

## Privacy Policy

Witt/Kieffer Inc. and its affiliates (collectively “Witt/Kieffer”, “us” or “we”) is a global firm providing executive search services and leadership solutions to organizations that improve the quality of life in the specialized practice areas of healthcare, life sciences, higher education, academic medicine and not-for-profit (the “Services”). Witt/Kieffer takes data privacy seriously and maintains this Privacy Policy so that actual and potential clients (“clients”), actual and potential candidates (“candidates”), participants in assessments provided as part of the Services, persons who provide any view or opinion regarding the qualities or abilities of any candidate or participant, for any purpose, including but not limited to the suitability of a candidate or participant for a particular role with a client (“sources”) and other users of this website or Witt/Kieffer Services understand how Witt/Kieffer collects, uses and discloses any personally identifiable information (“Personal Information”).

For the purposes of the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and any related and applicable legislation, Witt/Kieffer Inc. is the data controller for all Personal Information collected in accordance with this Privacy Policy and Witt/Kieffer International Limited is its representative for the purposes of the GDPR.

### Scope of Policy

Witt/Kieffer collects relevant Personal Information voluntarily provided by clients and potential clients, candidates and potential candidates, participants, sources and other users through this website [www.wittkieffer.com](http://www.wittkieffer.com) (the “Site”) or in the course of providing the Services. Witt/Kieffer is committed to protecting this Personal Information consistent with applicable privacy laws and industry standards.

This Privacy Policy does not apply to any other websites that may be linked to or accessible from this Site. Please note that when you access any external links from the Site, the linked sites may be covered by separate privacy policies specific to those sites. We encourage you to access and review all applicable privacy policies.

We are not responsible for the privacy of any information you reveal or post in any public forum (e.g., message board, blog, personal page, etc.) or through any public feature available on or through our Site, or for the privacy practices of websites that are operated or owned by third parties.

### How We Collect Your Personal Information

Witt/Kieffer collects relevant Personal Information in the following ways:

- In the course of conducting recruiting assignments for clients, Witt/Kieffer may proactively contact candidates in its research and networking efforts.
- While providing leadership solutions to clients, Witt/Kieffer may receive Personal Information from its clients for the assessments or other services and from participants in the assessments or services.

- Clients may provide Personal Information of candidates, participants or sources to Witt/Kieffer.
- Witt/Kieffer may collect Personal Information from public sources (e.g., regulatory filings) or from licensed databases (e.g., professional platforms for hosting contact details of candidates, participants or sources).
- Candidates may send unsolicited resumes and CVs to Witt/Kieffer either directly or through this Site.
- Candidates and sources may update their Personal Information in order to keep the information current.
- During the process of reviewing a candidate's credentials and interviewing him or her in connection with a recruiting assignment, Witt/Kieffer may collect additional Personal Information to assist in the evaluation of the candidate against the requirements of the relevant position.
- In the course of general interaction with a client, Witt/Kieffer may collect the Personal Information of individual contacts within that client's organization.

### **Foreign Visitors To The Site**

Witt/Kieffer is a global organization and the Site is hosted on servers located in the United States. If you reside outside the United States, by using our Site or submitting your Personal Information you acknowledge that you are aware of the transfer of your Personal Information to the United States and to collection, use and disclosure of your Personal Information as described in this Privacy Policy.

### **What Personal Information Do We Collect?**

Witt/Kieffer collects and stores Personal Information about you when you provide it to us either online or offline. For example, when you voluntarily provide it we collect your name, business name, address, phone number, fax number, email address, etc. If you are a candidate or potential candidate and submit a resume or other biographical summary, we also collect information related to your employment history, professional experience, education, professional certifications, professional memberships, citizenship, etc. If you are a client or potential client, we may also collect information regarding the job title or position description, contact details, etc. We may also collect Personal Information about you from sources who, for example, recommend you for active executive searches; or public sites or databases or social media sites. If your photo is accessed from a licensed database public site, we will use it for internal communications only and will not provide it to our clients or any other persons outside Witt/Kieffer, provided that if you provide your photo to a subscription site to which Witt/Kieffer subscribes, such as LinkedIn, and you are a candidate for a client search, Witt/Kieffer may provide your photo to its client in connection with the search. If you voluntarily provide information regarding another person in connection with Witt/Kieffer's

provision of the Services, you represent that you have the authority to provide the information to us and to permit us to use the information in accordance with this Privacy Policy.

