

PRIVACY POLICY

Spacelinks is a global recruitment firm. We help organizations select and hire the talent they need to execute their strategy.

Spacelinks offers services to help companies recruit new personnel and attract talent (“Recruitment Services”). We provide Recruitment Services to clients searching for talent at the board-level, chief executive, and other senior executive positions. We also help clients find talent for middle to upper level management.

Often, our client may be your employer or an organization with which you are seeking employment.

PERSONAL INFORMATION WE COLLECT

Spacelinks collects information that identifies you as an individual or relates to an identifiable individual (“Personal Information”) to provide Services to you, our clients and to operate our business. The type of Personal Information we collect about you depends on the situation at hand.

- We may collect your name, contact details and your preferred means of communication.
- In the course of our Recruitment Services, we may collect the following types of information about you as a potential candidate: name, address, telephone number, e-mail address, resume information (employment history, education, professional credentials, memberships in professional organizations, skills, etc.), citizenship, information from former employers and other references, and additional information to the extent we have acquired or you have provided us with such information. We also use photos of you that you provide to us or that you make publicly available on the Internet (e.g., LinkedIn). As permitted by applicable laws, we obtain background verification information.
- When you are utilizing our Online Systems (www.space-careers.com), we may collect login user credentials like user names and passwords.
- Where permitted by law, we may collect compensation and benefits information about you to consult with you or our clients on rewards and benefits.
- We encourage you not to provide any sensitive Personal Information to us, such as government identification numbers, payment card numbers, information related to racial or ethnic origin, political opinions, religious or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership.

Please do not provide us with any Personal Information if you do not agree with the above Policy.

HOW WE COLLECT PERSONAL INFORMATION

As you interact with Spacelinks, you provide some Personal Information directly.

- We may collect Personal Information when you register to use our Online Systems, submit or build a resume, respond to employment opportunities, complete online assessments or surveys, participate in online courseware, provide Personal Information about yourself to our coaches or contact us via e-mail, electronic forms, telephone or postal mail.

Personal Information about you may also come from our clients to whom we provide Services.

When providing our Recruitment Services we may also obtain Personal Information about you from referrals, networking activities, public databases, joint marketing partners, licensed databases, and social media platforms. The information we collect from these third parties includes information about the identity of potential candidates (e.g., an individual's name, address, telephone number, e-mail address), information about their background and qualifications (employment history, education, professional credentials, memberships in professional organizations, skills, etc.), citizenship, information from former employers and other references. We also use photos of you that you provide to us or that you make publicly available on the Internet (e.g., LinkedIn). As permitted by applicable laws, we obtain background verification information.

HOW WE USE THE PERSONAL INFORMATION WE COLLECT

Spacelinks uses the Personal Information it collects in several ways. The summary below provides additional details about the ways we use the Personal Information we collect.

We use your Personal Information to provide our Services.

We use Personal Information to render Services to you and our clients. We do this to fulfill our contractual relationships with you and our clients and where we have a legitimate, beneficial interest in using Personal Information to conduct our business.

In the course of our Recruitment Services, we may use Personal Information that we have collected to create a profile about you. This profile may be used to identify professional opportunities that we think may be of interest to you.

You can always object to our creating a profile about you, see the 'Choices and Access' section below on how you can object.

- If you object, we will remove your profile from our database, but this will also mean that you will not be considered for opportunities in the future.

In the course of our Recruitment Services, we also use your Personal Information to confirm references and conduct education and background checks as appropriate.

We use your Personal Information to respond to your inquiries, to verify your information, or to share information with you.

- We use your Personal Information to respond to your inquiries and fulfill your requests. If you contact us, we keep a record of your contact information and correspondence, and we use information you provide in your message to respond to your inquiry. We do so to manage our contractual relationship with you.

From time to time we use your Personal Information to send you important information regarding the Online Systems, changes to our terms, conditions, policies, and other administrative information.

We may also contact you to verify that the Personal Information we collected about you is accurate and current.

We use your Personal Information to operate our business.

We use your Personal Information for our business purposes, such as audits, internal communication regarding candidates and clients, determining the effectiveness of our promotional activities, administering our Services, maintaining and securing our infrastructure, and for procurement and financial transactions.

We use this Personal Information to manage our contractual relationship with you and our clients, to comply with a legal obligation, and because we have a legitimate beneficial business interest.

Spacelinks occasionally sends informational e-mails, articles, and information regarding our Services. We may use your Personal Information to send you information or marketing materials.

We may also desire to use your Personal Information in press releases and direct marketing materials. Before we use your Personal Information in that way, we will obtain consent from you.

WHO HAS ACCESS TO YOUR PERSONAL INFORMATION

How your Personal Information is disclosed will depend upon the situation.

We use your Personal Information to provide our Services.

While providing our Services, we may disclose your Personal Information to clients who have engaged our services.

- In the course of our Recruitment Services, we disclose Personal Information regarding candidates, including the results of assessments and related data, to

prospective employers that have engaged Spacelinks to fulfill recruitment requests, or to reference sources.

Spacelinks discloses Personal Information to third parties who provide support for our Services or business operation.

- Spacelinks works with third parties who provide services that may include, but are not limited to, assessment services, including assessment validation services, website hosting and IT consulting services, data analysis, resume verification, background checking, payroll services, public relations services, marketing services, attorneys, accountants, and other administrative and back-up and security services.
- As part of providing services, these third parties will be provided with access to Personal Information. In addition, our software development partners may use Personal Information to modify, improve, refine, and validate their technology, research and development.

