstances, it is our Client, as the controller, that controls what personal information about you we collect and how we use it. If you have privacy-related questions or concerns about a Client's privacy practices or the choices a Client has made to share your information with us or any other third party, you should reach out to the Client or review their privacy policies. We are not responsible for the privacy or security practices of our Clients, which may differ from those set forth in this Notice.

### CLIENT DATA

Information Clients provide to us: We need to collect and use information about you or individuals at your organization in the course of providing the Services to you. We generally only need to have your contact details or the details of individual contact(s) at your organization (such as name, telephone number, email address, and job title) to ensure that our relationship runs smoothly. We also hold information relating to your online engagement with Candidate profiles through our Client applications and will keep a record of our contact with you. We may also hold extra information about you that someone in your organization has chosen to tell us.

Information we collect from third party sources about Clients: Where appropriate we may seek more information about you or your colleagues from other sources generally by analyzing public online and offline media.





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### REFEREE DATA

Information Referees provide to us: In securing a reference from you about one of our Candidates, we may process your contact details (such as name, email address, and telephone number). We may also process certain professional details (such as your job title, occupation, academic and professional qualifications, and employment history) and your connection to the Candidate (such your relationships to, experience with, and opinions about the relevant Candidate). We generally ask the Candidates to provide us with much of this information but we may supplement it with information we collect about you from publicly available sources (such as LinkedIn) or by asking you directly.

### SOURCE DATA

Information Sources provide to us: We may process your contact details (such as name, email address, and telephone number), professional details (such as job title, occupation, academic and professional qualifications, and employment history) and information about your connection to our Candidate (such as your relationship to, experience with, and opinions about the relevant Candidate). We may collect this information directly from you and/or from publicly available sources (such as LinkedIn). In some cases, we may collect the information from our Candidates.

### VENDOR DATA

Information Vendors provide to us: We need a small amount of information from our Vendors to ensure that things run smoothly. We need contact details of relevant individuals at your organization so that we can communicate with you.

### **How Do We Use Your Personal Information?**

We may use the personal information we collect through our Services in a number of ways.

### CANDIDATE DATA:

We typically use Candidate data for the following purposes:

Search & Leadership Advisory Activities: to provide our Clients with the Services, including assessing your suitability for executive roles with a Client; contacting you about board and executive search or assessment assignments conducted for Clients; sending your information to our Clients; and/or verifying the details you have provided (such as through psychometric evaluations or by requesting information from third parties (e.g., Referees).

Where appropriate we will use this information to provide our Clients with diverse pools of qualified Candidates. We may also disclose this data (suitably anonymized where appropriate) to Clients where this is contractually required or the Client specifically requests such information to enable them to comply with their own employment processes but again, only where in accordance with applicable local law.







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### CLIENT DATA:

We typically use Client data for the following purposes:

Search & Leadership Advisory Activities: to provide the Services to your organization; to manage our relationship and account with you and your organization.

### REFEREE DATA:

We use Referee Data to obtain your opinion regarding Candidates in the course of providing the Services to our Clients.

### SOURCE DATA:

We use Source Data to identify and gather information on potential Candidates in the course of providing the Services to our Clients.

### VENDOR DATA:

We typically use Vendor Data: (i) to store (and update when necessary) your details in our database, so that we can contact you in relation to our agreements; (ii) to obtain support and services from you.

### **3. DATA COLLECTED VIA OUR WEBSITE**

This Section applies to personal information that we collect and process through our Website in the usual course of our business.

#### What Personal Information Do We Collect?

Information you provide to us: Certain parts of our Website may ask you to provide personal information voluntarily, for example, we may ask you to provide your contact details (like your name, email address, and phone number).

#### How Do We Use Your Personal Information?

We typically use the personal information we collect through our Website in the usual course of our business for the following reason: to respond to a request that you sent us, such as a request for information about our Services.





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#### **4. GENERAL INFORMATION**

##### How We Share Your Information

We may share your personal information with the following types of third parties for the purposes described in this Notice:

- Your information is maintained on DBEA's database, which is secure and accessible only to DBEA's employees.
- In the case of Candidates, Referees, and Sources, we may share your information with Clients who will need to process your information for the purposes we have described in this Notice.
- For Sources and Referees, we endeavor to keep your information confidential from the Candidates you discuss with us, but under limited circumstances, your information may be disclosed to them.
- We may share your information with third party service providers (our Vendors) who perform functions on our behalf (such as accountants and outsourced IT).

Please be assured that we do not sell your information to third parties or use the information for purposes that are incompatible with those set forth in this Notice.

##### International Data Transfers

Our servers are located in the Netherlands. This means that when we collect and process your personal information locally.

Our Contractual Clauses with our IT and other relevant providers are available upon request.

##### Your Data Protection Rights

You have the following data protection rights:

- If you wish to access, correct, update, or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided below. When asked to remove a record from our database, DBEA will retain minimal personal information in order to prevent future contact, to keep a record of the information disclosed to our Clients and Candidates, and to preserve DBEA's interests in accordance with any applicable legal requirements.





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- Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. If you withdraw your consent to our Notice, you will not be able to be a part of a DBEA search, assessment or leadership project.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

### How Long Do We Keep Your Personal Information?

We will retain information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with the Services or to comply with applicable legal, tax, or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will delete it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

If you have any questions about how long we retain your personal information, you may contact us using the contact details provided below.

### How To Contact Us

Please feel free to contact us with any comments, questions, complaints, or suggestions you might have regarding the information or practices described in this Notice.

De Boer & associates  
Utrechtseweg 66-68  
3704 HE Zeist

Telephone: 0031- 30 699 4738

You may contact us by sending a message to [info@dbea.nl](mailto:info@dbea.nl)