### **Sensitive Personal Information**

Do not provide us with any sensitive Personal Information relating to your social security number or other governmental identification, pay card or account, racial or ethnic origin, age, political affiliation or activities, religious or other beliefs, health or medical condition, union affiliation or activity, genetic or biometric data, sex life, sexual orientation or criminal background unless legally required for a particular job position. Note that, if processing of sensitive Personal Information is necessary for the purposes of carrying out the obligations and exercising specific rights of Witt/Kieffer or of you in the field of your employment, we will collect such information only on a voluntary basis. If you choose not to provide sensitive Personal Information in this circumstance, please understand that you may not be included in any Services provided by Witt/Kieffer which require such information.

Information also is collected from visitors to the Site in the following areas:

### **Registration**

When you visit certain areas of the Site, we may ask you to register or to provide some Personal Information and demographic information such as contact information and preferences before accessing certain content on the Site. You may visit our Site without registering, but you may not be able to access certain areas of the Site or Services.

### **Surveys**

At times, you may be asked to complete survey questions that appear on the Site.

### **Candidate Applications**

You may submit Personal Information related to job opportunities we post.

### **Discussion Forums**

You may have opportunities on the Site to participate in or post content to message boards, chat rooms, comment boxes and/or news groups that may be available from time to time to users of the Site. Please remember that any information you disclose in such areas becomes public information. You always should exercise caution when deciding to disclose your Personal Information.

### **Email**

You may have opportunities on the Site to communicate with us by email. You may also choose to provide your email address to receive communications from us or from third parties.

## Updating Personal Information

We use our best efforts to keep your Personal Information updated based on information you provide to us. If you would like to correct, modify or update your Personal Information, please send your modified or updated Personal Information to [privacy@wittkiewfer.com](mailto:privacy@wittkiewfer.com).

## Rights

Under certain applicable laws, you may have the following exercisable rights regarding how we process your Personal Information:

- Request access to any Personal Information about you held by us.
- Know why your Personal Information is being processed.
- Have your Personal Information deleted.
- Object to the processing of your Personal Information, including but not limited that being processed for direct-marketing purposes or profiling.
- Ask to have inaccurate Personal Information held about you amended (as noted above).
- Request certain Personal Information is restricted from processing where there is a question as to its accuracy, the processing is unlawful, there is no need to process the Personal Information or there is an objection to Personal Information and the decision is pending.
- Request certain Personal Information is transferred to a third party.
- Withdraw consent to the Personal Information being processed (where consent is actually relied upon).
- Object to any decision that significantly affects them being taken solely by an automated process.
- Complain to the supervisory authority, being the Information Commissioner's Office in the United Kingdom.

If you wish to find out whether any of these rights apply to you or if you wish to exercise any of these rights, please send an email to our Data Privacy Officer at [privacy@wittkiewfer.com](mailto:privacy@wittkiewfer.com) expressly stating so.

## Retention

Personal Information of clients, candidates, participants, sources and other users of the Site will be retained for as long as they maintain an active relationship with Witt/Kieffer, plus any applicable limitations period or period of contractual obligations.

### **Information Collected and Stored Automatically**

When you browse and navigate through our Site, certain information may be passively collected (that is, gathered without you actively providing the information) using various technologies and means. Like most web site operators, we track IP addresses (the Internet address of your computer), the web pages visited and the time of visits, and other clickstream data. We gather data such as the type of computer, operating system and browser you are using, which we may use to improve the performance of our Site.

