

Arsis Global Privacy & Data Protection/GDPR Charter & Policy

Arsis Global (referred as “AG”) assists organizations and individuals to transform in a fast-changing world of work by sourcing, assessing, developing and managing the talent that enables them to win. We develop innovative solutions for our clients, connect people with opportunities & assist candidates to reach their goals with innovative solutions/methods. Arsis Global is committed to the protection of the privacy and personal data of users.

In this Charter we describe the measures that Arsis Global takes to assist our clients to comply with applicable legislation, including the EU General Data Protection Regulation (“GDPR”) (EU) 2016/679.

1. Table of Contents	
2. About Us	2
3. WHAT PERSONAL DATA THAT WE COLLECT?	2
2.1. CANDIDATE DATA	2
CLIENT DATA	3
REFEREE DATA	4
SOURCE DATA	4
VENDOR DATA	4
4. HOW DO WE USE YOUR PERSONAL INFORMATION?	4
CANDIDATE DATA:	4
CLIENT DATA:	5
REFEREE DATA:	5
SOURCE DATA:	5
VENDOR DATA:	5
5. DATA COLLECTED VIA OUR WEBSITE & OFFLINE	5
What Personal Information Do We Collect?	5
How Do We Use Your Personal Information?	6
6. COOKIES POLICY	6
7. WITH WHOM WE SHARE YOUR DATA?	7
International Data Transfers	7
Legal Basis For Processing Personal Information (If You Are Resident in the EEA)	7
8. YOUR DATA PROTECTION RIGHTS	8
9. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?	8
10. HOW DO WE KEEP YOUR PERSONAL INFORMATION SECURE?	9
11. WHAT DO WE EXPECT FROM YOU?	9
12. UPDATES TO THIS NOTICE	9
13. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?	10
14. MODIFICATIONS AND AGREEMENT	10
15. ENTRY INTO FORCE	10

We use the following capitalized terms, as we cover personal information we collect:

- “Client” = any of our clients and their employees who are looking to recruit or assess executives and to whom we provide the Services.
- “Candidate” = any candidate, applicant, prospect, or Client employee who is considered, evaluated, or assessed by AG in connection with the Services.
- “Referee” = any individual who provides employment or personal references for a particular Candidate.

- “Source”= any individual who helps to identify and provide market intelligence about a potential Candidate.
- “Vendor” = any entity other than AG that provides products or services to AG pursuant to a contract with AG
 - (I) in connection with our recruitment, direct search, assessment, leadership advisory, , board evaluation, coaching, personal branding and other services (the “Services”), whether we are in the process of recruiting you as a Candidate for a role with a Client, assessing you as an employee of a Client, identifying exceptional Candidates for you as a Client, assessing you as a potential candidate, coaching you as a Candidate , retaining you as a Vendor, or engaging with you as a Source or Referee in relation to one of our Candidates); and
 - (II) when you visit our website <http://www.arsisglobal.com>) (the “Website”) and in the usual course of our business, such as in connection with our events and marketing activities

This Notice does not cover any other data collection or processing, including, without limitation, data collection practices of other web pages to which we provide links on our Website.

2. About Us

Arsis Global is a recruitment, direct search and business coaching company, providing services as recruitment & selection, management consultancy, HR consultancy, assessments, coaching, personal branding and talent management in partnership w Talentor International GmbH with multiple locations. We are working with individuals and private, public, and non-profit organizations in all industries and regions.

We are using the following terms in this Notice:

DATA COLLECTED VIA SERVICES: these are the information that we collect and process about Candidates, Clients, Referees, Sources, and Vendors.

3. WHAT PERSONAL DATA THAT WE COLLECT?

2.1. CANDIDATE DATA

Information Candidates provide to us: If you are a Candidate, you may provide personal information to us, for example, when you upload your résumé into our Candidate Portal through our Website, email your résumé to an AG search consultant, speak with an AG search consultant, or communicate with us in any way in connection with our Services. Further, as described below, we may obtain information about you from other sources.

You are not obligated to provide AG any information or participate in any of the Services we offer. As such, we will consider any information we collect directly from you as having been provided voluntarily. If, however, you are unwilling to provide us with certain requested information, please understand that this may limit our ability to consider you in connection with the Services.

