

# Privacy and cookie policy

GWS Advisory Sarl (whose registered office is at 31, Boulevard G.D. Charlotte, L- 1331, Luxembourg)("GWS Advisory", "we, us, our") is a consultancy firm.

Greenlime Consulting is a brand of GWS Advisory.

GWS Advisory acts as the data controller of personal information obtained about:

- personnel of clients with a need for consultancy and recruitment services;
- candidates who are interested in applying for positions published on our website or on different job boards we are using; and
- other users of our website.

GWS Advisory has a Data Protection Officer ("DPO"), who can be contacted on [management@gwsadvisory.com](mailto:management@gwsadvisory.com) or in writing at GWS Advisory, 31, Boulevard G.D. Charlotte, L- 1331, Luxembourg.

If you have any concerns or questions regarding the processing of your personal information please contact the DPO.

This Privacy Policy sets out how we use personal information about these individuals ("**you, your**"). It explains:

- [What personal data is collected and processed?](#);
- [How will your personal data be used?](#);
- [Who will have access to your personal data?](#);
- [Transferring your personal information;](#)
- [Hyperlinks;](#)
- [Data quality;](#)
- [Data retention;](#)
- [Security measures;](#)
- [Your rights;](#)
- [Contact details;](#) and
- [Changes to this Policy.](#)

## What personal data is collected and processed?

Our main aim is to provide advisory and recruitment services.

In order to do so, we collect the personal information mentioned in this section.

For our users, which may include clients with a need for consultancy and recruitment services and candidates who are interested in job postings, the personal data (which means any information about a living individual whose identity is apparent or can be reasonably ascertained from such information, including when in combination with our sources of information) we may collect the following:

- Identity information - name, address, gender, personal contact details, (and if provided by you: photographs, images and video)
- Employment details - information you supply to us on your CV, job title, description of job role, work contact details, details of technical skills and work history, i.e. previous roles;
- Background information - professional membership details and interests and preferences in a professional/personal sense, which may be deduced from information provided by you.

We also collect information about how you browse our website using cookies and similar technologies. See our Cookie Policy for further information about how this works.

## How will your personal data be used?

To be able to provide our products and services to you, your personal information may be retained, processed and disclosed by us for the following purposes:

<b>Service Provision and Internal Processing</b>	<b>Basis for Lawful Processing</b>
To provide a service to you (e.g. to facilitate the recruitment process, by matching candidates' details to job opportunities), and to provide information on such services, including notifying you about changes to such services.	<i>Necessary for us to carry out our contract with you</i>
To allow details of candidates' skills and experience to be viewed by our clients whom we feel may be interested in engaging their services.	<i>Necessary for us to carry out our contract with you</i>

<p>To carry out our obligations arising from any contracts entered between you and us.</p>	<p><i>Necessary for us to carry out our contract with you.</i></p>
<p>To confirm, update and improve our client and/or candidates records in order to maintain an accurate database.</p>	<p><i>GWS Advisory' Legitimate Interests.</i></p>
<p>To respond to any queries or complaints that you raise.</p>	<p><i>Necessary for us to carry out our contract with you and GWS Advisory' Legitimate Interests.</i></p>
<p><b>Management of Relationship</b></p>	<p><b>Basis for Lawful Processing</b></p>
<p>To manage, analyze, understand and develop your relationship with us.</p>	<p><i>Necessary to perform a contract and GWS Advisory' Legitimate Interests.</i></p>
<p>To keep you informed of any of our other/new services in connection with our existing relationship.</p>	<p><i>GWS Advisory' Legitimate Interests.</i></p>
<p>Where you have subscribed to receive job matches, your skills and interview request notifications. You will be able to unsubscribe from such notifications at any time.</p>	<p><i>Necessary to perform a contract.</i></p>

