

STANTON CHASE



# Privacy Notice

**Stanton Chase International Bulgaria Ltd.**

The principles described in this Privacy Notice document are handled in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). The aim of these principles is to provide participants with basic information on the processing of Personal Data, their protection and methods of processing.

Glossary of terms used in this Privacy Notice:

- **“Personal Data“** means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **“Processing“** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **“Consent“** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- **“Controller“** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data;
- **“Processor“** means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the controller;
- **“Recipient“** means a natural or legal person, public authority, agency or another body, to which the Personal Data are disclosed, whether a third party or not.

This document is intended to inform you about the ways we handle your Personal Data as well as to ensure you they are of the utmost importance for us therefore we constantly protect them. Our employees treat your Personal Data complying with the applicable legislation of the Bulgaria and the EU. To ensure we always handle your Personal Data in the best and most secure way possible, our IT systems and processes are being regularly revised by external professionals. Being fully aware of the fact, your Personal Data do not represent our property, we truly appreciate the trust you have put in us through sharing them with us. Whether we obtain them from public sources or you entrust them to us, we always inform you about this fact. In case we wanted to use your Personal Data for other purposes than those stated here, we would ask for your consent with such Personal Data processing (lacking other lawful basis).

## Who are we and who can access your Personal Data?

We would like to be sufficiently transparent with you, therefore we inform you about who can access and process your Personal Data, who may contact you for the purposes described below. The data controller administering your Personal Data within the territory of the Bulgaria is the Stanton Chase International Bulgaria Ltd. company, with its registered office at 83 Ekzarh Yosif Str., entr.2, floor 2, Sofia 1000 which is authorized to provide your Personal Data to the other offices of the Stanton Chase global franchise network, where relevant and appropriate and always subject to appropriate contractual and security safeguards. You can find a regularly updated list of all the Stanton Chase offices at the following address:



<https://www.stantonchase.com/international-locations/>

**We also store your Personal Data at other companies (Processors).** These Processors maintain the utmost secure internal systems and storage for us. The security of our systems is provided by our suppliers, which may also have access to your Personal Data. To prevent any unauthorized processing or a processing you could not have expected, the activity of these suppliers is under permanent control while they are bound by the contractual terms and the processing contracts. When transmitting and processing your Personal Data, we strictly follow the applicable codes (the code of conduct) of the Association of Executive Search Consultants (AESC). Please find the complete version of these documents we fully adhere to at the following addresses:

<https://www.aesc.org/profession/professional-code>  
<https://www.aesc.org/profession/candidate-bill-rights>

**We never proactively disclose your Personal Data.** Your Personal Data remains completely safe with us. If we need to transfer your Personal Data to another recipient, we will inform you of this fact and always seek your consent prior to transferring your Personal Data.

**What happens if you don't provide us with your Personal Data?** Should such a situation arise, we will not be able to conclude a contract with you and/or provide you with our services.

## We keep your data safe and we want to tell you how we do it!

The Personal Data entrusted to us, as well as the ones obtained from the public sources remain under constant physical, electronic and procedural control. We ensure maximum possible protection of the processed data by using the frontier control, technical and security mechanisms, efficiently preventing your Personal Data from any unauthorized access, transfer, as well as their loss, damage or other potential misuse. Every person handling your Personal Data, whether within their work or contractual obligations, is subject to legal or contractual obligation of secrecy.

Handling your Personal Data is essential for our work - we want you to know all our processing operations are undertaken in accordance with the law.

In order to be able to offer you our service, we do have to handle your Personal Data, therefore a majority of processing operations is based on the contractual terms agreed by you and the Stanton Chase company.



There are other types of Personal Data, we may use only based on your freely given consent, which does not affect the other services we provide for you. Certain requirements are also set by the legislature - we also process the information required by the laws of Bulgaria.

### We use the additional consent mainly

- when reaching out during our marketing campaigns, eventually to inform you about the opportunities the labour market currently offers. You can withdraw your consent at any time without any negative impact.

### We are acting under the contract mainly

- when verifying your attendance at an event you have freely subscribed to
- when processing your CV, which we standardly process to a limited extent only
- when maintaining the job candidate database, to be able to offer you the most suitable job position, while sparing your valuable time and finances

### We use our legitimate interests mainly

- when verifying the information shared in your CV, namely the reference letters, provided by your references, which enables us to provide you the most suitable occupation as well as to protect our clients
- when viewing your profile through open sources (LinkedIn, Facebook, etc...), where you share information about yourself, while always seeking your consent prior to disclosing your Personal Data to clients for a particular job offer

**Should you disagree with processing or should you have any questions, please do not hesitate to contact us.**

Your trust in our services is essential for us, and you can contact us at any time. Once we verify your identity, we enable you to withdraw your consent free of charge.

Right of access	We will provide you with the information about the handling of your Personal Data throughout the period we have possessed them. We cannot provide you with all the information though, namely as some may violate our intellectual property rights or invade privacy of other persons.
Right to be forgotten	We will erase or anonymize the Personal Data you provided us with.
Right to restriction of processing	If you object to processing carried out by us, we will restrict the processing during the period of validity of the objection. We will also restrict the processing, if the accuracy of the Personal Data is contested by you, for a period enabling us to verify the accuracy of the Personal Data. Alternatively, the restriction of processing will apply if the processing is unlawful and you oppose the erasure of the Personal Data and request the restriction of their use instead.
Right to object the processing	You have the right to object at any time to processing of personal data for direct marketing purposes. The right to object also applies to processing of your Personal Data for the purposes of the legitimate interests pursued by us, unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms.
Right not to be subject to automated decision-making, including profiling	We do not use automated decision-making recently therefore we cannot offer you assertion of this right.
Right to data portability	We will be happy to provide you with a machine-readable copy of the Personal Data you have shared with us. However, we cannot provide you with all the information, as some may violate our intellectual property rights or invade privacy of other persons.

