

Privacy Notice

We take data privacy seriously. This Privacy Notice explains who we are, how we collect, share, and use personal information, and how you can exercise your privacy rights.

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Copilot Consulting Limited take data privacy seriously. This Privacy Notice (“Notice”) explains who we are, how we collect, share, and use personal information, and how you can exercise your privacy rights.

This Notice covers personal information we collect (capitalised terms are defined below under Section 1, (Key Terms):

(a) in connection with our recruiting, and four different offerings, 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, retaining you as a Vendor, or engaging with you as a Source or Referee in relation to one of our Candidates (see Section 2); and

(b) when you visit our website (www.copilot-consulting.net) (the “Website”) and in the usual course of our business, such as in connection with our events and marketing activities (see Section 3).

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.

If you have any questions or concerns about our use of your personal information, please contact us using the contact details provided under the Section headed “How To Contact Us” below.

1. THE BASICS

About Us

Copilot Consulting Limited is a global agency, matching and delivering freelance and permanent candidates across SAP, ERP, and Change Management functions. Copilot Consulting is headquartered in the United Kingdom.

Key terms

In this Notice, the following terms have the meanings set forth below:

“Client” means any of our clients and their employees who are looking to recruit or assess executives and to whom we provide the Services.

“Candidate” means any candidate, applicant, prospect, or Client employee who is considered, evaluated, or assessed by Copilot Consulting in connection with the Services.

“Referee” means any individual who provides employment or personal references for a particular Candidate.

“Source” means any individual who helps to identify and provide market intelligence about a potential Candidate.

“Vendor” means any entity other than Copilot Consulting that provides products or services to Thorpe & Partners pursuant to a contract with Thorpe & Partners.

2. DATA COLLECTED VIA SERVICES

This Section applies to information that we collect and process about Candidates, Clients, Referees, Sources, and Vendors.

What Personal Information Do We Collect?

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 Copilot Consulting, speak with an Copilot Consulting search consultant, or communicate with us in any way in connection with the Services. Further, as described below, we may obtain information about you from other sources.

You are not obligated to provide Copilot Consulting 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, e-mail address, postal address, and telephone number.
- Résumé information: such as your contact details, employment history, educational history, professional qualifications, as well as languages and other skills and activities.

Under certain circumstances, we may also gather the following additional information about Candidates:

- Identification data: such as your civil/marital status, photograph, date of birth, gender, national origin, corporate identifier, national identifier (i.e., social security number or equivalent in your country, driver's licence, or national ID/passport number).
- Lifestyle preferences and personality profile: such as community involvement and memberships, hobbies, social activities, and/or individual preferences, intellectual capacity, personality, behaviour, executive competencies, and/or character traits.
- Health, diversity, and criminal conviction information: where appropriate, and in accordance with local law, we may also collect information related to your health, diversity information (including racial or ethnic origin, religious or other similar beliefs, and physical and/or mental health, including disability-related information), and/or details of any criminal convictions.
- 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).
- 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.

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); and (iv) we may source personal information about you from our third party data providers and degree verification/background check providers. 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 organisation 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 organisation (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 organisation 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 analysing online and offline media (which we may do ourselves or employ other organisations 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 organisation 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 agreements between us).

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 Activities: to provide our Clients with the Services, including assessing your suitability for executive roles with a Client; contacting you about board and executive search or assessment assignments conducted for Clients; sending your information to our Clients; and/or verifying the details you have provided (such as through psychometric evaluations 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 datasets for research, statistics and analytics purposes, creating knowledge pieces (such as white papers), determining the effectiveness of our Services, and/or to enhance, customise, 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).

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.

We may also collect other sensitive personal information about you, such as health-related information, religious affiliation, or details of any criminal convictions if this is appropriate in accordance with local law and is required for a role for which we are recruiting you. We will never do this without your explicit consent.

CLIENT DATA:

We typically use Client data for the following purposes:

(1) Search & Leadership Advisory Activities: to provide the Services to your organisation; to manage our relationship and account with you and your organisation; and/or for our other business purposes such as data analysis, identifying usage trends, creating anonymized datasets for research, statistics and analytics purposes, creating knowledge pieces (like white papers), determining the effectiveness of our Services, and/or to enhance, customise, 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.

3. DATA COLLECTED VIA OUR WEBSITE

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, 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 Copilot Consulting 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.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies and Similar Tracking Technology” below.

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.

This website uses cookies and similar technologies, which are small files or pieces of text that download to a device when a visitor accesses a website or app. For information about viewing the cookies dropped on your device, visit [The cookies IONOS uses](#).

These functional and required cookies are always used, which allow Squarespace, our hosting platform, to securely serve this website to you.

These analytics and performance cookies are used on this website, as described below, only when you acknowledge our cookie banner. This website uses analytics and performance cookies to view site traffic, activity, and other data.

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, customising and improving our Websites, products and services.

4. GENERAL INFORMATION

How We Share Your Information

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 Copilot Consulting database, which is secure and accessible only to Copilot Consulting employees worldwide.
- 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 as degree and/or licence verification checks, to the extent that these checks are appropriate and in accordance with 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 endeavour 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 use your information for purposes that are incompatible with those set forth in this Notice.

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).

We make use of third party servers located in the United Kingdom, United States, and elsewhere as needed to complete our services and meet local data compliance legislation. This means that when we collect your personal information we may process it in another country.

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

If you are resident in the European Economic Area, 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 Search & Leadership Advisory Activities and where permitted by law, certain marketing activities).

When required by law, we will collect personal information only where we have your consent to do so (for example, if we need to collect and process any sensitive personal information about you). In some limited cases, it may be necessary for us to process personal information and, where appropriate and in accordance with local laws and requirements, sensitive personal information, in connection with exercising or defending legal claims (for example, where we need to take legal advice in relation to legal processing or are required by law to preserve or disclose certain information as part of the legal process).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the Section headed “How To Contact Us” below

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 us using the contact details provided under the Section headed “How To Contact Us” below. Consistent with applicable law, when asked to remove a record from our database, Copilot Consulting 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 Copilot Consulting interests in accordance with any applicable legal requirements. If you are a California resident, you can submit a request to exercise your access and deletion rights with respect to your personal information via email to info@copilot-consulting.net. Please note that before processing your request, we may take reasonable steps to verify your identity.
- In addition, if you are a resident of the European Economic Area, 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 using the contact details provided under the Section headed “How To Contact Us” below.
- 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 using the contact details provided under the Section headed “How To Contact Us” below.
- 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 Copilot Consulting, assessment or leadership 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](#).)
- Our primary authority is The Information Commissioner’s Office (ICO),

<https://ico.org.uk/>, with whom we are registered under number C1403156.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Consistent with applicable law, we do not discriminate (as defined in applicable law) against individuals for exercising their legal rights with respect to their personal information.

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.

If you have any questions about how long we retain your personal information, you may contact us using the contact details provided under the Section headed “How To Contact Us” below.

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 organisational measures to protect your personal information from loss, misuse, unauthorised 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 authorised access. If you have any questions about the security of your personal information, you may contact us using the contact details provided under the Section headed “How To Contact Us” below.

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.

How To Contact Us

Please feel free to contact us with any comments, questions, complaints, or suggestions you might have regarding the information or practices described in this Notice.

You may contact us by sending a message to info@copilot-consulting.net You can also write to us using the details below:

Copilot Consulting Ltd.

2 Frederick Street, WC1X 0ND, London, United Kingdom

Important Note on the entity that is the controller of your personal information:

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