



NAPOLEON CONSULTING TAKES THE ISSUE OF PRIVACY EXTREMELY SERIOUSLY.

We at Napoleon Consulting Limited, are committed to protecting Personal Information. We provide a safe and secure service for all individuals who are referred to us by client organisations. We ensure that the information submitted to us is used accurately and only for the purposes set out in this policy. This Fair Processing Notice (the 'Notice') describes our data collection practices, use, and transfer of information collected by Napoleon Consulting. The information you provide us with can be submitted to us in person, via email or via an on-line service.

Personal Information we collect

Napoleon Consulting collects information that identifies you as an individual ("Personal Information") to provide services to our clients and to operate our business. The type of Personal Information we collect about you depends on the service offering being delivered.

- During our services, we may collect Personal Information such as your: name, e-mail address, telephone number, location, first language, CV / Resume aspects (e.g. job title, work history, education) and references.
- If you are taking part in a Napoleon process for either recruitment or development, we may ask if you would like to record your own demographic indicators (for example your age group, gender, ethnic background). This is used only for the purposes of statistical analysis in the field of diversity and inclusion and is not a part of any Napoleon Consulting assessment. This information is completely voluntary in the case of an assessment service.
- For certain services a client may request demographic information to be included within the project reporting element in relation to our offering. We, in turn, may request this information from yourself. For instance, for services relating to diversity and inclusion agendas we may include demographic questions on: gender, race, age or ethnicity.
- If necessary, we will ask for information regarding your physical health for accessibility purposes.
- We do not require any other sensitive information from you, unless asked for in these limited situations. For instance, we will not ask for sensitive information relating to political opinions, as part of normal practise.
- With regard to referencing, we will store information about the referees we speak to, along with their written reference, for five years. We may collect the following information: dates and time working together, a reference about the person. We may also invite you to share biographical information such as gender and ethnic background.
- Please do not provide us with any Personal Information if you do not agree with this Policy.

How we collect personal information

As you interact with Napoleon Consulting, you provide some Personal Information directly.

We may collect Personal Information when you register to use our Online Platform, submit your CV, complete online surveys, psychometrics or 360s.

If you submit Personal Information about other people to us, you represent that you have the authority to do so and permit us to use the information in accordance with this Policy.



Personal Information about you may also come from our clients to whom we provide Services. These clients may be your employer or an organisation with which you are seeking employment.

How we use the information we collect

Napoleon Consulting uses the Personal Information collected to support the delivery of our Services. This information is held, used and disclosed by us as follows:

- Fulfilling client requests: to help Napoleon Consulting to fulfil our contractual obligations with a client, where you may be a current or prospective employee of that client.
- Fulfilling your requests: to answer any questions you may have about Napoleon Consulting, our processes or for any other request you may have.
- Analytics: we may retain and use Personal Information about you for benchmarking, creating norms, including validation studies, to improve and enhance our services or to develop new Services in the field of leadership development. The end product will be aggregated and anonymised and therefore is no longer considered Personal Information due to the fact that you cannot identify any individual. The norms we develop across particular industries, geography or levels, when compared with your own Personal Information, generate insights and form a significant part of the assessment and referencing offering for our clients.
- Third Party Sub-processors: Napoleon Consulting use third parties, who comply with similar undertakings of privacy and confidentiality as Napoleon Consulting, as they perform outsourced operational functions on our behalf and who also provide services to us. These organisations include:
 - Technology operations companies who run Napoleon Consulting's IT or support Napoleon Consulting's systems.
 - Psychometric Assessment Suppliers.
- Operating our Business: your name and date of the delivery of a service to a client may be included in such matters as client audits, internal communication, administering our services, procurement and financial transactions.
- Law: we may also release Personal Information to regulatory or law enforcement agencies, if they require us to do so. We will also disclose subject information where we are permitted and requested to do so by law.
- If we wish to use your information for any of the reasons not listed above, we will seek your explicit consent to collect, hold, use and disclose your Personal Information.

How Napoleon Consulting works with you

As defined under GDPR, Napoleon Consulting is a data controller. As we determine the purposes and means of processing Personal Information, this classifies us as a data controller. This relates to the way in which we work with our clients and with you.

Where a client has requested that Napoleon Consulting provide a leadership consulting service to them which relates to you, this service will always be commissioned by our client with your knowledge and agreement. This service may be in relation to assessment and referencing (for recruitment, development or due diligence), coaching, workshops, psychometrics or other leadership consulting services.



At the beginning of Napoleon Consulting's engagement, we will ask for basic information like contact details. During an assessment process you will be asked, verbally, to share personal and career history with your assigned Napoleon consultant. We will also ask you to complete psychometric profiling tests.

Your Napoleon Consulting assessment report will make recommendations to our client about your potential and/or development profile. Your psychometric profiling data will form part of an overall assessment by the consultant. Where applicable, referencing will be integrated into the assessment report too. This assessment report is developed individually by the consultant and is not automated.

Whenever your record appears in an analysis from our benchmarking database, this will be in aggregated and anonymised form, and you will not be identifiable by the recipient of such an analysis. Napoleon Consulting's data subjects' individual Personal Information, and the benchmarking database, are not shared with any other organisations.

Who has access?

How your Personal Information is disclosed will depend upon the situation: –

While providing our Services, we will disclose your Personal Information to our client who has engaged our services in relation to yourself. We will not share any of your Personal Information with any other client.

Napoleon Consulting discloses Personal Information to third parties who provide support for our Services of business operations. These include, but are not limited to, IT consulting services, and any audit administration firms commissioned.

Retention period of personal information

In general, we will retain your Personal Information for the necessary period to fulfil our purpose as defined by GDPR regulations. This is commonly a five-year retention period for our services, with our reports being valid for a two-year period. We will only retain information about you past this five-year retention point if it is necessary: such as your name, email address and why and when you used our services.

Location of personal information

Napoleon Consulting is a UK consulting organisation, with staff in the United Kingdom and the EU. Our policy on data storage is to store EU subject Personal Information within the EEA.

Use of the internet

Given that the Internet is a global environment, the use of the Internet to collect and process Personal Information necessarily involves the transmission of data on an international basis. Therefore, by browsing our website and/or communicating electronically with us, you acknowledge and agree to our processing of Personal Information in this way.

Your choices regarding your information

The Personal Information you give us is provided on a voluntary basis. However, if you do not wish to share some Personal Information with us, you may not be able to participate in our services.



You have the right to ask Napoleon Consulting to stop using your information. Napoleon Consulting's policy is to make every effort to satisfy the requests of data subjects relating to access requests and data deletions. After your engagement with Napoleon Consulting, if you wish to access, correct or do not wish us to retain your Personal Information, please refer to the contact details below. We may ask you to verify your identity, and to put your request in writing.

However, if your request involves deletion of your file, please be aware that in some circumstances, we may not be required or able to do so, particularly where your file also holds information about our clients or includes financial information that we need to keep for periods of up to five years. Where we are unable to comply with your request, we will provide reasons for not doing so. For instance, we may need to retain your email address so as to be able to honour other opt-out requests.

Updates to our Privacy Notice

This Fair Processing Notice may be changed by Napoleon Consulting at any time. If we change it in the future, we will advise you of changes or updates by a prominent notice on our website. Continued use of this website or our services after such changes will constitute your acceptance of such changes.

Contact us

If, at any time, you have questions or concerns about Napoleon Consulting's online privacy commitment, please feel free to e-mail us at aiden.walsh@napoleonconsulting.com or by writing to us at:

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