

Privacy Policy - STONES INTERNATIONAL

Effective Date: 1st January 2019

Stones International Limited, along with its subsidiaries and network partner affiliates (collectively, “Stones International”), is a leading provider of global Executive Search and Leadership Advisory Services. Stones International greatly values your privacy and is committed to protecting your personal data. We maintain this Privacy Policy to articulate our commitment to your privacy.

In this Privacy Policy, we describe how we collect, use, and disclose information relating to individuals (“Personal Information”) who visit our website or participate in our executive or board searches or leadership consulting services (collectively, the “Services”). We communicate our Privacy Policy to all employees, and strictly enforce the safeguards within Stones International.

Summary of key points

Collection of Personal Information	In connection with our Services, we collect name, contact and employment details, as well as other Personal Information detailed below.
Indirect Data and Cookies	We automatically collect device information such as your IP address, browser, and operating system, along with information from Cookies in order to provide and maintain our Services and to present tailored advertisements that we believe are relevant to you, and provide choices on use of certain Cookies.
Use of Personal Information and Legal Bases of Processing	We use Personal Information to respond to your inquiries, provide and maintain our Services, and to satisfy our legal rights and obligations. Where applicable, we rely on your consent, the need to perform a transaction or satisfy our legal obligations, and our legitimate interests (which you have the right to object to), as our legal bases for processing your Personal Information.

Disclosure of Personal Information	We share Personal Information as necessary to provide our Services, including with service providers and clients in connection with the Services, and as necessary or permitted to satisfy legal rights and obligations.
Security of Personal Information	We maintain reasonable technical and organizational measures to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction.
Cross-Border Transfers	We provide appropriate protections for cross-border transfers of Personal Information.
Retention	We retain your Personal Information related to marketing activities for as long as you continue to accept such communications, and otherwise maintain your information for as long as necessary to provide the Services and satisfy legal obligations.
Data Subject Rights	You have certain rights to access your Personal Information in order to correct, delete, port, object or withdraw consent (such as for marketing) to certain processing of your Personal Information by contacting us as detailed below.
Contact Us	Please contact us as detailed below with any questions.

Personal information we collect

We collect various categories of Personal Information in connection with the Services. If you submit an inquiry or question via an online form or email to our website, we collect your name, email address, or other Personal Information contained in your correspondence, including information shared in a résumé, or CV. If you receive or participate in our executive, board search or leadership consulting services, we collect your name, title, professional and personal contact information, demographic data,

results of any assessment, survey, or questionnaire you complete, compensation, employment objectives, memberships, community involvement, details in your curriculum vitae (including your educational background, work history, and other qualifications), language skills, job performance, reputation, responses to interview questions, and financial details (to coordinate and reimburse for travel), which we collect from you or third party sources such as online searches, professional contacts, and your employer (only for our leadership consulting services). If you are a client or potential client, we collect your name, contact details, title or position, products or services requested, or other information that you provide including via online forms or email correspondence. Unless required or authorized by law, we do not process sensitive Personal Information about you, unless you have affirmatively consented to this processing.

Indirect data collection and cookies

This website automatically collects certain device information such as your IP address, unique device identifier, Cookies (as discussed below), geographic data, country, browser, device operating system, application version, language settings, and pages that have been shown to you. Note, however, we do not consider this device information to be Personal Information except where we link it to you as an individual or where applicable law requires.

This website also uses small text files called cookies, tags and other tracking technologies (collectively, "Cookies"), which are stored on your device or browser. As discussed in detail below, we use Cookies to provide our website, gather information about your usage patterns when you navigate this website in order to personalize your experience and to understand how visitors generally use our website in order improve our website. We also allow certain trusted partners to place Cookies on our website to collect information about how you interact with our website and other websites you visit. The information collected from these Cookies is used to provide advertising on other websites based on your interests, also known as interest based advertising. We also use these Cookies to determine how effective our advertising efforts are in order to improve the advertisements you see.

The Cookies on our website are generally divided into:

- **Strictly Necessary Cookies:** Cookies that are necessary in order to operate our website, such as maintain the security of the website. These are session Cookies that are erased when you close your browser.
- **Analytical/Performance Cookies:** Cookies that allow us to recognize and count the number of people who visit our website and understand how such visitors navigate through our website. This helps to improve how our website works, by ensuring that visitors can easily find what they are looking for on our website. These Cookies are session cookies which are erased when you close your browser.
- **Functional Cookies:** Cookies that improve the functional performance of our website and make it easier for you to use, including that you have previously

visited our website in order to maintain your language preferences. These Cookies qualify as persistent Cookies, because they remain on your device so we can provide the same experience during your next visit to our website.

- **Targeting Cookies:** Cookies placed by trusted partners which we use to understand how visitors interact with our website and other third party websites you visit, including the pages you have visited and the links you have followed, in order to show you advertisements based on your interests (also known as interest based advertising). These Cookies qualify as persistent Cookies, because they remain on your device for us to use during a next visit to our website.