<p><b>Direct Marketing</b></p>	<p><b>Basis for Lawful Processing</b></p>
<p>To keep you informed of any of our other services and identify services that may be of interest to you, where these fall outside of our existing relationship and you have chosen to be made aware of this (see further section on <b>Marketing</b> below). This could include information about recently registered candidates / consultants, client workshops we are arranging, market updates that may be of interest.</p>	<p><i>GWS Advisory' Legitimate Interests and your Consent.</i></p>
<p><b>Analytics and Statistics</b></p>	<p><b>Basis for Lawful Processing</b></p>
<p>To review the services we provide or have provided to you and carry out analytics and report on engagement.</p>	<p><i>GWS Advisory' Legitimate Interests</i></p>
<p><b>Legal Obligations</b></p>	<p><b>Basis for Lawful Processing</b></p>
<p>If we must disclose information by reason of any law, regulation or court order.</p>	<p><i>Necessary for Compliance with a Legal Obligation.</i></p>
<p>Taking steps to enforce or defend any legal claims made by, against or otherwise involving you. This includes any associated investigation or discovery exercise.</p>	<p><i>Necessary for Compliance with a Legal Obligation and GWS</i></p>

	<i>Advisory' Legitimate Interests.</i>
<b>Other</b>	<b>Basis for Lawful Processing</b>
<p>For any other purpose which will be communicated to you.</p> <p>Please note that we may carry out new processing activities. If the purpose of such new activities is not incompatible with the above, we may use your personal data for such purpose, but we shall inform you prior to further processing.</p>	<i>GWS Advisory' Legitimate Interests</i>

The 'legitimate interests' referred to above are:

- the processing purposes described in the table above to the extent the processing is necessary in order to: (i) enter into contracts with you and meet our obligations under such contracts; or (ii) comply with our legal obligations under the laws of the European Union and its Member States;
- meeting and complying with our accountability requirements and legal obligations globally; and
- exercising our fundamental rights and freedoms, including our freedom to conduct a business and right to property.

We may also process your personal data if this is necessary for the establishment, exercise, or defense of legal claims.

GWS Advisory does not use your personal information to make solely automated decisions which affect you legally or similarly.

## **Marketing**

From time to time, where we have obtained your prior consent, we may send you information that we perceive may be of interest to you. You may receive this information by email. If, at any time, you prefer not to receive further communications from us in any form (except in connection with information or services that you specifically request), you will have the ability to unsubscribe from such communications by means of a link provided in every e-mail or SMS that is sent to you by us or by contacting us [contact@gwsadvisory.com](mailto:contact@gwsadvisory.com).

## **Who will have access to your personal data?**

We may share personal information with clients who we think may be interested in engaging your services, whether as an employee or otherwise. We shall do this in the course of providing our services to you and with your prior consent.

In addition, from time to time, we may need to share personal data with third parties in order to provide high quality of service by you, to you. These may include:

- *our subsidiary* for the purpose of managing and administering our business and to provide you with information which might be of interest to you;
- *our advisors, which includes our accountants, auditors, lawyers, other professional advisors and business contacts* - for the purpose of assisting us to better manage, support or develop our business and comply with our legal and regulatory obligations.
- *third party service providers* - who need to know the information in order to provide us or you with services (including our third-party service providers who process information on our behalf to help run some of our internal business operations, including email distribution, data storage, information technology and marketing services, customer services and data analytics); and
- *law enforcement and regulatory bodies* - in order to comply with any legal obligation or court order.

## **Hyperlinks**

Our website may contain links to other websites, which are not controlled or managed by us and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you, which will be used by them in accordance with their privacy policy, which may differ from ours.

## Data quality

We rely on you to ensure that your personal information is complete, accurate and current. Please do inform us by any means promptly of any changes to or inaccuracies to your personal information.

## Data retention

We hold your data in order to provide you with future recruitment services or other services you may request and to manage our business relationship with you.

We retain personal data for various time periods which comply with legal and regulatory obligations, to enable compliance with any requests made by regulators or other relevant authorities and agencies, to enable us to establish, exercise and defend legal rights and claims, and for other legitimate business reasons.

We retain your personal data for the period of time required for the purposes for which it was collected, any compatible purposes which we subsequently establish, any new purposes to which you subsequently consent, or to comply with legal, regulatory and policy requirements.

## Security

We have appropriate technical and organizational security measures in place to ensure the security of your information and to protect it against deliberate or accidental manipulation, destruction, loss or unauthorized access.

Despite our efforts regarding security, it is important to bear in mind that the internet is not a secure means of communication. Personal information communicated through the internet may be intercepted by other people. We cannot guarantee the security of personal information sent to us through this website. By using this website and entering your personal data, you accept that you use this website at your own risk.

