

## ***Privacy Policy***

In order to demonstrate and communicate our commitment to conducting executive searches with the highest level of confidentiality, honesty, and ethics, Spelman Johnson has developed this Privacy Policy, which explains how Spelman Johnson collects, uses, and discloses individually identifiable information (“*personal information*”) that we obtain through our website. Please read this information carefully. By using this website, and/or submitting any personal information, you expressly consent to the terms in this Privacy Policy, as well as our Legal Notice.

Our firm, Spelman Johnson, has appointed a Data Protection Officer, Margaret Holes, Database Administrator and may be reached at 413-529-2895 or at [mlh@spelmanjohnson.com](mailto:mlh@spelmanjohnson.com).

### **Collection of Personal Information**

We consider your data to be private and confidential, and we hold ourselves to the highest standards of trust in its safekeeping and use. Our website employs a variety of mechanisms to ensure that data you provide is not lost, misused, or altered inappropriately (e.g., storing all data in a secure location, requiring authentication for access, etc.). Any data requested will be used for recruitment purposes only. We have a legitimate interest in this data in order to ensure that meaningful and relevant employment opportunities are presented to you in a timely manner.

Personal information will typically be acquired directly from you via voluntary submission of documents relevant to the search process, e.g., resume or curriculum vitae (including name, address, telephone number, email address, degrees and qualifications, employment history, and other details). It may also include interview notes and comments resulting from reference checks. Additional information may occasionally include biographical data readily available in the public domain.

Apart from verification of employment history, education, and other qualifications, together with subsequent reference testing, Spelman Johnson will assume that the information provided by you is accurate, complete, and up-to-date at the time of submission.

We collect various categories of personal information on this website. If you submit an inquiry or question via an online form or email, we may collect your name, email address, or other personal information contained in that correspondence. If you are a potential candidate, we may collect your name and contact details, information about your employment objectives, past and current employment and professional experience, educational background, language skills, and other data that you provide online through a form, resume or curriculum vitae. If you are a client or potential client, we may collect your name, contact details, title or position for which you are conducting a search, products or services requested, or other information that you provide via online forms or email correspondence. With respect to all website visitors, we do not wish to collect any “sensitive” personal information, such as age, religion, racial or ethnic origin, sexual orientation, government identity numbers such as Social Security or other numbers, health or medical conditions, or criminal history, unless we are legally required to do so for recruiting purposes. We obtain data about our candidates in a lawful manner and from public sources only.

### **Use of Personal Information**

We may use personal information to respond to your inquiries and answer your questions, to provide you with requested information, and to undertake activities in connection with our executive search or other services, such as evaluating candidate qualifications, contacting potential candidates for further personal information, contacting named references, and communicating with clients about potential candidates.

The information we collect will be used primarily to support your application for a defined, open position. The information assembled will be confined to information provided by you and your third-party references. Disclosure of the assembled information of a particular individual will be made solely to the specific, named client organization we represent, and unless specifically approved by you, will not be transferred to any other third party.

We also may use personal information for the purposes of testing and maintaining our company databases, networks, and computer systems, and for training and other internal purposes.

### **Disclosure of Personal Information**

We may share personal information with our offices and affiliates where necessary or appropriate in connection with the performance of our executive search or other services. We reserve the right to disclose personal information to third-party subcontractors, including information technology providers and business process outsourcing providers, in order to help support our business operations. We also reserve the right to disclose personal information in connection with the sale, assignment, or other transfer of all or part of the business, or where we believe such disclosure may be required by law or may be appropriate in connection with any legal claims. We may also use, disclose, or otherwise process any information for statistical or any other purposes that we choose in our sole discretion, as long as such information is not in personally identifiable form.

### **Website Usage Data**

Like many websites, we passively collect data about website usage through various means. We use Internet protocol (IP) addresses to identify server problems, administer the website, and compile aggregated statistics for marketing and research purposes. We use navigational data, including log files and click-stream data, to identify information about your Web browser and operating system, and the time period in which you visit the website or a portion of the website. This information is used to administer the website, improve site content, and compile aggregated statistics for research purposes. We also use small text files called “cookies” that are sent to the hard drive of your computer to store bits of information related to your use of the website. You may configure your Internet browser to reject cookies. However, if you do so, you may not be able to access important functions or enjoy certain conveniences at this website.

### **Security of Personal Information**

Spelman Johnson maintains reasonable technical and organizational measures to protect personal information from loss, misuse and unauthorized access, disclosure, alteration, and destruction. To the extent that we disclose personal information to third-party subcontractors, we require that such third-parties also maintain reasonable security and confidentiality measures and use the personal information in accordance with our instructions. In addition, where we disclose personal information to clients and other third parties mentioned in the preceding sections, we will request that they properly protect the security and confidentiality of such information, and otherwise process such data in accordance with applicable law. Our processing is based in the United States and we do not transfer any data outside our borders. We base the retention of our data on how recently an individual has engaged with us, defined as contact via social media, applying for a position or scholarship, commenting upon a blog, visiting our website or attending one of our sessions, lectures, podcasts, or other such contact.

### **Password-Protected Areas**

Certain areas of the website are password-protected and reserved for candidates and/or clients. It is your responsibility to safeguard any password and user ID that you use to access these portions of the website, and to notify our Webmaster if you ever suspect that this password and/or user ID has been compromised. You are solely responsible for any unauthorized use of this website conducted via your password and user ID.

### **Access to Personal Information**

Spelman Johnson 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 using the appropriate form. You may also request access and the opportunity to review the personal information that we maintain about you by sending us a written request at the postal or email address specified below. You have the right to be forgotten, to restrict processing, to withdraw consent and to be kept informed about the processing of your data. We will provide you with such information, and amend or delete such information upon your request, to the extent we believe appropriate or otherwise required under applicable data protection and privacy laws. We also reserve the right to take reasonable steps to authenticate your identity before providing such access.

### **Links to Other Internet Sites**

The website may provide links to other third-party Internet sites. Despite these linkages, or any references to Spelman Johnson at those Internet sites, this Privacy Policy applies to this website only. Please note when the URL indicates you are no longer on this website, and please read the privacy policy of each Internet site that you visit. Spelman Johnson is not responsible for the privacy practices of other Internet sites.

### **Foreign Visitors**

This website is hosted on our computer servers in the United States. If you reside in a jurisdiction outside the United States, by using the website or submitting any personal information, you expressly consent to the transfer of personal information to the United States as described in this Privacy Policy, some or many of which may have data protection laws that differ from the laws in your home country.

### **Changes to Our Privacy Practices**

Spelman Johnson reserves the right to change or amend our privacy practices as described herein and issue amended versions of this Privacy Policy from time to time at its sole discretion, as permitted by applicable law. If we make a material change to this Privacy Policy, we will post the revised policy on this Web page, and we will notify you of such change by posting a revised link at the bottom of the website home page that reads "Revised Privacy Policy."

Nothing in this Privacy Policy is intended to create an agreement or contract between Spelman Johnson and any person or entity using this website or providing any personal information.

Any questions about this policy may be directed to Margaret Holes ([mlh@spelmanjohnson.com](mailto:mlh@spelmanjohnson.com)/413-529-2895).