The information we may collect for all Candidates typically includes:

- Contact details: such as your name, surname, e-mail address, postal address, and telephone number, gender.
- Résumé information: such as your contact details, employment history, educational history, professional qualifications, as well as languages and other skills and activities.
- Personality & lifestyle profile: memberships, hobbies, social activities, and/or individual preferences, intellectual capacity, personality, behavior, executive competencies, and/or character traits.
- Financial information: to reimburse expenses incurred in connection with the Services (e.g., travel, lodging and/or meal costs when attending an interview with a Client), we may collect certain financial information needed to document the expense and to reimburse you (e.g., bank account number and/or credit card number), payment information (when you paying online for our services)

- Other information: such as your prior military service, compensation and benefit details (where permitted by local law), performance history, details of any dependents, immigration status, and, any other relevant information you may choose to share with us. We also keep a record of your marketing preferences and our contact history with you.

We collect information in two ways:

- Directly, when you freely communicate your personal data to us
- Automatically via the technology used on our Applications

We collect your information when you:

- Browse our websites, look at products and use our services, job application;
- Create or edit your client account or user account in the dedicated area on one of our websites;
- Place an order or sign up for a subscription on one of our websites;
- Take part in one of our games or contests;
- Contact our customer service;
- Download a white book, e-book or any other documentation related to one of our products;
- Request a product demonstration or a quotation;
- Attend an event, conference or webinar;
- Wish to be contacted by a salesperson;
- Are invited to take an assessment and benefit from an assessment report

Information we collect from third party sources about Candidates: We may collect any of the above personal information about you from publicly available sources, and third parties, including, under the following circumstances: (i) Sources and Referees may disclose personal information about you; (ii) our Clients may share personal information about you; (iii) we may obtain information about you from publicly available third party sources (e.g., LinkedIn, news reports, press releases); When we obtain information about you from third party providers or vendors, we take appropriate steps to ensure that such third parties are legally permitted or required to disclose such information to us.

Information Clients provide to us: Our Clients may provide us with personal information about certain Candidates in connection with our Services (for example, they may provide us with a list of Candidates they would like us to assess through the Services). We typically process this personal information as a processor on our Client's behalf. We use that information to provide the Services to our Client and as instructed by our Client. Under these circumstances, it is our Client, as the controller, that controls what personal information about you we collect and how we use it. If you have privacy-related questions or concerns about a Client's privacy practices or the choices a Client has made to share your information with us or any other third party, you should reach out to the Client or review their privacy policies. We are not responsible for the privacy or security practices of our Clients, which may differ from those set forth in this Notice.

CLIENT DATA

Information Clients provide to us: We need to collect and use information about you or individuals at your organization in the course of providing the Services to you. We generally only need to have your contact details or the details of individual contact(s) at your organization (such as name, telephone number, email address, and job title) to ensure that our relationship runs smoothly. We also hold information relating to your online engagement with Candidate profiles through our Client applications and will keep a record of our contact with you. We may also hold extra information about you that someone in your organization has chosen to tell us.

Information we collect from third party sources about Clients: Where appropriate and in accordance with local laws and requirements, we may seek more information about you or your colleagues from other sources generally by way of due diligence or other market intelligence including: (i) from third party market research and by analyzing online and offline media (which we may do ourselves or employ other organizations to do for us); (ii) from attendee lists at relevant events; and/or (iii) from other limited sources and third parties.

REFEREE DATA

Information Referees provide to us: In securing a reference from you about one of our Candidates, we may process your contact details (such as name, email address, and telephone number). We may also process certain professional details (such as your job title, occupation, academic and professional qualifications, and employment history) and your connection to the Candidate (such your relationships to, experience with, and opinions about the relevant Candidate). We generally ask the Candidates to provide us with much of this information but we may supplement it with information we collect about you from publicly available sources (such as LinkedIn) or by asking you directly.

SOURCE DATA

Information Sources provide to us: We may process your contact details (such as name, email address, and telephone number), professional details (such as job title, occupation, academic and professional qualifications, and employment history) and information about your connection to our Candidate (such as your relationship to, experience with, and opinions about the relevant Candidate). We may collect this information directly from you and/or from publicly available sources (such as LinkedIn). In some cases, we may collect the information from our Candidates.

VENDOR DATA

Information Vendors provide to us: We need a small amount of information from our Vendors to ensure that things run smoothly. We need contact details of relevant individuals at your organization so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us).

4. HOW DO WE USE YOUR PERSONAL INFORMATION?

We may use the personal information we collect through our Services in a number of ways.

CANDIDATE DATA:

We typically use Candidate data for the following purposes:

Search & Recruitment & Management Audit & Consulting Services: to provide our Clients with the Services, including assessing your suitability for roles with a Client; contacting you about job opportunities or assessment assignments conducted for Clients or for you; sending your information to our Clients; and/or verifying the details you have provided (such as through psychometric evaluations/personality assessment or by requesting information from third parties (e.g., Referees or degree verification vendors)). We may also use your personal information for other business purposes such as data analysis, identifying usage trends, creating anonymized data sets for research, statistics and analytics purposes, creating knowledge pieces (such as white papers), determining the effectiveness of our Services, and/or to enhance, customize, and improve our features, products and services.

