

# VIEWCREST ADVISORS

## Viewcrest Advisors' Privacy Policy

*revised and effective August 5, 2019*

Viewcrest Advisors, Ltd. is committed to your privacy and to protecting your personal data.

In this Privacy Policy, we describe how we collect, use, and disclose information relating to individuals ("personal data") who participate in our executive or board searches. We communicate our Privacy Policy to all employees, and enforce the safeguards described in this Privacy Policy within Viewcrest Advisors, Ltd.

We urge anyone who interacts with our firm (candidates, clients, network sources, partners and others) to carefully read this Privacy Policy and understand our approach to handling personal data. If at any time you have any questions regarding this Privacy Policy or our information practices, we encourage you to contact us.

*A note about our website:* Viewcrest Advisors, Ltd.'s website is specifically designed to showcase our and our clients' work, without directly engaging with individual candidates, clients, network sources or others. Our preferred methods of interaction with all parties remain email, telephone, and video or in-person meetings. We generally do not use any information collected via our website; although our web hosting service automatically collects certain device information such as your IP address, unique device identifier, cookies (small text files called "cookies" tag and track the activities on your device or browser), geographic data, country, browser, device operating system, application version, language settings, and pages that have been shown to you, we do not analyze this data, nor do we tie it to other personal data that we collect about you. The following sections of this Privacy Policy are primarily applicable to information we collect through channels other than our website.

### **I. Collection of personal data**

We collect and process your personal data in several ways:

- *Information that you provide us* when you interact or correspond with us by telephone, e-mail, through video or in-person meetings, or otherwise. The information you give to us may include your name, address, e-mail address, telephone number, employment and/or education history, personal description or biography, professional resume/qualifications, job title(s), demographic data, compensation expectations, employment objectives, professional or volunteer memberships, community volunteerism, language skills, job performance, reputation, responses to interview questions, materials you might prepare for a client of Viewcrest Advisors, Ltd. requested as part of a board or executive search process, financial account information (for the limited purpose of coordinating and reimbursing for any search-related travel), reference names or professional contacts, and any request for services (if seeking to engage Viewcrest Advisors Ltd.'s services).
- *Information we gather through research about you and your career.* We may collect information about you from publicly available sources including organizational or corporate websites, to include LinkedIn, Candid/GuideStar, any other social media on which you have a profile, hard-copy or online conference brochures where you might be, or have been, a speaker.
- *Information we gather from other sources,* to include from individuals who provide a reference for you, or might act as an intermediary to introduce us to you, or might extend to you an interview invitation or job offer in connection with a board or executive search.

# VIEWCREST ADVISORS

## II. Use and disclosure of personal data

We may use your personal data to:

- Contact you about a career opportunity that we believe might be of interest to you;
- Consider your candidacy or process a career-related application;
- Seek your insight on an executive or board search engagement that we're leading;
- Update you on our client work; and
- Update you on our firm.

Our work – connecting unique leaders with high-performing corporate and social sector organizations seeking to fill executive and board positions – inherently involves sharing your personal data with our clients for whom we are leading searches (and our or our clients' business partners working actively on those searches). That said, we take measures to ensure that such disclosure is reasonable and appropriate; for example, we only share your resume when you have shared it with us, and when you have been informed we will be sharing it with a client related to a specific executive search, and we do not sell or rent your personal data.

We also share personal data we collect with service providers, including several cloud-based information service providers (who may include, for example, Dropbox for Business and Salesforce) whose products we use to store, manage, and access personal data and other business information. However, we typically do not engage service providers, suppliers, or subcontractors to perform services requiring them to access or use your personal data. If providing service providers with access to your personal data, we will make reasonable efforts to ensure that they are subject to confidentiality and security obligations with respect to such personal data.

We may also disclose your personal data (i) to a buyer or other successor in the event of a merger, sale, or other transfer of some or all of the assets of Viewcrest Advisors, Ltd., (ii) to comply with any court order, law, or legal process, including to respond to any subpoena or governmental or regulatory request, (iii) if we believe disclosure is necessary or appropriate to protect the safety, rights, or property of Viewcrest Advisors, Ltd. or others, or (iv) for any other purpose disclosed by us when you provide the information or to which you have consented.

## III. Safeguarding personal data

We use reasonable efforts to secure your personal data against accidental loss, destruction, and damage and unauthorized access, use, alteration, and disclosure. Although we regularly assess the sufficiency of the safeguards we employ, we cannot guarantee the security of your personal data, and any transmission of information by you to us is at your own risk.

## IV. Retention of personal data

We make efforts to avoid retaining your personal data for an unreasonably long time, taking into account the amount, nature, and sensitivity of such personal data (including whether it is publicly available), the purposes for which we collected it, and the degree to which it remains relevant and useful.

Viewcrest Advisors, Ltd. is committed to building and maintaining deep relationships over time, and to connecting our contacts with each other and with new opportunities. As such, we may be in touch initially with you about a particular board or executive search engagement, and may seek to reconnect with you in the future about other career opportunities. Or we may interact with you initially as a potential candidate, and in the future as a client, a network source, or as a reference for another individual.

# VIEWCREST ADVISORS

## V. Contacting us regarding your personal data

You can contact us at any time at the email address listed at the end of this Privacy Policy to ask that we do any of the following:

- Erase or delete all or some of your personal data.
- Change, update, or correct your personal data.
- Restrict how we use all or some of your personal data.
- Provide you with a copy of your personal data.

We will consider and respond to any such requests promptly and otherwise in accordance with applicable laws.

## VI. Transferring Personal Data to the United States; Note for European Economic Area Residents

Viewcrest Advisors, Ltd. is located in the United States. Please be aware that any personal data we collect may be transferred to and processed in the United States and be subject to United States law. The privacy and data protection laws in the United States may not be equivalent to the laws in your country of residence.

While our focus is generally on the United States, insofar as we may from time to time process personal data of individuals in the European Union, Iceland, Liechtenstein, Norway, or the United Kingdom, which processing may be subject to the European Union's General Data Protection Regulation (GDPR), please note the following:

- We will only process your personal data to the extent applicable law allows us to do so.
- The United States has not sought nor received a finding of "adequacy" from the European Union under Article 45 of the GDPR. We rely on derogations for specific situations as set forth in Article 49 of the GDPR. In particular, we collect and transfer to the U.S. personal information only: with your consent; to perform a contract with you; or to fulfill a compelling legitimate interest of Viewcrest Advisors, Ltd. in a manner that does not outweigh your rights and freedoms.
- If you have any complaints regarding our privacy practices or how we handle any requests you make in accordance with Section V above (which requests you may have a legal right to make and we may have a legal obligation to honor, as dictated by applicable law), you may also lodge a complaint with your national data protection authority.

## VII. Updates to our Privacy Policy

Viewcrest Advisors, Ltd. retains the right to update this Privacy Policy at any time. If we do so, the updated Privacy Policy will be posted on our website. We will assume that any interaction we have with you as a potential candidate, client, network source or partner indicates your agreement with the terms of the Privacy Policy.

Any comments, concerns, questions or specific requests regarding this Privacy Policy should be directed to Viewcrest Advisors, Ltd.'s president and founder, Kathleen Yazbak. She is reachable at: [kathleen@viewcrestadvisors.com](mailto:kathleen@viewcrestadvisors.com)

This Privacy Policy was last updated on, and is effective as of, the date listed above.