Horizon Executive Search

Connected. Bespoke. Trusted.

WEBSITE PRIVACY POLICY

Who are we?

We are Horizon Executive Search International Limited, Unit 8, The Courtyard, Holmbush Farm, Faygate RH12 4SE, info@horizonexecsearch.com, +44 1293 850756. We provide executive search services to clients looking to recruit personnel for their businesses. We also provide related Market Research, Talent Mapping and Salary Surveys.

What does this Policy cover?

This Privacy Policy explains our use of personal data processed through the website, if you choose to contact us and our use of business contact details. It also explains how we use candidate personal data and the personal data of our clients.

What personal data do we collect and why do we use it?

The table below explains who we collect personal data about, what that personal data is and the purpose we process it for.

The last column sets out the 'lawful basis' we rely on for processing that personal data which is a requirement of data protection rules. Essentially, companies may only process personal data if they can identify a lawful basis from a list set out in the legislation.

Individual	Personal Data	Source and Purpose	Lawful Basis for Processing
Candidates	CVs, identification documents, educational records, work history, employment record and references, interview notes or meeting transcripts, correspondence and other personal data provided by you as part of the recruitment or engagement process. We rarely process special category information such as racial, disability, trade union or health information where you have made this available to us.	We mainly collect this information directly from you during the recruitment, engagement and onboarding stages. Sometimes we collect information from third parties such as an agent acting on your behalf (e.g. an interim management company) or from a third party recommendation or a person giving a reference. We do use some publicly available sources to find information about potential candidates, specifically LinkedIn and company websites. Notes from meetings, market intelligence/research discussions or interviews with us may be produced using an automated note taking or transcription tool, which may	The processing is necessary for our legitimate interests of assessing suitability for potential roles, to find potential candidates. If you choose to give us special category data (listed in the second column), we obtain your express consent to process that.

		employ Artificial Intelligence (AI). Also see note below this table about software programs that may used to source candidates. We may also send you selective industry insights, whitepapers and event invitations that we think would be of most interest to you, or relevant for your potential role opportunities, with the option to opt out at any time.	
References/ referees	Contact details and correspondence.	Reference contact details may be given to us by candidates as part of a recruitment process. Other personal data about referees is given to us by you directly.	Our legitimate interests as a business in obtaining references on candidates.
Individuals who contact us with general queries	Contact details provided and correspondence.	This information is given to us by you. It is used to respond to the query and keep a record of it.	Our legitimate interests as a business in responding to and keeping a record of correspondence.
Clients and potential clients	Contact details, meeting notes or transcripts, and correspondence. Contracts.	This information is given to us by you or from publicly available information (for example on your website). It is used for us to fulfil contracts and engage in business discussions. We may also send you selective industry insights, whitepapers and event invitations, with the option to opt out at any time.	Our legitimate interests as a business in responding to and keeping a record of correspondence. Some information is also necessary for us to perform our contract – for example certain contact details.
Suppliers and contractors	Contact details and provided correspondence.	This information is given to us by you or from publicly available information (for example on your website).	Our legitimate interests as a business in responding to and keeping a record of correspondence. Some information is also necessary for us to perform our contract –

		It is used for us to fulfil contracts and engage in business discussions.	for example certain contact details.
Website visitors	Information from cookies. For more details see our cookie consent management tool on our website.	This information is collected via the cookies when you use our website. It is used for Analytics to help us understand how visitors use out website. It may also be used for Marketing purposes to show you advertisements from Horizon on Facebook.	We only install non-essential cookies with your consent. cookie consent management tool on our website

Where we have indicated in the table above that we rely on legitimate interests for processing of personal data, we carry out a 'balancing' test to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests, before we go ahead with such processing. [We keep a record of these balancing tests. You have a right to and can find out more about the information in these balancing tests by contacting us using the details below.]

Where we collect candidate information through publicly available sources as set out above, we may do this with the aid of software programs such as SignalHire. These programs are given parameters on the requirements of a role and search through publicly available sources to find such candidates. These programs are designed to only output information on candidates that meet the search criteria. The parameters of this program are restricted to only searching for [Name and Job role] candidate information from public sites where there is a reasonable expectation that such information may be collected and further processed by job recruiters for the purpose of sourcing candidates for different job roles. In some cases the programs used may employ AI.

