

# **Preng & Associates Privacy Policy**

## **May 2018**

This privacy policy sets out the privacy practices for Preng & Associates LLC., a company registered in the United States. As a subsidiary of Preng & Associates, LLC, Preng & Associates, LTD, a company registered in the United Kingdom with number 6631091 is also covered by this policy. The UK office is located at 42 Brook Street, London, W1K 5DB, United Kingdom. The company website is <https://www.preng.com> (the "Website").

In order to provide our services to our customers, we will need to collect and process certain personal information about individuals.. We are committed to protecting the privacy and security of their personal information, in accordance with the applicable data protection laws, including the General Data Protection Regulation, together the "Data Protection Laws." This privacy policy describes how we collect and use personal information.

If you have any questions at all about this policy or the Website, or about how we use and process personal information, please do not hesitate to contact us by e-mail at [compliance@preng.com](mailto:compliance@preng.com) or, alternatively, in writing to Preng & Associates, LLC, 2925 Briarpark Drive, Houston, Texas, USA 77042.

If we change our privacy policy we will post the changes on our Website.

### **OUR ROLE**

In order to enable us to consider someone for career opportunities as they arise we will need to gather and process certain personal information and, if you agree, we will store and use that information for that purpose. If an individual is not known by us, we may hold limited personal information so that we may make contact in order to test interest in a particular career opportunity or to promote our services.

For the purposes of the applicable Data Protection Laws, Preng & Associates, LLC is the data controller of the personal data.

### **WHAT INFORMATION WE COLLECT**

- In addition to the information we may obtain from public sources, we will collect certain personal information when beginning to create a relationship either directly, through our Website or by us approaching the individual. We may also require certain additional information from an individual in order to formally present his/her credentials to a specific customer. We may also conduct checks to verify information provided,

such as prior employment and college degrees, gather additional information, such as personal and professional references and background checks.

- We collect data from a number of public sources, including but not limited to LinkedIn, Boardex, and industry related print media and conferences, personal recommendations of former employers, teachers, colleagues and friends, third party assessment companies, and directly from the individual.
- We do not use any “automated” profiling data.

### **WHY WE GATHER AND PROCESS YOUR PERSONAL INFORMATION**

We collect personal information so that we can:

- identify and potentially make contact to discuss a specific career opportunity
- promote our business and market our services;
- manage our business, including for accounting and auditing purposes; and
- comply with our regulatory obligations.

We will only use personal information when the law allows us to, i.e. when it is necessary to:

- perform our contractual obligations towards our customers, with the individuals prior consent
- comply with our legal and regulatory obligations;
- pursue our legitimate interests (e.g. conducting our business in an efficient, compliant and profitable manner and the overall promotion of the business). We will also rely on our legitimate interests for the proper administration of our Website, and to manage our operations (for example, maintaining appropriate records and databases).

If an individual has provided us with personal individual contact details (for example, a personal email address), we will rely on the individual’s consent to make telephonic contact or send electronic communications emails with specific information. If we hold business contact details (for example, a work email address), we will rely on legitimate interests of the business to make telephonic contact or send electronic communications.

We will only use personal information for the purposes for which we collected it, i.e. contact the individual to determine interest in our service or to gain consent to present your credentials to our customer.

### **USES MADE OF THE INFORMATION**

We will use the personal information we receive to:

- Communicate with the individual in response to a specific request; for example career counseling, resume preparation advice or discussions of the job market.

- Communicate about a specific career opportunity to determine the level of interest, gather more information and potentially include the individual in a specific engagement we have.

## **DISCLOSURES OF YOUR INFORMATION**

We do not sell or share personal data with third parties for them to use for marketing purposes. We will share personal information, with the individual's prior consent and knowledge, with the following third parties:

- other companies within our group;
- our clients/customers for whom we are handling retained search assignments for a specific role/position.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect personal information. We do not allow our third-party service providers to use personal data for their own purposes, other than those provided in our contract of engagement; we only permit them to process personal data for specified purposes and in accordance with our instructions.

## **KEEPING YOUR DATA SECURE**

We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process personal information on our instructions and they are subject to a duty of confidentiality. While we will use all reasonable efforts to safeguard all personal data, the individual acknowledges that the use of the internet is not entirely secure and for this reason, we cannot guarantee the security or integrity of any personal data that are transferred via the internet. If an individual has any particular concerns about their personal information, they should contact us directly (see our contact details below). We have put in place procedures to deal with any suspected data security breach and will notify the individual's impacted and any applicable regulator of a suspected breach where we are legally required to do so.

## **TRANSFERAL OF YOUR DATA OUTSIDE THE EEA**

We may need to transfer an individual's personal data outside the European Economic Area (EEA), for example, if one of our customers is located outside the EEA. We will only do this transfer with the individuals prior approval and we will ensure that any transfer of personal data will be subject to appropriate safeguards, such as a European Commission approved contract (if appropriate) that will ensure the appropriate remedies are available in the unlikely event of a security breach.

## **DATA RETENTION**

We will retain personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Unless the individual directs us in writing not to keep it.

