

Privacy Notice

1. Introduction

- 1.1 Executives Place Ltd. trading as Ezekia (**we** or **us**) is committed to protecting your personal information and respecting your privacy.
- 1.2 This Privacy Notice, together with any other documents referred to in it, sets out the basis on which any personal data that we collect from or about you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we treat it.
- 1.3 For the purpose of the Data Protection Act 2018 and the General Data Protection Regulation, the data controller is Executives Place Limited (trading as Ezekia), a company registered in England (company number 7100165) of Churchill House, 137-139 Brent Street, London NW4 4DJ United Kingdom.
- 1.4 We may update this Privacy Notice from time to time. Any changes we make in the future will be posted on our website at www.ezekia.com (the **Website**). Please check back regularly to see any updates or changes to this Notice.

2. Data Protection Officer

- 2.1 The contact details for our Data Protection Officer are as follows:

Data Protection Officer

Email: dpo@ezekia.com

Telephone: 01428 788345

Post: Executives Place Ltd, Churchill House, 137-139 Brent Street, London NW4 4DJ

- 2.2 It is the responsibility of the Data Protection Officer to keep our organisation and our staff informed and advised about their obligations to comply with data protection laws, to monitor compliance with those laws, to advise on data protection impact assessments, to train staff and conduct internal audits, and to be the first point of contact for supervisory authorities and for individuals whose personal data we are processing.

3. Browser Information & Cookies

- 3.1 When someone visits the Website, we place small text files known as “cookies” on their computer. These are widely used in order to make websites work (or work more efficiently), as well as to provide information to the owners of the website, and in some cases to collect personal information about the individual website visitor.
- 3.2 We also use a third party service, Google Analytics, to collect certain internet log information and details of visitor behaviour patterns. You can read more about how we use cookies in our Cookies Policy.

4. Security

- 4.1 We maintain a variety of physical, electronic and procedural safeguards to protect your personal information—we use commercially reasonable tools and techniques to protect against unauthorized access to our systems.
- 4.2 We may have links to outside web sites that we do not control; we are not responsible for the content or privacy policies of these sites (users should check those policies).

5. Data Collected

- 5.1 The information that we collect from you and the legal basis for such collection and subsequent processing is detailed below:
 - 5.1.1. **Business contact information:** We collect business contact information, and billing information, from our clients and our potential clients for a legitimate interest of managing our relationship and contract with the client. We use this information in order to provide products, services, or information about our products and services.
 - 5.1.2 **Client Data:** Clients can use the platform to organise information that relates to candidates or prospective candidates or business development activities. Information that is uploaded by our clients, or is collected by our clients, is used only by us to provide service to our clients. We are a processor of such data, and our clients are the controllers. Our clients control how that information is collected, used, shared, and processed.
 - 5.1.3 **Website data and Cookies:** online identifiers are collected based on our legitimate interest in marketing and optimizing our website; cookies are placed and used based on your consent, which is managed by a tool on our website, and more details are available in our cookie policy.
 - 5.1.4 **Other Information:** necessary to perform the services outlined in our contract with you.

6. How we use your personal data

6.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

6.1.1 Where you have given your consent to the processing of your personal data for a particular purpose.

6.1.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. In particular, this includes our legitimate interest in marketing our services to clients, potential clients, website visitors, and others.

6.1.3 Where it is necessary for the performance of a contract with you.

6.1.4 Where we need to comply with a legal or regulatory obligation.

7. Marketing

7.1 You will receive marketing communications from us if you have requested such communication, or if you are an existing client we may communicate with you about related goods and services.

7.2 You can opt-out of marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at support@ezekia.com at any time.

8. Sharing Information

8.1 We transfer information to third parties, including:

8.1.1 **Service Providers.** We may provide personal data to third parties that act as agents, consultants or contractors to perform tasks on behalf of and under our instructions. Such recipients must agree to abide by confidentiality obligations, and are not permitted to use your personal data except for the limited purpose that we request.

8.1.2 **Third Party Tracking Companies.** We may share your information with our advertising and analytics partners. These third parties may also collect information directly from you as described in this Privacy Policy over time and across different websites. The privacy policy of these third party companies applies to their collection, use and disclosure of your information.

8.1.3 **Other third parties that we employ** in order to provide the services outlined in our contract with you.

8.1.4 Where we need to comply with a legal or regulatory obligation. Or where our company is acquired.

8.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

8.3 We are based in the UK, we store data in the UK and EU, and when you transfer data to us you are transferring it to the UK and EU. The UK is currently recognized as adequate for data protection purposes by the EU, but if in future that adequacy finding is discontinued, we will receive personal data, and conduct onward transfers, based on standard contractual clauses or another lawful mechanism in accordance with GDPR Chapter V and UK DPA 2018.

8.4 Ezekia transfers data to subprocessors in the EU based on its adequacy in UK law, and to the USA based on the Data Privacy Framework certification of the subprocessors. In the event of a discontinuation of such DPF certification, the transfer will be based on Standard Contractual Clauses.

9 Retention of Your Information

9.1 We will retain your personal data for as long as you continue to be our client so we can provide you with our products and services. We will also retain your personal data as necessary to fulfil our contractual obligations and to comply with our legal obligations, resolve disputes, and enforce our agreements.

9.2 We will retain personal data that is part of our marketing database for a period for which we think that information is relevant. We actively manage our marketing database so that only relevant personal data is retained. This is typically 3 years from the last contact with you.

9.3 Where we no longer need to process your personal data for the purposes set out above, we will delete your personal data from our systems.

9.4 Where permissible, we will also delete your personal data on your request. Information on how to make a deletion request can be found in the Your rights section of this Privacy Notice.

10 Your rights as a data subject

10.1 This section sets out the rights that you have as a data subject, by reason of the General Data Protection Regulation.

10.2 You have the following rights:

10.2.1 The right to request access to the personal data that we hold about you;

10.2.2 The right to request rectification of the personal data that we hold about you;

10.2.3 The right to request erasure of the personal data that we hold about you;

10.2.4 The right to request restriction of processing about you;

10.2.5 The right to object to processing; and

10.2.6 The right to data portability.

If you wish to invoke any of the above rights, please notify our Data Protection Officer using the contact details set out in Section 2 above. Please include the words DATA PRIVACY REQUEST in the subject line of your email, or at the top of your letter.

- 10.3 Where our processing of personal data is based on your having given consent, you have the right as a data subject to withdraw that consent at any time. If you wish to invoke this right, please notify our Data Protection Officer using the contact details set out in Section 2 above. Please include the words DATA PRIVACY REQUEST in the subject line of your email, or at the top of your letter.
- 10.4 You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Information Commissioner's Office, full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

11 **Contact details**

- 11.1 You can contact our Data Protection Officer if you have any other questions or concerns about personal data and privacy matters, using the contact details set out in Section 2 above.
- 11.2 Please include the words DATA PRIVACY REQUEST in the subject line of your email, or at the top of your letter.