# **EMPLOYEE RECRUITMENT PRIVACY POLICY**

Heidrick & Struggles International, Inc., along with its subsidiaries and affiliates (details of which can be found here) collectively, "Heidrick", is a leading provider of global executive search and leadership consulting services. Heidrick is committed to protecting the privacy of anyone who applies to work with us. In this Privacy Policy, we describe how we collect, use, disclose and retain candidates' personal information.

### PERSONAL INFORMATION WE COLLECT

Heidrick collects your personal information in connection with the application and recruitment process in a variety of ways, including data contained in or gathered from applications, CVs or resumes, public social media sites, assessments, interviews and third parties (for example, recruitment agencies, referees and educational institutions). The information Heidrick collects from you and these sources includes:

- your name, contact information, demographic data, details in your CV or resume (including your educational background, work history, and other qualifications);
- employment objectives, compensation (where permissible), skills and certifications, memberships, and community involvement;
- results of any assessment, survey, or questionnaire you complete and information you provide during an interview;
- job performance, professional reputation, references and financial details to coordinate and reimburse for travel;
- details of any inabilities you may have which would impact your ability to do a certain role or parts of a role;
- details of your ability to work (including work permits, nationality and residency details)
- educational, criminal and financial background checks for certain roles where permissible by local law. These background checks may mean third party contacts you and obtains information.

You are under no obligation to provide personal information to Heidrick during the recruitment process. Whether you submit information to us through our website or through a third party, it is important that you do not share sensitive personal information that is unnecessary for your application. If, however, you fail to provide information as requested, we may not be able to process your application further or continue the recruitment process.

If you provide us with details about referees or previous employers for us to use, please make sure that you have obtained their consent to process their data and for us to contact them.

### HOW WE USE PERSONAL INFORMATION

Heidrick uses your personal information in the following ways:

manage the recruitment process and assess you for a position;

- communicate with you about the recruitment process;
- monitor and improve our recruiting and hiring processes;
- comply with legal or regulatory requirements; and
- in connection with regulatory inquiries, audits, legal claims, subpoenas, warrants, or other government/judicial processes or requests.

We also process information about you in a pseudonymous form for our research and analytics purposes.

### LEGAL BASIS FOR PROCESSING

We rely on our legitimate interests in processing your personal data when we evaluate you for potential employment, except for sensitive personal information whereby we rely upon your consent and we rely on our legitimate interests when conducting research and analytics. Our legitimate interests include: ensuring we are a responsible employer and conducting our business in the best way possible.

### SENSITIVE PERSONAL INFORMATION

Heidrick may process sensitive personal information (also called special category) such as information about your national or ethnic origin, sexual orientation, gender identification or religious beliefs. This could include processing your sensitive personal information to ensure meaningful equal opportunity monitoring and reporting, or, based on the disability status information you provide, we may assess whether appropriate accommodations are needed during the recruiting process. This may also include processing of information about your vaccination status (upon entry into a Heidrick office), in the territories where such processing such information is lawful, to comply with health and safety obligations.

## **DISCLOSURE OF PERSONAL INFORMATION**

We share your information internally and, as necessary, with our subsidiaries and affiliates worldwide. If you come to our attention through a third party, such as a recruitment agency, we may receive your information from that party. We also may disclose your information to third parties to whom we must disclose due to legal or regulatory requirements, such as pursuant to a court order or to government agencies in order to comply with our affirmative action obligations.

### SECURITY OF PERSONAL INFORMATION

Heidrick maintains what we consider to be reasonable technical and organizational measures to protect candidate personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction. To the extent that we disclose personal information to third parties, we require such parties also maintain reasonable security and confidentiality measures and use your personal information in accordance with our instructions and applicable law.

### **CROSS BORDER TRANSFERS**

Your personal information may be stored and/or processed in countries that do not provide the same level of protection as the data protection laws of your home country. We may also share your personal information with members of the Heidrick team in countries around the world who

are involved in the recruitment process or who are involved in decision-making. As a global business, this may involve personnel in a range of Heidrick subsidiaries and affiliates (see the link here for where we operate) in different countries around the world. This will include Heidrick personnel in those countries where your preferred employment opportunities are located and in addition, where we consider that an appropriate opportunity for you may exist outside those preferences, we may share your information with Heidrick colleagues in other countries. When we share data across borders we take what we consider to be appropriate steps to provide appropriate safeguards for personal information to be transferred, including, use of standard data protection clauses adopted or approved by the European Commission, binding and enforceable contractual commitments, and other similar measures. Where required by law, you can request a copy of those such safeguards by contacting us per below.

#### **RETENTION**

Heidrick will usually delete your personal information one year after the recruitment process ends. We may keep your information for a longer period if you are hired for the role, apply for additional positions with us, or if a dispute arises or is contemplated which requires retention of the information. However, we will retain your personal information for no longer than the period necessary to fulfill the purposes outlined in this Employee Recruitment Privacy Policy.

If your application for work with us is successful, personal information gathered during the recruitment process will be transferred to Human Resources and retained during your employment. Details regarding this processing will be provided to you in a new privacy notice.

### ACCESS TO PERSONAL INFORMATION - DATA SUBJECT RIGHTS

It is your responsibility to maintain your data to ensure its accuracy and validity. If anything changes with the data you have given us please tell us. At any time, you may correct, update or delete any of the personal information that you have provided to us by making a request to your Heidrick point of contact.

Where required by applicable law, you have the right to:

- access or obtain a copy of your personal information;
- correct the personal information we hold;
- require Heidrick to restrict, delete or stop processing your personal information;
- object to the processing of your personal information where Heidrick is relying on its legitimate interest as the legal grounds for its processing; and
- require Heidrick to provide you with your data, transfer your data, or have your data transferred from one controller to another. You also have the right to store your personal data for your use on a private device.

If you are based in Europe, we have appointed a Data Protection Officer who can be contacted at the email address below.

Please contact us at privacy@heidrick.com to exercise these such rights or if you have any questions about this Privacy Policy.

We reserve the right to make changes to this Policy from time to time. To print a copy of this statement from your web browser, simply right click your mouse and select "Print." You can then direct the document to be printed on the printer of your choice. Copies of this Policy can also be obtained from privacy@heidrick.com

As permitted by applicable law, you can contact your local data protection authority with any questions or to make a complaint about our handling of your personal information (although we would apprecaite the opportunity to handle any such questions or complaints before you send them to a data protection authority).