We may also place small data files, called “cookies,” in the browser file of your computer’s hard drive. These cookies automatically identify your browser to our server whenever you interact with the Site. We use the cookies to record Site statistics. Most browsers automatically accept the cookies, but you usually can change your browser setting to prevent the acceptance of cookies. Certain web pages may not function properly if you choose not to accept cookies.

### **Why We Collect Your Personal Information**

Witt/Kieffer collects and processes relevant Personal Information when it is necessary for: (i) compliance with a legal obligation to which we are subject; or (ii) our legitimate interests, further details of which are below.

We use your Personal Information to communicate with you when necessary in connection with your use of the Site and in support of and performance of the Services, to respond to your questions, or to send you material and information you request. We may collect, track and/or use your information to:

- Personalize your site experience and to allow us to deliver the type of content and product information in which you are most interested.

- Consider your suggestions.

- Respond directly to you for clarification.

- Process your request for information if you make one, as appropriate.

- Respond to your questions if you ask them.

- Provide you with information regarding upcoming events, new services and general information about our firm, products, services and thought leadership communications (for more information, see the Marketing section below).

We may use your web site information to help us diagnose problems with our Site. We may use all information we collect to analyze statistical use patterns and demographic data (basically, where our visitors come from and what demographic characteristics they have) and to improve our Site to better serve our clients and candidates. We use your IP address to help diagnose problems with our servers, and to administer our Site.

Your IP address is used to help identify you and to gather broad demographic information. We may also prepare and keep statistical records and other data about you and other users of our Site, but we do that in a way that anonymizes and de-identifies you and any other user. We may hire third parties to help us collect and analyze such anonymized data, and we may share such statistical data with third parties. We use this information to help us make our Site more useful to visitors — to learn about the number of visitors to our Site, what part of the Site they are interested in, how long they use the Site, and the types of technology our visitors use.

**Anonymized or de-identified information is not considered Personal Information; Witt/Kieffer does not consider or treat anonymized information as Personal Information under this Privacy Policy.**

## **Marketing**

If required by applicable law, you have the choice whether or not you receive information such as marketing from us, and if you indicate clearly that you are interested in receiving regular information about Witt/Kieffer's activities including upcoming events, new services and general information about our firm, products, services and thought leadership communications, we will send you communications either electronically or by post. In addition, we may send you direct mail that we feel may be of interest to you.

We will not contact you for marketing purposes unless you have given your prior consent. If, at any time, you no longer wish to receive this information, please send a request to our Data Privacy Officer at [privacy@wittkieffer.com](mailto:privacy@wittkieffer.com), or click the unsubscribe link at the bottom of the email.

## **Data Storage**

### **Disclosing Your Personal Information To Others**

Except in the limited circumstances stated in this section, we do not sell, rent, license, trade or otherwise disclose your Personal Information to unaffiliated third parties.

We may disclose your Personal Information to clients in the context of providing the Services, service providers who assist us in operating the Site or conducting our business, our affiliated Witt/Kieffer entities as necessary to perform and in the context of the Services, Witt/Kieffer employees who have a legitimate business reason to process the Personal Information and who receive appropriate and regularly updated training in data protection compliance and third party processors who process Personal Information on Witt/Kieffer's behalf subject to contracts which require compliance with applicable privacy laws. We may disclose your Personal Information when we believe it is necessary to comply with any law, rule, court order, or subpoena, to enforce our legal rights or any Terms and Conditions for Website Use, to protect our business, property and operations, in connection with a sale, acquisition, merger, liquidation, dissolution, or other business combination, reorganization or assignment of any part of our business to a third party, or in situations involving threats to the physical safety of any person.

Given the global nature of Witt/Kieffer, such entities may be located in the United States, the United Kingdom, the European Economic Area or elsewhere. For information on how we keep your Personal Information safe, please see the 'Security' section below.

**THIS PRIVACY POLICY DOES NOT PROTECT YOU WHEN YOU PROVIDE INFORMATION (INCLUDING PERSONAL INFORMATION) ABOUT YOURSELF THROUGH ANY COMMUNITY AREA AVAILABLE ON OUR SITE.** You should be aware that any information shared in a public forum such as a message board, blog, personal page, posting, group, bulletin board is public information and may be seen or collected by third parties that do not adhere to our Privacy Policy, although the availability of personal pages or groups identified as "private" may be limited to certain permitted users. You should think carefully before disclosing any information in any public forum, on or through our Site.