Marketing Activities: to send you information (such as reports, promotions, research, white papers, events and general information about, for example, relevant industry sectors) that we think you may find interesting (in each case, in accordance with your marketing preferences). To create a file of registered members, users, clients and leads in order to send personalized newsletters about our products and services and their evolution, through our news, events, invitations & promotional messages. To improve our products & services by inviting you to take part in polls, studies, satisfaction surveys & product tests.

Equal Opportunity Monitoring: to ensure that our recruitment processes are aligned with our commitment to ensuring equal opportunities. Some of the data we may collect about you (in appropriate circumstances and in accordance with applicable local law) falls under the umbrella of "diversity information". This could be information about your ethnic background, gender, disability, age, sexual orientation, religion or other similar beliefs, and/or social-economic background.

Some of this information is considered 'sensitive' personal information and as such, slightly stricter data protection will apply. Where required by law, we will obtain your explicit consent before we use it.

Where appropriate and in accordance with local laws and requirements, we will use this information to provide our Clients with diverse pools of qualified Candidates. We may also disclose this data (suitably anonymized where appropriate) to Clients where this is contractually required or the Client specifically requests such information to enable them to comply with their own employment processes or legal requirements – but again, only where in accordance with applicable local law.

CLIENT DATA:

We typically use Client data for the following purposes:

(1) *Search & Recruitment & Management Audit & Consulting Services:* to provide the Services to your organization; to manage our relationship and account with you and your organization; and/or for our other business purposes such as data analysis, identifying usage trends, creating anonymized data sets for research, statistics and analytics purposes, creating knowledge pieces (like white papers), determining the effectiveness of our Services, and/or to enhance, customize, and improve our features, products, and services.

(2) *Marketing Activities:* to send you information (such as reports, promotions, research, white papers, and event invitations) that we think you may find interesting (in each case, where this is in accordance with your marketing preferences).

REFEREE DATA:

We use Referee Data to obtain your opinion regarding Candidates in the course of providing the Services to our Clients. In addition, we may use your details to contact you in relation to any of our Services that we think may be of interest to you as a potential Client or Candidate.

SOURCE DATA:

We use Source Data to identify and gather information on potential Candidates in the course of providing the Services to our Clients. In addition, we may use your details to contact you in relation to any of our Services that we think may be of interest to you as a potential Client or Candidate.

VENDOR DATA:

We typically use Vendor Data: (i) to store (and update when necessary) your details in our database, so that we can contact you in relation to our agreements; (ii) to obtain support and services from you; (iii) to perform certain legal obligations; (iv) to help us target appropriate marketing campaigns; and (v) to help us establish, exercise, or defend legal claims.

5. DATA COLLECTED VIA OUR WEBSITE & OFFLINE

This Section applies to personal information that we collect and process through our Website in the usual course of our business, such as in connection with our events and marketing activities.

What Personal Information Do We Collect?

Information you provide to us: Certain parts of our Website may ask you to provide personal information voluntarily, for example, we may ask you to provide your contact details (like your name, surname, email address, and phone number) to complete surveys, subscribe to marketing communications (like newsletters), submit inquiries, and/or otherwise communicate or interact with us.

We may also collect personal information from you offline, such as when you attend one of our events. You are not obligated to provide AG any information or participate in any of the Services we offer. As such, we will consider any information we collect directly from you as having been provided voluntarily. If, however, you are unwilling to provide us with certain requested information, please understand that this may limit your ability to participate in the Services.

Information we collect automatically: When you visit our Website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws. Such automatically collected information may include your IP address, device type, unique device identification

numbers, browser-type, broad geographic location (e.g., country or city-level location) and/or other technical information. We may also collect information about how your device has interacted with our Website, including the pages or content accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Social Media Widgets: Our Website includes social media features, such as social media widgets that link to a social media website or allow you to share website content. These features may collect your IP address, which page you are visiting on our Website, and may set a cookie to enable the feature to function properly. Social media features, such as widgets, are either hosted by a third party or hosted directly on our Website. Your interactions with these features are governed by the privacy policy of the company providing it.

How Do We Use Your Personal Information?