How long do we keep your personal data for?

We keep your information only for as long as is necessary for the relevant purpose. For example, if we have a contract with you, this will be for 6.5 years after expiry in order to assist us with any contractual claims. We use a number of criteria for determining the retention period including obligations under law, our need to defend or bring contractual claims within the statutory limitation period and consideration of the original purpose we collected it for.

Who do we share your personal data with?

Data may be shared in the following circumstances:
Where you are a candidate:

- we share your personal data with the client who has a position to fill in order to determine with the client whether you are a good fit for an available position, We will always ask your permission before introducing you to a client for a particular search. Our clients are organisations across the aviation industry globally;
- we may also conduct checks in order to verify information you have provided and where we do this we share your information with the client or a third party agency to carry out the checks;

With professional advisors;
In the event of a sale of the company or its assets;
With suppliers but only subject to robust contractual protections;

Other companies in our group;

What happens if you do not provide us with the information we request or ask that we stop processing your information?

If you do not provide the personal data necessary, we may not be able to respond to your query or consider your application or request or match you with available role opportunities or to provide the relevant services to you.

Do we make automated decisions concerning you?

We do not carry out this type of processing activity.
Automated decisions are those made without human intervention that have a legal effect on you or other similarly significant effect (for example determining whether you are eligible for a job).

Do we transfer your data outside the UK and Europe?

We may sometimes transfer your personal data to countries outside the UK and European Economic Area, for example, if we are either using a supplier or working with a client based elsewhere. You can find the list of European member states by clicking on the following link: https://europa.eu/european-union/about-eu/countries/member-countries_en. The privacy laws in countries outside the UK and European Economic Area may be different from those in your home country.

Where we transfer data to a country that has not been deemed to provide adequate data protection standards, we always have security measures and approved model clauses or other adequate safeguards in place to protect your personal data. Please contact us if you would like more details about our safeguards for data transfers.

What rights do you have in relation to the data we hold on you?

By law, you have a number of rights when it comes to your personal data. Further information and advice about your rights can be obtained from the data protection regulator in your country. In the UK this is the Information Commissioner.
We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:
baseless or excessive/repeated requests, or
further copies of the same information.
Alternatively, we may be entitled to refuse to act on the request in some circumstances.
Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

Rights	What does this mean?
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Privacy Policy. If you have any additional questions, for example regarding transfers and locations of data or our legitimate interests basis, do please get in touch.

2.	The right of access	You have the right to obtain access to your information (if we are processing it), and certain other information (similar to that provided in this Privacy Policy). This is so you're aware and can check that we're using your information in accordance with data protection law.
3.	The right to rectification	You are entitled to have your information corrected if its inaccurate or incomplete.
4.	The right to erasure	This is also known as the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there is no compelling reason for us to keep using it. This is not a general right, there are exceptions.
5.	The right to restrict processing	You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
6.	The right to data portability	You have rights to obtain and reuse your personal data for your own purposes across different services. This is not a normal scenario for companies of our nature but if you have any questions you can contact us.
7.	The right to object to processing	You have the right to object to certain types of processing, including processing for direct marketing or where we are relying on our legitimate interests for processing (e.g. if you no longer want to be contacted with potential role opportunities.
8.	The right to lodge a complaint	You have the right to complain to us if you think we have not handled your personal data properly. Please email us at info@horizonexecsearch.com so we can try to resolve your concerns. If you remain dissatisfied, you can lodge a complaint with the ICO online at https://ico.org.uk/make-a-complaint/data-protection-complaints/ or use their contact details provided here.
9.	The right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

Updating this Privacy Policy

This Privacy Policy may be updated periodically to reflect changes in personal data protection legislation and best practices. When we make changes to this Privacy Policy, we will change the "last updated" date above and will notify you of any significant changes to this Privacy Policy.

How can you contact us?

If you are unhappy with how we've handled your information or have further questions on the processing

of your personal data, please email us at **info@horizonexecsearch.com** or contact us here: Horizon Executive Search International Limited, Unit 8, The Courtyard, Holmbush Farm, Faygate RH12 4SE.