

## Privacy & data protection policy in accordance with the EU General Data Protection Regulation (GDPR) and Australian Privacy Act (APA)

### Introduction and application

Maritana Partners gathers and processes data on individuals and companies for the purposes of executive search and related consultancy services.

Maritana Partners takes the privacy rights of individuals, whether members of staff, candidates or clients very seriously. This policy describes how personal data is collected, handled and stored in order to meet Maritana Partners data protection standards and to comply with international data protection regulations (GDPR and APA). This policy protects the rights of clients, candidates, and all staff of Maritana Partners.

### Policy scope

This policy applies to all employees of Maritana Partners. All Maritana Partners employees are data processors. This policy applies to all data that the company holds relating to identifiable individuals.

### Definitions

Identifiable Individual means any individual whose data Maritana Partners holds which, as a consequence of the data itself, could potentially identify that specific individual. This is inclusive of any information that could be used to distinguish one person from another and be used for de-anonymising anonymous data.

Data processor: an employee of Maritana Partners who is responsible for processing personal data on behalf of the company. Third party IT providers contracted by Maritana Partners are also data processors for the purposes of the legitimate services they provide to Maritana Partners. Third party providers to Maritana Partners are bound by the provisions of this policy and confirm their compliance with it.

Data controller: is an employee of Maritana Partners who determines the purposes and means of processing personal data. A Partner and Consultant of Maritana Partners is a data controller.

Maritana Partners employee refers to any full or part time member of Maritana Partners, whether on a permanent or temporary contract.

Client: means any of our clients and their employees who are looking to recruit or assess executives and to whom Maritana Partners provide Services.

Candidate: means any candidate, applicant, prospect, or Client employee who is considered, evaluated, or assessed by Maritana Partners in connection with the Services.

### Legal basis for processing personal data

Personal data will only be collected and processed by Maritana Partners for the legitimate purposes of:

- Executive or Non-Executive advisory work including search.
- The provision of related consultancy services.
- Maritana Partners staff and company administration.

Wherever possible, Maritana Partners attempts to secure consent from an individual to store and process their data. Consent is sought when an individual contacts or is contacted by staff at Maritana Partners pursuant to job opportunities. Individuals covered by EU GDPR regulation are emailed a consent form that seeks explicit approval to retain information on them (e.g.: a copy of their Curriculum Vitae - CV) on its database so that staff from Maritana Partners can contact them about relevant searches in the future.

Consent is implied and assumed when an individual actively responds to and / or engages in a search process pursuant to a job opportunity. The fact that their personal data and interest in the appointment is going to be shared with a client is implied and assumed.

## Categories of personal data

Personal data for the purposes of Maritana Partners legitimate business interests includes, but is not necessarily limited to:

- Name
- Address/location
- Date of birth
- Gender
- Languages
- Education
- Work history
- Compensation
- Performance and suitability assessments
- Telephone, email, social media and Skype contact details
- Formal and informal references
- Profile picture sourced online, or directly

The information Maritana Partners collect may also include, and not limited to:

- Personal identification information
- Lifestyle preferences, capabilities and personality profile such as community involvement, individual preferences, intellectual capacity, personality, behaviour, character traits, competencies, referee data and social preferences.
- Health, identity, diversity and criminal conviction information where appropriate and in accordance with local law including diversity information (racial or ethnic origin, religious or other similar beliefs), physical / mental health, and any criminal convictions.
- Other information such as prior military service, performance history, details of any dependents, immigration status and any other relevant information you have shared with us.

## Categories of individuals

Personal data is collected by Maritana Partners about:

- Potential and actual candidates
- Potential and actual clients
- Referees, both named and informal
- Potential and actual mentors
- Employees

## Sources of data

The personal data processed by Maritana Partners is sourced via one or more of the following methods:

- Direct telephone, email, online, and in-person contact with the individual in question
- Third party individuals, such as referees
- Public company records, websites and press releases
- LinkedIn
- Subscription databases and data-sources

## Categories of recipients of personal data

Personal data collected for business development, mentoring, and executive search purposes will only be shared on a need-to-know basis with:

- Actual candidates
- Potential and actual clients
- Potential and actual mentors
- Individuals employed by Maritana Partners

For individuals in the EU, the transfer of personal data outside the EU will only be carried out with the consent of the individual.

## Length of time data is retained for

For the legitimate business interests of Maritana Partners and its data controllers, personal data about clients and candidates is stored securely and indefinitely, unless a candidate requests otherwise.

Retaining contact with clients and candidates (prospective or actual) and understanding the course of an individual's career and their respective experiences and personal progression is a critical factor in Maritana Partners ability to carry out its legitimate business interests.

Each time personal data is processed by a Maritana Partners employee, that employee will if necessary take all reasonable measures to ensure the data is up to date. Measures may include contacting the individual about whom the data is being processed, accessing databases to which Maritana Partners subscribes, and using publicly available information.

## Data storage and access

Maritana Partners stores personal data as follows:

- The use of a licensed external database service to which only Maritana Partners employees have access, and to which access is password protected
- Hand written records are either securely shredded (via an outsourced provider) or are stored securely in locked offices at Maritana Partners or other locations managed by Maritana Partners
- Additional data is stored (documents, emails, and contacts) via Maritana Partners IT system, which includes a licensed cloud-based system which is password protected with two step authentication.

Maritana Partners employees will have access to stored personal data about candidates and clients (actual or potential). Employees access this data via Maritana Partners Computers and mobile devices. These devices incorporate appropriate secure access.

Maritana Partners employees must follow detailed guidelines regarding the entry and processing of data onto and through the database. Individual personal data may be accessible by the database provider for the purpose of software maintenance.

Maritana Partners outsources its IT management and data security provision, which carries out annual assessments of system and data security in-line with GDPR/APA regulations. Spanning backup is used daily to back up all cloud data. Individual personal data may be accessible by the provider for the purpose of its IT service provision.

Other third-party providers may have limited access to personal data held and processed by Maritana Partners for specific and limited purposes, such as for employee payroll.

## Rights of access and objection

Individuals about whom Maritana Partners processes data are entitled to:

- Confirmation that their data is being processed
- Access to their personal data
- A copy of Maritana Partners privacy and data protection policy

Individuals who request access to their personal data in writing will be provided with their data within one calendar month of their request.

An individual who has reviewed the personal data held on them by Maritana Partners has the right to have their personal data rectified within one calendar month if it is inaccurate or incomplete, in which instance Maritana Partners will inform any third party who has received the data in question of the rectification where possible.

An individual has the right to object to the processing of their personal data at any point by emailing: [contact@maritana-partners.com](mailto:contact@maritana-partners.com). In that instance, Maritana Partners will continue to store their data but will not process it for any purpose.

An individual has the right to object to the storage of their personal data at any point by emailing: [contact@maritana-partners.com](mailto:contact@maritana-partners.com). In that instance, Maritana Partners will destroy/delete the data stored on the individual unless it is required to retain this information for a period of time, such as in the case of a placed candidate or for regulatory purposes.

## Data breaches

In the event of a data breach about which Maritana Partners becomes aware, it will report the details of the breach to the Office of the Australian Information Commissioner (OAIC) within 72 hours, where feasible or as soon thereafter as possible.

The OAIC details are  
Office of the Australian Information Commissioner (OAIC)  
Level 3/175 Pitt St,  
Sydney NSW 2000  
P. 1300 363 992

## How to make a complaint

Individuals can write to Maritana Partners data protection officer with details of their complaint: [contact@maritana-partners.com](mailto:contact@maritana-partners.com). A written response will be provided after an internal investigation and within one calendar month.