We typically use the personal information we collect through our Website in the usual course of our business for the following reasons: (i) to respond to a request that you sent us, such as a request for information about our Services; (ii) to administer, protect, and improve our Website and our Services; (iii) to better understand the preferences of our Website visitors; (iv) to compile aggregated statistics about Website usage; (v) to provide you with marketing and promotional communications (where this is in accordance with your marketing preferences); and/or (vi) for other business purposes such as data analysis, identifying usage trends, determining the effectiveness of our marketing, and enhancing, customizing and improving our Websites, products and services.

6. COOKIES POLICY

Like many Websites, we use cookies or other similar technologies to collect and use personal information about you.

Cookies are small text files, encrypted, saved, and/or read by your browser, on the hard drive of your terminal (PC, laptop or smartphone for example) and left by websites that you visit. Cookies are generally used to allow websites to function more efficiently, in order to enhance user experience when visiting the website, as well as to provide information to the website administrators. Two types of cookies can be identified, which don't have the same purposes: functional (or technical) cookies and advertising cookies: Functional cookies are used throughout your navigation, in order to facilitate the execution of certain applications. A functional cookie can for example be used to memories the answers filled out in a form, or user preferences regarding the language, or layout of a website, when such options are available. Advertising cookies can be created not only by the website on which the user navigates, but also by other websites displaying advertisements, offers, widgets or other elements displayed on the page. These cookies can namely be used to do targeted advertising, that is advertising determined based on navigation of the user.

Use of cookies by AG

AG uses technical cookies to collect information during your visit AG's websites. We use these cookies for different reasons, most frequently to differentiate you from other users on our websites and allow us to compile statistics regarding their use. We also use cookies to help us offer you a better experience when you visit our websites, and to help us enhance our content and personalise your visit. Those cookies are stored on your browser for a period of 6 months. We do not use advertising cookies. However, if we were to use them in the future, we would inform you beforehand and you would have the possibility to deactivate those cookies. We use an audience analysis statistics tool which generates a cookies allowing measurement of the number of visits on the website, the number of pages viewed and the activity of users. The duration of retention of this cookie is limited to 6 months. Your IP address is also collected to determine the city from which you sign in.

We remind you, to all intents and purposes, that it is possible for you to oppose the placing of cookies by configuring your browser. Such a rejection could however prevent the proper functioning of the website.

7. WITH WHOM WE SHARE YOUR DATA?

We may share your personal information with the following types of third parties for the purposes described in this Notice:

- We freely share your information with our group companies. Your information is maintained on AG's database of ATS/CRM, which is secure and accessible only to AG employees.
- We may share your information with any competent law enforcement body, regulatory or government agency, court or other third party where we believe disclosure is necessary as a matter of applicable law or regulation; to exercise, establish, or defend our legal rights; or to protect your vital interests or those of any other person.
- In the case of Candidates, Referees, and Sources, we may share your information with Clients who will need to process your information for the purposes we have described in this Notice.
- In the case of Candidates, we may share your information with third parties who we have retained to provide services such degree and/or license verification checks, to the extent that these checks are appropriate and in accordance local laws.
- Similarly, for Candidates we may share your information with Sources and Referees with whom we liaise in connection with providing the Services to our Clients.
- For Sources and Referees, we endeavor to keep your information confidential from the Candidates you discuss with us, but under limited circumstances, your information may be disclosed to them.
- We may share your information with third party service providers (our Vendors) who perform functions on our behalf (including external consultants, business associates and professional advisers, such as lawyers, auditors, accountants, technical support providers, and third party travel agencies, outsourced IT and document storage providers).
- We may share your information with a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger, or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Notice.
- We may share your information with our marketing partners to send emails on our behalf.
- We may share information with any other person with your consent.

Please be assured that we do not sell your information to third parties or use the information for purposes that are incompatible with those set forth in this Notice. Whenever we share Personal Data with a third party, we strictly require that they process Personal Data provided by us only for the purposes mentioned and in accordance with our instructions, and that they always act in accordance with applicable laws regarding the protection of Personal Data.

International Data Transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different from the laws of your country (and, in some cases, may not be as protective).

Prior to any data transfer of Personal Data outside of the EU, AG is implementing all necessary measure to ensure the security of such transfers.

Specifically, our CRM/ATS database's – vincere.io - is hosted on AWS (Amazon Web Services) in Frankfurt/Germany. Our CRM/ATS database provider has 4 data centers globally to ensure that your data is hosted under the jurisdiction that is more relevant for our business..

