

Last Update: June 2024

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 applicants. 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, 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 regarding any accommodation requests you make throughout the recruitment process;
- details of your ability to work in certain locales (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. 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 references or previous employers, please ensure 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/or

- 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 collect and process your information where it is necessary in order to take steps prior to our potentially entering a contract of employment with you.

We may also seek your consent to process your personal information in specific circumstances or process it where necessary to comply with a legal obligation or for purposes connected to legal claims. If we use your information to improve our application or recruitment process, we do so on the basis that it is in our legitimate interests to ensure we recruit the best possible candidates.

SENSITIVE PERSONAL INFORMATION

Heidrick may process sensitive personal information such as demographic data if you provide us with that information and collection is permitted in your local jurisdiction. This data may be processed to ensure meaningful equal opportunity monitoring and reporting or to provide appropriate accommodations if needed during the recruiting process. We 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 Personal Information with our subsidiaries and affiliates worldwide in connection with your application and in accordance with the conditions of this Privacy Policy. A list of such offices and affiliates is [here](#).

We also disclose Personal Information to third party service providers, such as auditors, information technology providers or referees in order to effectuate the recruitment process. These organisations will have access to your Personal Information as necessary to perform their functions, but they may not use that data for any other purpose.

We reserve the right to disclose Personal Information where we believe such disclosure is required by law or is appropriate in connection with any legal claims (actual or proposed litigation), subpoenas, warrants or other government/regulatory/judicial processes or requests, as well as to protect visitors or the company (people and property) and other rights or interests, or to comply with applicable law.

SECURITY OF PERSONAL INFORMATION

Heidrick maintains what it considers to be reasonable and appropriate technical and organizational measures designed to protect Personal Information from accidental loss, misuse and unauthorized or unlawful access or processing, disclosure, alteration and destruction. To the extent that we disclose Personal Information to clients or third party service providers, we require that such third parties also maintain reasonable security and confidentiality measures and use the Personal Information in accordance with our instructions and applicable law.

We have security measures in place designed to protect our user database and access to this database is restricted internally.

CROSS BORDER TRANSFERS

Your Personal Information may be stored and/or processed in countries that do not provide the same level of protection for Personal Information as the data protection laws of your home country. We take appropriate steps, where required, to provide appropriate safeguards for Personal Information to be transferred, including, among others and as applicable, standard data protection clauses adopted or approved by the European Commission together with binding and enforceable commitments.

If you are located in the European Union, Heidrick participates in the EU-US Data Privacy Framework for Personal Data received in the United States (“**EU-US DPF**”) from the European Union and the European Economic Area, the UK Extension to the EU-US DPF (“**UK-US DPF**”), and the Swiss-US Data Privacy Framework (“**Swiss-US DPF**”). Heidrick adheres to the EU-US DPF as set out by the US Department of Commerce with respect to European Personal Information, including its Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability. If there is any conflict between the terms in this privacy policy and the Data Privacy Framework Principles, the Principles govern. You can find the list of participants in the DPF [here](#). Where required by law, you can request a copy of such safeguards by contacting us as detailed below. As a global company Personal Information may be accessible to those in other offices, a list of our office locations can be found [here](#).

Under certain data protection laws, you may have the right request a copy of such safeguards by contacting us as detailed below. As a global company, Personal Information may be accessible to those in other offices, a list of our office locations can be found [here](#). Your Personal Information may be accessed and processed by (i) our Global I.T. and Cybersecurity Team that is in United States of America and employed by Heidrick & Struggles International Inc., and (ii) our Global Data Protection Office that is in London (England) and employed by Heidrick & Struggles (UK) Limited, whose name and contact details are set out below. The purpose of the processing is to protect the safety of your Personal Information and to answer to any request made for the lawful exercise of your statutory rights as regard to your Personal Information as detailed below

As a DPF participant, Heidrick is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). Heidrick is obligated to arbitrate certain claims, provided that an individual has invoked binding arbitration as set forth in Annex I of Principles. As a DPF organization, Heidrick has responsibility for the processing of Personal Information it receives under the DPF and subsequently transfers to a third party acting as an agent on its behalf.

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.

DATA SUBJECT RIGHTS

Heidrick wishes to maintain Personal Information that is accurate, current, and complete. If Personal Information that you previously provided has changed, please submit your new information. In certain countries, you may have certain rights under data protection law. This may include the right to request, access, delete or update your information.

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; and
- object to the processing of your personal information where Heidrick is relying on its legitimate interest as the legal grounds for its processing.

If you are a resident of the State of California, you have the right to request information about how Heidrick collects, uses, and discloses your information. You have the right to access and correct your information, to request that Heidrick delete that information, and/or request that Heidrick limit the processing of your information. You will not be discriminated against for exercising these privacy rights.

You also have the right to lodge a complaint with a data protection authority in the EU or to the UK data protection regime (UK GDPR etc.), the Information Commissioner's Office in the UK. Please contact us using the details below and send the details of your request to enquire about or exercise such rights. Please note that we may need to retain certain personal information as required or permitted by applicable law.

CONTACT

If you have any questions about this Privacy Policy or how we handle your personal information, please contact our Data Protection Officer, Abigail Schuster (based in San Francisco, CA, USA) at privacy@heidrick.com or submit a request electronically by [clicking here](#). Alternatively, you may call our US & Canada toll-free number at 1-844-916-1329.

If you would prefer to contact us by postal mail, please use the following addresses below, the address listed for your local office which can be found [here](#), or contact us for a local address:

Attn: LEGAL Department
Heidrick & Struggles
233 S. Wacker Drive
Suite 4900
Chicago, IL 60606

Attn: LEGAL - Data Protection Officer
Heidrick & Struggles (UK) Limited
40 Argyll Street
London, GB W1F 7EB
United Kingdom

Attn: LEGAL Department
Heidrick & Struggles (Shanghai) Talent Consulting Co., Ltd.
Suites 3701-02, 3712-13, 37/F, Tower 2, Plaza 66
1366 Nanjing Road West
Shanghai, 200040, People's Republic of China

Heidrick & Struggles (Shanghai) Talent Consulting Co., Ltd. – Beijing Branch
Suite 718, South Tower, Kerry Center
1 Guanghua Road, Chaoyang District
Beijing, 100020, People's Republic of China

Due to the nature of our processing operations we have also nominated the following representative within the European Economic Area:

Attn: LEGAL - Data Protection Representative
Heidrick & Struggles Belgium
Blue Tower, Avenue Louise 326
15th floor, Brussels 1050
Belgium