



PRIVACY POLICY

Last updated February 18, 2020

Thank you for choosing to be part of our community at Ripple In Limited, doing business as The Red Pineapple (“**The Red Pineapple**”, “**we**”, “**us**”, or “**our**”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at liv@theredpineapple.com

When you visit our website www.theredpineapple.com, and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites and our services.

This privacy policy applies to all information collected through our website (such as www.theredpineapple.com), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the “**Services**”).

In this policy, “**The Red Pineapple**” or “**we**” refers to the company at LHC, T18 Tideway Yard, 125 Mortlake High Street, London SW14 8SN (Company Number 07838002), (together with our holding company) and “**Platform**” means our website at www.theredpineapple.com

In this policy, “**personal information**” refers to any data, information, or combination of

data and information that is provided by you to us, or through your use of our products or services, that relates to an identifiable individual.

The Red Pineapple (“we”, “us”) is committed to keeping your information secure and managing it in accordance with our legal responsibilities, under the privacy and data protection laws applicable wherever we operate in the world, as well as the General Data Protection Regulation (Regulation (EC) 2016/679 (“GDPR”) in the European Union (“EU”).

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

1. TO WHOM DOES THIS POLICY APPLY?

We offer executive search (“**our services**”) to a wide range of clients globally. In order to provide such services, The Red Pineapple collects, uses and stores such needed personal information that you provide.

This policy therefore applies to you if you are a candidate being considered for one of our clients or an individual that we are evaluating as a potential employee of one of our clients, a client, and/or a source or a referee in relation to a candidate.

For the purposes of this policy you are a **candidate(s)** if you are considered as an applicant, potential candidate or an employee of a client. In order to conduct our search, we may ask you to provide personal information to us which could include your contact information (telephone number, e-mail address); professional experience; educational history; social activities;

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Registered number: 07838002. Registered office: Ripple In Limited, T18 Tideway Yard, 125 Mortlake High Street, London SW14 8SN



compensation details; skills, competencies and proficiencies; professional or personal profiling; languages spoken; personal data (civil status, nationality), and interview notes. We follow all legislation when collecting such personal information which could be provided directly by you or through public sources, third party references and background checking.

We consider you a **client(s)** if you as an individual, organisation a, business or entity, request us to perform any of our services whereby we collect and use personal information about your organisation including employees within your company. Data collected from you may include contact details and any personal information required in relation to the executive search.

You are a **referee** if you provide us with a personal or professional reference for a candidate and as a **source**, you would provide us with information about a candidate. We may ask you to provide personal information such as your title, professional experience and qualifications, as well as how you are connected to the candidate. This information may be provided directly by you or through public sources and third party references. Your connection to, experience with, and insight of any candidate is used to form an opinion and assess suitability of a potential candidate. If we share your feedback about a candidate with a third party, we will not attribute it to you.

2. WHAT INFORMATION DO WE COLLECT AND PROCESS?

We aim to find the best individuals to fill roles within our client's organisations. We research online databases, stream through other information sources and talk to a number of

individuals, including referees and sources to inform and shape our decision-making process.

The nature of executive search work requires that we process personal information confidentially and rapidly, often without referring to the data subject. Our data is processed in conformity with Data Protection Laws and legitimate interest where we are unable to speak directly to data subject.

We collect information from **candidates** when we receive a curriculum vitae (CV) or résumé. We may also collect personal information from third-party databases and other publicly available sources. We may request additional information such a professional qualifications, references and referees. We will always request explicit consent for any psychometric assessments or psychological tests, that may be required.

With our **Clients**, we collect information about the organisation, culture and role required. For our **Sources** and **Referees**, we collect information regarding the credentials of a source, details of relationship/knowledge of a candidate and opinions of that person. We may obtain this personal information directly from you or via publicly available information.

3. HOW DO WE USE AND PROCESS YOUR INFORMATION?

Your information will only be used in accordance with this Policy or where we have your permission. Please note that we are not responsible for how our clients and others process your data. Finally, under certain circumstances, we may be required by law to disclose information to others.



The information that you provide us with as a **candidate** would be used to identify suitable applicants for our clients who have requested us to conduct search activities on their behalf (our services). If you apply for a specific vacancy, we may pass your details to the client as part of the search process. In some cases, we may also identify relevant candidates for assignments that are initially confidential and pass your details to the client. If you are considered suitable, then we will discuss the opportunity with you in more detail prior to being connected to the client.

The information that you provide us with as a **client** would be used in relation to your request for our services. At times, we may also use your data from our platform for benchmarking, data analytics and statistics. We may also contact you in relation to services that we think may be of interest to you.

The information that you provide us with as a **referee** or **source** pertaining to your experience with and thoughts about would be used to gauge a potential candidate. If shared with a client, any such information would not be attributed to you. If a candidate provides us with your details as a referee, your contact information may be shared with our client.

Please ensure that any referee that has agreed to being a reference is aware of this Privacy Policy and you sharing their personal contact details with us. We would advise that you keep a written record of such an agreement.

4. HOW WE STORE AND SECURE INFORMATION WE COLLECT?

We are committed to protecting your personal data, from loss, misuse, unauthorised access, modification or disclosure. However, no system can be 100% secure, and so we cannot be held responsible for unauthorised or unintended access that is beyond our reasonable control.

We only retain personal information for so long as it is reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. After such time, we will delete or anonymise your information. We periodically review the basis and appropriateness of our data retention policy.

In some cases, we work with third parties who may process information on our behalf and provide services such as email distribution and IT services. These third parties are required to process such data securely and in accordance with our requirements.

We will take measures, where required by law, to ensure that any personal data handled in other countries will receive a similar level of protection as in your home country.

We might, at times, be required by law, to disclose information about you to law enforcement agencies or third parties. We take your interests into account, where possible but please do contact us if you are concerned about any such arrangements. You can explicitly request that your data is not processed.

5. WHAT ARE YOUR PRIVACY RIGHTS?

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right to access, correct, erase, update or access your personal information,



as well as have no further contact from The Red Pineapple.

You also have the right to restrict the processing of your personal information. If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

You have the right to lodge a complaint with the relevant data protection authority in your jurisdiction about how we collect and use your personal information. Please contact the local agency directly.

6. HOW CAN YOU REVIEW, UPDATE, DELETE, OR ACCESS THE DATA WE COLLECT FROM YOU?

Based on the laws of some countries, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please email or write to us at the address below.

Please note that we might request proof of identity. In some countries, if required or permitted by law, we may not be able to provide you with access to some of your personal data.

7. DO WE MAKE UPDATES TO THIS POLICY?

We may update this privacy policy from time to time. The updated version will be indicated

by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

8. HOW CAN YOU CONTACT US?

If you have questions or comments about this policy, you may email us at liv@theredpineapple.com or by post to:

LHC T18 Tideway Yard
125 Mortlake High Street
London SW14 8SN

Attn: Liv Gussing Burgess

Please contact us in the first instance if you have any questions or concerns. If you have unresolved concerns, you have the right to file a complaint with a data protection authority in the country where you live or work or where you feel your rights have been infringed. If you reside in the United Kingdom, you may file a complaint to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).