Cookie choices

You can review your Internet browser settings, typically under "Help" or "Internet Options" for options you have to block certain Cookies. To learn more about Cookies used for interest based advertising, and to exercise certain choices you have regarding these Cookies, please visit the [Digital Advertising Alliance](#), [Digital Advertising Alliance-Canada](#), [European Interactive Digital Advertising Alliance as applicable](#), or the [Network Advertising Initiative](#). Please also visit the following specific links for additional information and choices on certain Cookies:

- [Google Analytics](#) - to analyze how you use our website

Please note that by opting out of certain cookies, you will not be able to access important functions or enjoy certain conveniences of this website.

How we use personal information

We may use Personal Information to respond to your inquiries and answer your questions about our Services. We may use your Personal Information in order provide and improve the Services, such as sourcing, identifying, assessing, and retaining talent for executive or board positions and teams, sending you executive or board positions that may be of interest to you, assessing leadership teams and organizations in efforts to improve their performance and culture, providing advisory guidance on needs and trends for our clients, and sharing thought leadership that may be of interest to you. We also may use Personal Information for the purposes of securing our website and IT systems and other business administration purposes, including as necessary to meet our legal and compliance obligations or in connection with regulatory inquiries, audits, legal claims, subpoenas, warrants, or other government/judicial processes or requests.

Some jurisdictions require that we explain the legal bases we rely on to collect, use, and share your Personal Information. We rely on several different legal bases to use your Personal Information, including: **(i)** as necessary to perform a transaction (in order to respond to your request, such as for information about a specific Service); **(ii)** as necessary to comply with a legal obligation (such as when we use Personal Information for record keeping to substantiate tax liability); **(iii)** consent (such as to send marketing or certain cookies, and process sensitive Personal Information); and **(iv)** necessary for

legitimate interests (such as providing, maintaining, securing, customizing, and improving the Services we provide to you). We also process information about you in an anonymized and non-attributable form for research and development purposes. The specific legal bases depends upon the Personal Information at issue and the context under which the information is collected. If you have questions about or need further information concerning the legal bases we rely upon to process your Personal Information, please contact us as detailed below.

Disclosure of personal information

We share Personal Information with our subsidiaries and network partner affiliates worldwide in connection with the performance of our Services in accordance with the conditions of this Privacy Policy. A list of the locations such offices and network partner affiliates is [here](#).

We also disclose Personal Information to third party service providers, such as auditors, information technology providers or referees in order to provide the website or Services to help support our business operations. We also share Personal Information with our clients as necessary in connection with an executive or board search for opportunities that we believe are of interest to you, as well as in connection with providing advice or assessments in connection with our leadership consulting services. We 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 is required by law or is appropriate in connection with any legal claims, subpoenas, warrants or other government/judicial processes or requests, as well as to protect visitors or the company, or to comply with applicable law. We do not sell or rent your Personal Information.

Security of personal information

Stones International 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 clients or third party service providers, we require that such third parties also maintain reasonable security and confidentiality measures and use the Personal Information in accordance with our instructions and applicable law.

Cross border transfers

Your Personal Information may be stored and/or processed in countries that do not provide the same level of protection for Personal Information as the data protection laws of your home country. We take appropriate steps, where required, to provide appropriate safeguards for Personal Information to be transferred, including, among others and as applicable, standard data protection clauses adopted or approved by the European Commission together with binding and enforceable commitments. Where

required by law, you can request a copy of such safeguards by contacting us as detailed below.

Retention

We typically retain Personal Information related to marketing activities for as long as you accept marketing communications from us, and upon request, we will securely delete your Personal Information so that you can no longer be identified from it, in accordance with applicable law. For Personal Information that we collect and process for other purposes, as described above, we typically retain such Personal Information for no longer than the period necessary to fulfill the purposes outlined in this Privacy Policy, and as otherwise needed to address tax, corporate, compliance, litigation, and other legal rights and obligations, after which we will securely delete and/or take steps to properly anonymize your Personal Information.

Access to personal information - Data subject rights

Stones International 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 [here](#). To opt out of marketing communications from us, please follow the instructions detailed in our communications to you.

Where required by applicable law, you have the right to obtain confirmation that we maintain certain Personal Information about you, to access the Personal Information we have about you, and to correct, port, delete, block or withdraw consent to the processing of certain Personal Information (without affecting the lawfulness of processing based on consent before its withdrawal), by contacting us as detailed below. In particular, you have the right to object to our use of your Personal Information, such as receiving executive or board openings. Please contact us below to exercise such rights. Please note that we need to retain certain Personal Information as required or permitted by applicable law.

Links to other internet sites

The website may provide links to other third-party internet sites. Despite these linkages, this Privacy Policy applies to our Services only. Please read the privacy policy of each unrelated internet site that you visit. Stones International is not responsible for the privacy practices of such Internet sites.

Changes to our privacy policy

Stones International reserves the right to change or amend Privacy Policy from time to time in 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 obtain your consent if required by applicable law. Nothing in this Privacy Policy is intended to

create an agreement or contract between Stones International and any person or entity using this website or providing any Personal Information.

Contact information

If you have any questions about this Privacy Policy, please contact our Privacy Policy Officer at lam.l@stones-international.com or by postal mail at:

Attn: Privacy Policy Officer
Stones International
19th Floor
39 Wellington Street
Central
HONG KONG

If you reside in the European Economic Area, you can also write to us at the following address:

Attn: Managing Partner
Stones International S.r.l.
Via Monte di Pietà, 21
20121 Milano
ITALY

As permitted by applicable law, you can contact your local data protection authority with any questions.