

DATA PROTECTION POLICY

This data protection policy defines the internally approved data protection principles for processing of personal data within Horton International Denmark. Data protection and privacy are very important to Horton in the relation between customers, job candidates and their respective business environment. Personal data on job candidates (data subjects) will be collected and processed so that Horton can serve its customers who acquire executive search processes or other related services. In general we follow below principles:

- we only collect necessary information for any specific task
- we only use personal data restricted to the task in question
- we only keep personal data for a minimum of time
- we only collaborate with third party clients following this policy

Policy scope

This policy will endeavour to ensure that the legal rights of Horton customers, job candidates, own employees as well as of other constituencies are enforced with respect to processing of personal data by us and our data processors. We pay special attention to confidentiality of and access rights to personal data. We want to ensure that nobody will be harmed by processing of his/her personal data and that rights of the data subjects are implemented.

Processing data

In this policy personal data means any information relating to an identified or identifiable natural person. Identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, and online of that natural person.

The data collected may include information such as name, picture of candidate, contact information, place of residence, historical compensation data, data revealing working history, education, information provided by candidate, agreements signed with Horton, information provided by people giving references about candidate, a consultant subjective view of a candidate for the given executive search assignment. Data created and collected during communication includes information on the communicating parties, time of the connection, routing information, data transfer protocol and format of the connection.

Principles for processing personal data

We will ensure that the processing of personal data is lawful, fair and transparent for the data subject. We will inform the data subjects e.g. of what personal data is collected from them, for what purpose, where the data is collected from and where the data is transferred. We collect personal data from open public sources such as social media, news, tax officials, company websites, from candidates themselves, business networking etc.

Responsible person is named at the end of this policy for the respective data register. You can always turn to him/her if you have any questions concerning that data register. The collection and processing of personal data is always based on legislation, customer agreement, the legitimate interest of Horton or other pertinent connection, or the consent of the data subject.

Rights of the data subject

We will ensure that we will inform the data subjects appropriately and in a timely manner of the processing of data and their rights regarding data processing. The data subject has the right to inspect data, the right

to be forgotten, the right to data portability, the right to object automated individual decision making such as profiling, demand the rectification and the deletion of data, as well as the right to object and restrict the processing of data belong to the rights of a data subject. We act in a transparent manner. We will ensure in our operations that the rights of the data subject will be taken care of, and that the data subjects are appropriately informed, and that his/her requests are responded swiftly.

Restriction in personal data

We will collect personal data only for a specific purpose, defined in advance. Data collected for a specific purpose may not be used for other purposes. Unless it is obvious that personal data is required for a specific justified purpose, data should not be collected and stored, and it should be erased.

We will collect only the appropriate and essential data that is necessary for the purpose in question. The data collected may not be too excessive for the purposes they are collected. Principally, we will not collect sensitive data such as racial and ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, sexual preferences, health, illness or disability to the personal data files of Horton.

Updating personal data

We will not process erroneous or outdated personal data and we will update or delete the data when necessary. We will update, e.g. the contact details of the data subject at necessary intervals using a trusted source or provide the data subject with an opportunity to do it him-/herself.

All data will be stored electronically or into paper as physical documentation. Information will be collected to Horton Executive Search database. Only administrators will have access to the database. Such access is protected with user right management. User interface will only show data that is necessary for the tasks of the respective person. The views of the user interface as well as the access rights have been defined based on role and user.

We will use appropriate technical and organizational means to secure the personal data from inappropriate access, accidental or unlawful destruction, amendment, distribution and transfer of personal data as well as from other unlawful processing.

Third parties

Horton will only transfer your personal data to its executive search assignment clients and consultancy companies who own Horton and perform assignments for Horton. Horton engages subcontractors to perform parts of the service, such as companies performing candidate testing services. They may have access to personal data so that they can perform their duties but only to the extent required for their performance. When transferring personal data to third parties, Horton always agrees in a separate written agreement the rights and obligations of the service provider in accordance with the applicable laws.

We may also provide access to information to our affiliated companies and other parties belonging to Horton group of companies globally.

Data transfer

Personal data collected by Horton can be transferred to another European Economic Area member state (EU member countries and Iceland, Liechtenstein and Norway) in accordance with the same principles allowing transfer and processing within Denmark. We will transfer data outside Danish borders only if it is required in the executive search assignment.

We will only transfer personal data outside the EEA Area or to an international organization where the European Commission has decided that the third country, a territory or one or more specified sectors within that third country, or the international organization in question ensures an adequate level of protection.

In the absence of the aforesaid decision we transfer personal data to a third country or an international organization only if the processor has provided appropriate safeguards, and on condition that enforceable data subject rights and effective legal remedies for data subjects are available. Such appropriate safeguards may consist of relying on Privacy Shield (US) or using the EU Model Clauses.

Data storage time

We strive to store the personal data in a form from which the data subject is identifiable for as long as it is necessary to achieve the purpose of the data processing. We will define retention periods for the collected personal data. The premise concerning the retention of data is that we will only use the data for as long as necessary considering the purpose of the data, but for no longer than two years, after which we will renew consent for data processing or delete the personal data.

Data security and confidentiality

We strive to ensure the appropriate data security of personal data by protecting the data from unauthorized and unlawful processing and destruction of data by using the appropriate technical and organizational measures. Technical and organizational measures shall mean various security measures, which are used to ensure the data security of personal data in electric and paper form. Such measures may be, e.g. personnel training and guidelines, non-disclosure commitments, premises supervision, supervision of use, information system data security and technical restrictions, monitoring, inspection and supervision systems, data encryption, anonymisation (removal of personally identifiable information where it is not required) and pseudonymisation of data (replacing personally identifiable information with pseudonyms).

We will restrict access to databases containing personal data to persons, who require access to the personal data due to their duties. When transferring personal data to third parties, Horton always agrees in a separate written agreement the rights and obligations of the service provider in accordance with the applicable laws.

Ensuring data protection

Data protection training is part of introduction of new people in Horton. We also train our staff regularly on data protection and privacy issues. Taking good care of data protection and privacy aligns well with our business procedures and values. All persons having access to personal data will be bound by obligation of confidentiality as specified in the applicable laws and their employment or other agreements.

We will investigate of any suspected data breaches without delay. We will inform supervisory authorities and data subjects as required. The person responsible for the data protection issues in Horton will issue more detailed guidance on this.

At Horton, the employees are offered guidance and training concerning data protection matters. Each person is obligated to follow this Horton Data Protection Policy. Data subjects and other constituencies are also obliged to follow this Horton Data Protection Policy which is always available for inspection at <https://www.hortoninternational.com/global-offices/denmark/en>. We will update this policy as required and issue any necessary further instructions of data protection.

Rights of the data subjects

We will ensure that we will inform the data subjects appropriately and in a timely manner of the processing of data and their rights regarding data processing. The data subject has the right to inspect data, the right to be forgotten, the right to data portability, the right to object automated individual decision making such as profiling, demand the rectification and the deletion of data, as well as the right to object and restrict the processing of data belonging to the rights of a data subject.

We act in a transparent manner. We will ensure in our operations that the rights of the data subject will be taken care of, and that the data subjects are appropriately informed, and that his/her requests are responded swiftly.

In addition to the rights described above you are entitled to make a complaint to the data protection authority, especially in the European Union country where you have your domicile or permanent work place or where the claimed breach of data protection regulation occurred. In Denmark, this authority is Datatilsynet.

Contact person

Horton has appointed a person who develops and steers implementation of data protection within Horton.

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Approval of the data protection policy

The Board of Directors of Horton Denmark has approved this policy 24.05.2018