Should you wish to assert your rights, you can contact us via email [sofia@stantonchase.com](mailto:sofia@stantonchase.com) or via our central telephone number +359 962 2931. You can also visit us at the following office address: 81 B (Б) Bulgaria Blvd., fl. 6, Sofia 1404, and we will gladly handle all your requests immediately. We would like to inform you though, that the assertion of your rights may be subject to a charge, in case we would see you already hold respective information or the number of your requests would be disproportionately high in relation to the time limit you have set in this regard.

## We would like to inform you how we use your Personal Data in case you entrust them to us.

As our main focus is the job placement service, we conduct related activities trying to deliver the service in the highest quality possible. This concerns namely the following types of processing activities:



- tests and assessments, in order to compare your professional qualities with the ones required for a particular job position;
- direct marketing (world news etc.), the aim of which is to keep you informed and offer you new work opportunities;
- CV processing, but we usually work with excerpt of the most crucial information valuable for us, as well as our clients, offering new work opportunities;
- public event management, enabling us to be in closer contact with you, and introduce you to new approaches and opportunities created by the labour market;
- maintaining our relationship, by conducting professional interviews, planning meetings and updating all the information in our information system; we will include you in the information system, after you contact us through our website.
- Marketing campaigns, incl. surveys, articles, analysis related with business activities of Stanton Chase, as well as sharing information regarding trainings, workshops, conferences and business events.

## If you share your Personal Data with us, we will process only the ones we truly need and have to process.

We handle your Personal Data carefully and responsibly, with special regard to your safety. In order to offer you the best services possible, we have to maintain certain Personal Data about you. We keep the following types of information in our system:



- **personal identification data**, such as the name, surname, address, telephone number, and other contact information you share with us;
- **personal information**, such as age, gender, nationality;
- **current job situation**, such as the current employer, key job responsibilities, specialization and the professional experience you have acquired within your current work position;
- **pictures**, that cannot be considered biometric data and that you have included in your CV, we do not provide photographic services;
- **professional experience**, expertise, qualifications, certificates and references.

You may not share all these kinds of information directly, though we may obtain them during the interviews or during your visit of our website, therefore we want to inform you about their typical nature:

- **IP addresses and cookies**, which we may obtain based on your visit of our website and which we use solely for the purpose of securing our systems. We do not use these kinds of information for the purpose of behavioural advertising or other kind of profiling of you or your behaviour;
- **psychological tests**, as our clients may need to know some information about your character and your eligibility for the position;
- **salary or invoiced hourly rate**. We keep this information about you, in order to be able to react promptly to the eventual offers that may interest you, and offer you enhanced services.

In case we obtain the information about you from a different source than from yourself, we inform you about it and you can assert your rights. We provide you with the information at the latest **one month** after we obtain it and before the start of the processing process. We would like to ensure you, we will not process any information of such type prior to informing you.

## Where is your information held?

Your data is held in the UK or European Union but in some circumstances we do transfer your information out of these jurisdictions as follows: (i) for example if we are using processors based or hosting your information outside the territory; (ii) if on a one off basis you instruct us to transfer data to a client or other person outside of the territory; (iii) where information is transferred to other Stanton Chase offices based outside of the territory. For any such transfer we make sure that appropriate safeguards are in place in accordance with relevant law. With processors, we generally rely on specific contract terms approved by the European Commission and for intra group transfers we have in place an intra group transfer agreement which incorporates these and other contractual protections to ensure that your information is held to equivalent rules and standards to UK and European privacy laws.

## We do not keep your information forever. For how long will we hold it?

We will not keep your information forever, but for the period necessary to be able to offer you new work opportunities. In accordance with our business purpose, we store your Personal Data for a period of **maximum 5 years** since our last contact. In case we have the legal obligation to store the information about you for a longer period of time, we will store it longer, but if you assert your rights, we will inform you about it. You can always request the restriction of processing or erasure of your Personal Data. You can also withdraw your consent with the Personal Data processing, which will be reflected immediately. Please take note, that as a result of withdrawal of consent, we will not be able to offer you our services, requiring Personal Data processing anymore.



## Do we always process the most up-to-date information available?

We regularly update Personal Data we keep about you. Taking into account your situation, as well as your experience may evolve in the course of time, we encourage you to regularly update your Personal Data and avoid processing incomplete or out-dated information about you. We would highly appreciate it, if you would help us maintain our contacts database up to date, by informing us about eventual changes in your Personal Data through email, telephone or personal contact.





## Final provisions

All legal relationships following from or relating to the Personal Data processing shall be governed by the legislation of the Bulgaria, regardless of where they were accessed from. Any potential disputes arising from the privacy protection between you and the Stanton Chase company shall be referred to and resolved by the Bulgarian courts under the Bulgarian legislation.

We may and will regularly amend the text of this Privacy Notice document. We will notify you in advance of any such change by email at least 30 days before the change takes effect.

This Privacy Notice shall take effect on May 25<sup>th</sup>, 2018 and was lastly updated on May 17<sup>th</sup>, 2018.

# STANTON CHASE



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