

## Privacy Policy

### 1. Our Commitment to Privacy

At Thomas Cole Kinder we respect the privacy and the confidentiality of the personal information provided by or on behalf of potential candidates, our clients recruiting such candidates, and outside parties who assist us in our search by providing references and other pertinent information. We are committed to keeping the personal information you share with us, whether over the Internet, on the telephone or through our office, confidential. The use of such information will only be for the purpose for which it was collected. This Privacy Policy explains how Thomas Cole Kinder collects, uses, discloses and protects the personal information we obtain.

### 2. What is Personal Information?

Personal information is any information about you as an identifiable individual and includes information with respect to your name, address, age, gender, income, marital status, financial situation, health, current employment and compensation package, and previous employment history and compensation package, together with your personal references.

### 3. Important Principles for Your Protection

Our Privacy Policy consists of the following key principles:

- **Collecting and Using Personal Information**  
Either before or when we collect personal information about you, we will explain how we intend to use it. We will limit the personal information we collect to what we need for those purposes, and we will use it only for those purposes. We will obtain your consent if we wish to use your personal information for any other purpose.
- **Disclosing Personal Information**  
We may provide your personal information to clients, or to others where we are required to do so by law.
- **Protecting Personal Information**  
We will protect the personal information we obtain about you with appropriate safeguards and security measures.
- **Access to and Accuracy of Your Personal Information**  
We will give you access to the personal information we retain about you. We will provide you the opportunity to update the personal information we retain to ensure it is accurate.
- **Accountability and Openness to Your Privacy Concerns**  
We will explain your options of refusing or withdrawing consent to the collection, use and release of your personal information, and we will record and respect your choices. We will investigate and respond to your concerns about any aspect of our handling of your personal information.

The following sections will answer most of the important questions that you may have about how we fulfil each of these important principles, and how we will hold ourselves accessible and accountable to you.

### 4. Why We Ask for Your Personal Information

If you are a candidate, we ask you for information to consider your qualifications and interest to be referred to either a specific client, for a specific position, or to other clients who may retain us to recruit an individual with interests and qualifications similar to yours.

If you are a client who has retained Thomas Cole Kinder to recruit candidates for your organisation, we ask you for information so that we can do a proper search and discuss your needs, expectations, organisational culture and other relevant issues with potential candidates.

If you are a referee for one of our candidates, we ask you to answer specific questions to validate the information we have about our candidate and to explore his or her skills and experience relative to the role in question, to assist our clients in their selection process.

## **5. How We Collect Personal Information About You**

If you are a candidate, much of the information we collect comes directly from you. We may also obtain personal information about you from third parties to help us assess your eligibility and suitability as a candidate for positions for which we are recruiting on behalf of our clients.

While we always try to protect the privacy of our candidates and clients, we understand you may choose to refuse or withdraw consent to the collection, use and release of your personal information and we will record and respect your choices. Please be aware that this may result in our inability to present you to our client as a candidate for the position in question.

## **6. When We Release Your Personal Information**

We release your personal information to parties outside Thomas Cole Kinder only under the following circumstances:

- To our clients who retain us to recruit an individual or retain us to identify individuals with interests and qualifications similar to yours
- When Required or Permitted by Law – in certain circumstances, the law may require or permit Thomas Cole Kinder to disclose your personal information without your knowledge or specific consent. For example, such information may be disclosed if required to comply with a subpoena, warrant or court order, or if requested by a government institution which has the lawful authority to obtain the information.
- In exceptional circumstances it may be necessary that we disclose your personally identifiable information if we believe, in good faith, that disclosure is otherwise necessary or advisable to protect Thomas Cole Kinder's interests. We will seek to ensure that any proposed disclosure is required in the circumstances and then ensure that we disclose only the information that is required.
- Under no circumstances do we sell personal information to other organisations

## **7. Understanding Your Options**

We will explain your options of refusing or withdrawing consent to the collection, use or release of your personal information, and we will record and respect your choices. In many cases you are free to refuse or withdraw your consent at any time. You may do so by contacting us in writing.

## **8. How We Protect Your Information**

Thomas Cole Kinder stores and processes your personal information in our server, located in London, using technological safeguards such as security software and firewalls to prevent hacking or unauthorised computer access as well as internal passwords and security policies.

We will audit our procedures and security measures regularly to ensure that they are being properly administered and that they remain effective and appropriate.

## **9. Your Right to Access Your Information**

We will give you access to the information we have about you. You may arrange such access by writing to us. We will advise you in advance if a minimal charge will be required for conducting the search, and we will respond to your request promptly, but in any case within 30 days, unless we advise you to the contrary.

Please note that we may not be able to provide information about you from our records if it contains references to other persons, is subject to legal privilege, contains information proprietary to Thomas Cole Kinder or cannot be disclosed for other legal reasons. If you have any questions regarding decisions made, we will tell you the reasons for those decisions.

#### **10. Keeping Your Information Accurate**

We will give you the opportunity to keep your personal information accurate and up-to-date. Having accurate information about you enables us to give the best possible service to our clients and candidates. You can help by keeping us informed of any changes. If you find any errors in our information about you, let us know and we will make the corrections as soon as reasonably possible and make sure they are conveyed to anyone we may have misinformed. For information that remains in dispute, we will note your opinion in the file.

#### **Contact**

For information on any aspect of our Privacy Policy, contact:

Thomas Cole Kinder  
24 Old Bond Street  
London  
W1S 4QA  
Email: [info@tck.co.uk](mailto:info@tck.co.uk)