If you choose, or you are provided with, a user identification code, password, or any other piece of information as part of our security procedures for one of the registration-only sections of the website, you are responsible for maintaining the confidentiality of your password and username for the website and you are responsible for all activities that are carried out under them. We do not have the means to check the identity of people using the website and we will not be liable where your password or username is used by someone else.

## Your rights

*Right to access, correct and delete your personal information.*

GWS Advisory aims to ensure that all personal information is correct.

You also have a responsibility to ensure that any change in your personal data (for example, change of address and bank accounts) are notified to us so that we can ensure that your data is up to date.

You have the right to request access to any of your personal information that the Company may hold, and to request correction of any inaccurate data relating to you. You furthermore have the right to request deletion of any irrelevant data we hold about you.

### *Additional rights*

You also have the following additional rights:

- *Data portability* - where we are relying upon your consent or the fact that the processing is necessary for the performance of a contract to which you are party as the legal basis for processing, and that personal information is processed by automatic means, you have the right to receive all such personal information which you have provided to GWS Advisory in a structured, commonly used and machine-readable format, and also to require us to transmit it to another controller where this is technically feasible.
- *Right to restriction of processing* - you have the right to restrict our processing of your personal information where:
  - you contest the accuracy of the personal information until we have taken sufficient steps to correct or verify its accuracy.
  - where the processing is unlawful, but you do not want us to erase the data;
  - where we no longer need the personal information for the purposes of the processing, but you require it for the establishment, exercise or defense of legal claims; or
  - where you have objected to processing justified on legitimate interest grounds (see below) pending verification as to whether GWS Advisory has compelling legitimate grounds to continue processing.

Where personal information is subject to restriction, we will only process it with your consent or for the establishment, exercise or defense of legal claims.

- *Right to withdraw consent* - where you have provided us with your consent to process data, you have the right to withdraw such consent at any time. You can do this by: (i) in some cases deleting the relevant data from the relevant HR system (although note that in



this case it may remain in back-ups and linked systems until it is deleted in accordance with our data retention policy); or (ii) contacting your local Human Resources contact.

- *Right to object to processing justified on legitimate interest grounds* - where we are relying upon legitimate interests to process data, you have the right to object to that processing. If you object, we must stop that processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms or where we need to process the data for the establishment, exercise or defense of legal claims. Where we rely upon legitimate interests as a basis for processing, we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

You also have the right to lodge a complaint with a supervisory authority, in your country of residence, if you consider that the processing of your personal information infringes applicable law.

## Contact details

If you wish to exercise your rights or have any queries or requests about how we process your personal information, you can contact us at [contact@gwsadvisory.com](mailto:contact@gwsadvisory.com).

If you are unhappy about how we use your personal information, we hope that in the first instance you will let us know.

However, you can also contact our Data Protection Officer at [management@gwsadvisory.com](mailto:management@gwsadvisory.com).

You also have the right to lodge a complaint with your data protection regulator.

## Changes to this Policy

Any changes we make to our Privacy Policy in future will be posted on this page. We encourage you to check the date of this Policy whenever you visit our website for any updates or changes.

This Policy was last updated on 28 October 2019.

# Cookie Policy

This policy ("Cookie Policy") is issued by GWS Advisory (referred to as "GWS Advisory", "we", "us" or "our" in this Cookie Policy). This policy applies to our use of "cookies" in connection with the advisory and recruitment services ("Application"); if you do not agree to the terms, please see section 4 of this Cookie Policy to control your cookie settings or please do not use the Application,

## **What this policy covers**

This Cookie Policy sets out:

- what a cookie is (paragraph 2);
- an overview of the cookies we use (paragraph 3);
- what you can do if you do not agree to the cookie use (paragraph 4);
- further information about cookies in general (paragraph 5); and
- a detailed table listing all of the cookies that we use (paragraph 6).

If you don't want to accept cookies in connection with your use of the Application, you should stop using it or turn off your cookies (see paragraph 4 below for how to do this) but this may impact how it functions.

## **What are cookies?**

Cookies are small text files containing small amounts of information which are created and stored on any of your devices that enable internet usage e.g. your computer, smartphone or tablet. This Cookie Policy provides you with information about the cookies we use in the Application and why.