Legal Basis For Processing Personal Information (If You Are Resident in the EEA)

If you are resident in the EU, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms (for example, in connection with the Services, we typically rely on our legitimate interests to process personal information for our Recruitment/Search/Selection/HR consulting/Coaching & Assessment and where permitted by law, certain marketing activities).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact on privacy@arsisglobal.com

8. YOUR DATA PROTECTION RIGHTS

You have the following data protection rights:

- If you wish to access, correct, update, or request deletion of your personal information, you can do so at any time by contacting on privacy@arsisglobal.com or logging in to your account on www.arsisglobal.com. When asked to remove a record from our database, AG will retain minimal personal information in order to prevent future contact, to keep a record of the information disclosed to our Clients and Candidates, and to preserve AG's interests in accordance with any applicable legal requirements.
- In addition, if you are a resident of the EU you can object to processing of your personal information, ask us to restrict processing of your personal information, or request portability of your personal information. Again, you can exercise these rights by contacting us on privacy@arsisglobal.com
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us on privacy@arsisglobal.com
- Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. If you withdraw your consent to our Notice, you will not be able to be a part of a AG search, assessment or selection or assessment project.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area are available [here](#).)

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

9. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We will retain information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with the Services or to comply with applicable legal, tax, or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

- Data related to prospect, candidate and clients management:

Your personal data will not be stored beyond the duration that is strictly necessary for the management of our business relationship with you, which has a three year time limit. At the end of this three years, we would reconnect with you in order to find out whether you wish to continue receiving our commercial offers.

However, in the case of data that has to be retained under legal obligation, the duration of how long it is kept for will be determined according to the law.

- Data related to bank cards:

We do not retain the data we receive from bank cards for any longer than the time needed for the completion of the transaction. However, this is not the case for clients who subscribe to our services. In that case, this data will be retained for the entire time of your subscription and at the very least until you complete your last transaction, in order to facilitate payment for regular clients. By checking the box specifically intended for this on the website, you are giving us your consent for this retention.

Data related to the visual cryptogram or CVV2, marked on your bank card, is not stored. In the case of payment by bank card, data related to the card could however be retained, for evidence purposes in case of a possible contesting of the transaction, as intermediary archive, for the duration planned by the Monetary and Financial Code

- The management of prospection opt-out lists:

Any information stored on a prospecting opt-out list will be retained for at least three years, from the date that you exercised your right to opt-out.

- Audience measurement statistics:

Any information used to identify users or provide access to their traceability and/or attendance, will not be retained beyond six months.

- Concerning the assessment process of Participants:

The Client agrees not to export, and retain Participants data beyond the purposes for which the data was collected.

However, AG reserves the right to keep all or part of the data collected anonymously (without last name, first name, or Participant ID), particularly for statistical purposes.

If you have any questions about how long we retain your personal information, you may contact us on privacy@arsisglobal.com

10. HOW DO WE KEEP YOUR PERSONAL INFORMATION SECURE?

Transmissions over the Internet are not completely secure or error-free. We do however take appropriate technical and organizational measures to protect your personal information from loss, misuse, unauthorized access, disclosure, alteration, and destruction. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information and to help ensure that your data is safe, secure, and only available to you and to those with authorized access. If you have any questions about the security of your personal information, you may contact us privacy@arsisglobal.com

11. WHAT DO WE EXPECT FROM YOU?

You must ensure that the information you have provided to us is relevant and up-to-date. You must also inform us,

12. UPDATES TO THIS NOTICE

We may update this Notice from time to time in response to changing legal, technical, or business developments. When we update our Notice, we will take appropriate measures to inform you of any material changes.

From time to time, we may refer to this Notice in notices and consent requests, for example related to Candidate searches or surveys. Under such circumstances, this Notice applies as modified in the particular notice or consent request.

You can see when this Notice was last updated by checking the “Last Updated” date displayed at the top of this Notice.

13. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

You are entitled to a right of access, rectification and erasure of your personal data, as well as a right of processing limitation and portability of your data. You are also entitled to the right to oppose the processing of your personal data on legitimate grounds and the right to oppose the processing of your data for prospecting purposes.

You can exercise those rights at any moment by contacting us

- By regular mail : 3 Khan Krum, Sofia, 1000, Bulgaria
- By email : privacy@arsisglobal.com

Note to EU residents:

- If you are a visitor to any of our Websites the controller of your personal information is AG
- If you are a Candidate, the controller of your personal information is typically the local AG entity that contacts you.
- If you are a Referee, Source, or Client, the controller of your personal information is typically the AG entity that is engaging with and managing the relationship with you.

14. MODIFICATIONS AND AGREEMENT

AG reserves the right to modify this charter at any moment, entirely or partially. These modifications will come into effect starting from the publication of the new charter. By using the website and AG’s Applications, you express your agreement to this Data Protection and Cookies Charter.

15. ENTRY INTO FORCE

This policy has been updated, in its current version, on May 15, 2018.