In some circumstances, we may anonymize the personal information so that it can no longer be associated with a particular individual, in which case we may use such information without further notice to the individual. Once we have been directed to no longer keep the personal information we will securely destroy the data in accordance with applicable laws and regulations.

## **THE INDIVIDUAL'S RIGHTS AND RESPONSIBILITIES**

### **Duty to inform us of changes**

It is important that the personal information we hold is accurate and current. Individuals should let us know if their personal information changes.

### **Rights in connection with personal information**

Under certain circumstances, by law, the individual has the right to:

- Request access to their personal information (commonly known as a “data subject access request”). This enables the individual to receive a confirmation from us as to whether we process any of their personal information or not, and if this is the case, to receive a copy of such personal information and to check that we are lawfully processing it.
- Request correction of the personal information that we hold. This enables the individual to have any incomplete or inaccurate information we hold corrected.
- Request erasure of the individual’s personal information (often referred to as “the right to be forgotten”). This enables the individual to ask us to delete or remove personal information where there is no good reason for us continuing to process it. The individual also has the right to ask us to delete or remove their personal information where they have exercised their right to object to processing (see below).
- Object to processing of their personal information where we are relying on a legitimate interest (or those of a third party) and there is something about their particular situation which makes it desirable to the individual to object to processing on this ground.
- Request the transfer of the individual’s personal information to another party.

If an individual would like to exercise any of the above rights, he/she should:

- email, telephone or write to us (see our contact details below);
  - provide us with proof of your identity and address (a copy of a driving license or passport and a recent utility or credit card bill). This is to verify your identity and prevent disclosure to unauthorized third parties; and
  - provide us with the details of the request, for example by specifying the personal data to be accessed, the information that is incorrect and the information with which it should be replaced.

Please note that if the individual requests erasure, objects to our processing of their personal data or requests the restriction of our processing of their personal data we will not be able to provide our services to them.

## **CONTACT US OR THE ICO**

If someone has any concerns or complaints about our privacy activities, you can contact us by email, telephone or mail. Our DIRECTOR OF COMPLIANCE'S contact details are:

EMAIL: [compliance@preng.com](mailto:compliance@preng.com)  
TELEPHONE: +1 (713) 266-2600  
MAIL: 2925 Briarpark Drive  
Suite 1111  
Houston, TX, USA 77042

If an individual is covered under the GDPR they can also contact the Information Commissioner's Office on +44 (0) 303 123 1113. For more details about the individuals rights under the Act, the rules we have to adhere to in collecting and storing information, and how to check their data records, please visit <https://www.gov.uk/data-protection/the-data-protection-act>

## **OUR COOKIE POLICY**

This Cookies Policy explains how Preng & Associates uses cookies and other tracking technologies through our Website <https://www.preng.com> (our "Website"). If an individual does not accept our use of cookies they should disable them following our guidance below.

### **What are web cookies?**

Web cookies are small files that are placed on your computer or mobile device by a website when you visit it. They contain details of the individual's browsing history on that website and distinguishes them from other users. Cookies send data back to the originating website on each subsequent visit or allow another website to recognize the cookie. Cookies are useful because they allow a website to recognize a user's device and, for instance, remember your preferences and generally improve your online user experience. Like most websites, we use cookies.

Although this Cookies Policy refers to the general term "cookie", which is the main method used by this website to store information, the browser's local storage space is also used for the same purpose and we may use other tracking technologies through this website such as web beacons. As a result, the information included in this Cookie Policy is likewise applicable to all such tracking technologies that we use. More can be learned about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org)

### **Why do we use cookies**

To collect anonymous statistics – the information collected by cookies enables us to improve the website through usage figures and patterns. For example, it is really useful to see which

pages of the website – and therefore which of our services – are the most popular and how users are interacting with them.

## **Types of cookies we use**

- Strictly necessary cookies. These are cookies that are required for the operation of our Website. They include, for example, cookies that enable a user to log into secure areas of our Website.
- Analytical/performance cookies. They allow us to recognize and count the number of visitors and to see how visitors move around our Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

## **Website cookie acceptance**

By visiting and using our Website individuals have consented to our use of cookies as updated from time to time. In particular, they have consented to cookies being stored on their computer and/or mobile device, unless rejected or disabled in their browser.

## **Turning cookies off**

Internet browsers normally accept cookies by default. However, most browsers allow the turning off of either all or third-party cookies. What a user is able to do depends on which browser is used. If the user does not accept our use of cookies as set out above, they should set their browser to reject cookies. However, please be aware that this may impair or limit the ability to use our Website. The option to do this is usually found in the options, settings or preferences menu of the browser or mobile device.

The user may opt-out of Google's analytics cookies by visiting Google's opt-out page - <https://tools.google.com/dlpage/gaoptout> Click on the links below to find out how to change the cookie settings in:

[Internet Explorer](#)

[Firefox](#)

[Chrome](#)

[Safari](#)

[Opera](#)

[iPhone and iPad](#)

[Samsung](#)

## **Updating our Cookie Policy**

We may update our use of cookies from time to time and consequently, we may update this Cookies Policy.