## **Cookies used on the application**

We use several different types of cookies. We use:

Necessary cookies which allow certain fundamental features of the Application to work;

Functionality cookies, which allow us to remember choices you make and preferences you set (e.g., your cookie preference);

Targeting cookies, which record the fact that you have accessed the Application and then which links you have followed whilst you use the Application.

Performance cookies, which monitors usage of the Application. We also use third party cookies; these are cookies that are set by a third-party website rather than by us.

Some of these are session cookies which are temporary and allow us to link your actions during a single use of the Application. These are deleted at the end of your browsing session. Others are persistent cookies which remain on your device for the period specified in the cookie. These cookies help us to identify you as a unique user (by storing a randomly generated number).

The following is a more detailed explanation of the types of cookies we use:

a. necessary cookies

Necessary cookies are essential and help you navigate the Application. Without these cookies, services you have asked for, like the matching compatibility, cannot be provided. These help to support security and basic functionality and are necessary for the proper operation of the Application, so if you block these cookies we can't guarantee your use or the security during your visit.

b. functionality cookies

Functionality cookies are used to provide you the best user experience. These cookies are, for instance, used to remember your personal preferences for matching capabilities. It also allows the Application to remember choices made (like turning off use of cookies) to provide more personal features.

c. targeting cookies

Targeting cookies record the fact that you have used the Application and what other web pages you have visited in between to help build up an idea of your preferences and interests. We may use this information to deliver online content and marketing tailored to your interests and online experiences. Please note that any direct communications will be conducted in line with our privacy policy and any preferences you have provided in relation to the receipt of direct marketing communications.

d. performance cookies

Performance cookies help us to understand the behavior of users of the Application. This allows us to continuously improve the Application to provide the best recruitment experience.

These cookies are also used to help us understand how effective our Application is; for instance, these cookies tell us which pages visitors go to most often and if they get error messages from web pages. All the information that these cookies collect is aggregated, to assist us to improve how the Application works. Some of these cookies are managed by third parties, and you may refer to the third parties' own website privacy notifications for further information.

We use Google Analytics cookies to obtain an overall view of user habits and volumes, and to help improve the overall experience on the Application.

Google Analytics is a third-party web analysis service provided by Google Inc, which uses performance cookies and targeting cookies. The information generated by these cookies about your use of the Application (including your IP address) will be transmitted to and stored by Google Inc on servers in the United States. Google will use the information collected for the purpose of evaluating your use of our Application on our behalf, compiling reports on website activity and providing other services relating to activity and internet usage to us. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser as described above. Furthermore, you can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en-GB>. This creates an opt-out cookie which prevents the further processing of your data. For more information about Google Analytics cookies, please see Google's help pages and privacy policy.

Accepting these cookies is a condition of using the Application, so if you prevent them, we cannot guarantee how the Application will perform for you.

## Control your cookie settings.

Once you have given us your agreement to the use of cookies, we shall store a cookie on your computer or device to remember this for next time. If you wish to withdraw your agreement at any time, you will need to delete our cookies using your internet browser settings. You should do this through the browser settings for each browser you use. Please be aware that some of our services will not function if your browser does not accept cookies. However, you can allow cookies from specific websites by making them "trusted websites" in your internet browser. The following links may assist you in managing your cookies settings, or you can use the 'Help' option in your internet browser for more details:

- Internet Explorer: <http://windows.microsoft.com/en-us/cookies/en>
- Mozilla Firefox: <http://support.mozilla.com/en-US/kb/Cookies>
- Google Chrome: <http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647>
- Safari: [https://support.apple.com/kb/ph19214?locale=en\\_GB](https://support.apple.com/kb/ph19214?locale=en_GB)
- Adobe (flash cookies): <https://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html>

If you share the use of a computer, accepting or rejecting the use of cookies may affect all users of that computer.

## Managing your cookies

The following link contain further information about cookies: <http://www.aboutcookies.org/>.

In addition, a guide to online privacy has been produced by the internet advertising industry which can be found here:

- <http://www.youronlinechoices.eu>
- [www.aboutads.info](http://www.aboutads.info)

## Changes to this Cookie Policy

Any changes we make to our Cookie Policy in future will be posted on this page. We encourage you to check the date of this Policy whenever you visit our website for any updates or changes.

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