### **Comply With The Law**

We will share information about you, including Personal Information, if applicable laws require it.

### **Respond To Lawsuits And Legal Actions**

We will share information about you, including Personal Information, in response to a court or administrative order, or in response to a legal subpoena.

### **Links To Other Sites**

We may create or provide links to other websites that we believe may interest you. These links are provided solely as a convenience to visitors to the Site and should in no way be construed as a representation that Witt/Kieffer has an affiliation with such sites. We do not endorse or review any of the content, items or services on any other websites, and our Privacy Policy applies only to your use of our Site. You access and use such other sites, including the content, items and services on those sites, solely at your own risk. These linked sites may collect Personal Information from you. Witt/Kieffer has no control over and is not responsible for these other sites, their collection of your Personal Information or their privacy policies. We have not reviewed the privacy policies of any websites we link to our Site, and you should read the privacy policies of each site you visit to determine what information that site may collect about you. If you would like information regarding any other party's privacy policy, you should contact that party directly. Witt/Kieffer makes no representations or warranties with respect to the content, ownership or legal status of any such linked site. You acknowledge and agree that Witt/Kieffer has no responsibility or liability for linking such external sites, or for the content, advertising, products or other materials available through such linked sites.

## **Social Media Sites**

Our Site may contain links to third party social media sites, such as LinkedIn, Twitter, or other sites. The operators of such social media sites may collect your Personal Information and use and disclose such information in accordance with their own privacy policies. For each such site, you should check with the site operator regarding its own policies regarding the collection, use and disclosure of your Personal Information.

## **Security**

We have put in place reasonable physical, electronic, and managerial procedures to attempt to safeguard and help prevent unauthorized access, maintain data security, and correctly use the information we collect on the Site. In addition, we require third party contractors with whom we share information to maintain reasonable security and confidentiality policies and practices and to use any Personal Information disclosed to them only in accordance with our express instructions limiting use. In addition, to the extent that we disclose your Personal Information to clients in connection with providing the Services we request that they properly protect such information consistent with the security and confidentiality requirements of applicable law. We regularly review the risks posed to Personal Information by our processing activities.

However, please remember that no transmission of data over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we have taken appropriate technical and organizational steps to protect your Personal Information, we do not ensure or warrant the security of any information that you transmit to us or receive from us, and you do so at your own risk. Witt/Kieffer has and accepts no liability for disclosure of information obtained due to errors in transmissions or the unauthorized intervention of third parties.

The safety and security of your information also depends on you. Any Personal Information or sensitive data that you disclose through any discussion boards or other public online forums hosted on this Site may be collected and used by others. We recommend caution when giving out Personal Information to others in public online forums. When you provide information on these forums, you do so at your own risk. The information you share may be viewed by any other user of this Site.

## **Children Visiting The Site**

This Site is not intended for children under the age of 13. We will not knowingly collect personally identifiable information from site visitors in this age group. We encourage parents to talk to their children about their use of the Internet and the information they disclose online. Subject to applicable laws, if a child has provided us with Personal Information, a parent or guardian of that child may contact us via email at the below email address if they would like this information deleted from our records. We will use reasonable efforts to delete the child's information from our online and offline records.

## **Questions About Our Privacy Policy**

If you have questions about our Site or our Privacy Policy, please feel free to contact our Data Privacy Officer at [privacy@wittkieffer.com](mailto:privacy@wittkieffer.com).

### **Effective Date**

This Privacy Policy is effective as of May 25, 2018. Witt/Kieffer reserves the right to amend, modify add to or remove portions of this Privacy Policy at any time at its sole discretion. The date of the revision/update will be noted on the Policy. Your activities on the Site or with Witt/Kieffer are covered by the version of this Policy posted at the time of the activity.

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