Spacelinks may disclose or transfer all or part of your Personal Information in the event of a sale of our company. We may also disclose or transfer all or part of your Personal Information in the event of a merger or consolidation involving our company. This may also occur if there is a sale or transfer of assets or of any portion of our business.

There may be other times that we disclose your Personal Information.

- Spacelinks may also use or disclose Personal Information (to comply with a legal obligation or because we have legitimate interest to do so) in order to: (i) comply with applicable laws, (ii) respond to inquiries, requests or orders from public or government authorities, including those outside of your country of residence, or (iii) protect the rights, privacy, safety or property, of Spacelinks and our affiliates, you or others.
- We cannot and do not assume any responsibility for the actions or omissions of third parties, such as clients, including the way they use Personal Information received either from Spacelinks or from other independent sources.

By using our Online Systems and Services, you understand that your Personal Information may be transferred to countries outside of your country of residence, which may have different data protection rules than your country.

OTHER INFORMATION WE COLLECT

Spacelinks collects other information that does not reveal your specific identity (“Other Information”), such as:

- Information collected through cookies, pixel tags, and other technologies,
- App usage data,
- Demographic information and other information provided by you, and
- Aggregated information.

Because Other Information does not reveal your specific identity, we may use it for any purpose.

If we are required to treat Other Information as Personal Information under applicable law, we may use and disclose it for the purposes for which we use and disclose your Personal Information as detailed in this Policy.

We use “cookies” (small text files placed on a visitor’s computer hard drive) and other similar technologies to help us determine information like the type of content a visitor to the Site consumes, and the length of time each visitor spends at any area of the Site. Cookies and similar technologies enhance your experience on the Site.

You can configure your browser settings to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie(s) from a particular site. Please click [here](#) for information on how to manage cookies stored on your computer. If you disable cookies and similar technologies, your experience on the Site may be diminished and some features may not work as intended.

CHOICE AND ACCESS

Your provision of Personal Information to us is voluntary, although if you do not provide certain Personal Information you may not be able to participate in our Services.

Contact us at info@spacelinks.com if you would like to:

- ask questions about how we handle your Personal Information,
- withdraw your consent to our use of your Personal Information,
- object to our use of your Personal Information for our legitimate business interests, or
- request to review, correct, update, suppress or restrict the use of your Personal Information,
- To review, correct, update, suppress or restrict the use of your Personal Information, please include all relevant User IDs and e-mail addresses.
- Although we strive to maintain accurate Personal Information, if it is determined the Personal Information is not accurate, we will work quickly to correct it.

Request that your Personal Information be removed from Spacelinks’s databases,

- To remove your Personal Information from Spacelinks’s databases, please include all relevant User IDs and e-mail addresses.
- Spacelinks will make reasonable attempts to delete Personal Information upon your request.

- Please note that to maintain consistency in our Services and operations, we retain backup systems. When you ask that your information be removed from Spacelinks's databases, we may not be able to delete residual copies from our systems or from our backup systems, but they will continue to be protected as required under this Policy.

If you would like to opt-out of receiving marketing communications from us, please contact us at info@spacelinks.com to have your contact information removed from our marketing databases.

- If you request to have your information removed from our marketing databases through an email request, please include "Remove User" in the subject line of the e-mail, and include your full name, User ID, and telephone number in the body of the e-mail message.
- You can also forward a copy of the e-mail or marketing communications from which you want to opt-out.
- Please note that when we perform Services at the specific request of our client, your request may need to be directed to that client. We may only be able to provide you with a non-confidential summary of our final assessment report because these reports contain confidential client personal information that we are not allowed to disclose.
- For your protection, we may only implement requests with respect to the Personal Information associated with the email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will comply with your request as soon as reasonably practical and may need to contact you to be sure that we understand your request.
- We also may need to retain certain Personal Information about you such as your e-mail address to honor opt-out or similar requests. Please keep in mind that this residual Personal Information will remain within Spacelinks databases, access logs, and other records, which may or may not contain identifiable Personal Information about you. The residual Personal Information will not be used for commercial purposes. However, Spacelinks reserves the right, from time to time, to recontact former users of its Services as appropriate.

SECURITY

Spacelinks has reasonable organizational, technical, and administrative measures in place to protect against the loss, misuse, and alteration of Personal Information about users of the Online Systems which is under our control. Unfortunately, however, no security system, or system of transmitting information over the Internet can be guaranteed to be 100% secure.

- If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised or your user credentials are no longer secure), please immediately notify us of the problem at info@spacelinks.com.

RETENTION PERIOD

We retain your Personal Information for as long as needed or permitted considering the purpose(s) for which it was obtained.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you or our client (e.g., for as long as you have an account with us or keep using the Services),
- A period beyond the time of the ongoing relationship if we have a legitimate internal operations need, such as a need to retain such information for analysis, record-keeping and compliance with data retention schedules, or
- Whether retention is advisable considering our legal position (such as regarding applicable statutes of limitations, litigation or regulatory investigations).

LINKS TO OTHER WEBSITES

This Policy does not address, and we are not responsible for, the privacy, information, or other practices of any other third parties.

- On the Online Systems, you may have the opportunity to follow a link from or to other third parties. The inclusion of a link on our Online Systems does not imply our endorsement of the linked site. Because these other websites may not be hosted or controlled by Spacelinks, this Policy does not address the privacy practices of those websites. We encourage you to review the privacy policies of each of those websites.
- Please note that we are not responsible for the collection, usage, and disclosure policies and practices (including the data security practices) of other organizations, such as LinkedIn, Facebook, Apple, Google, Microsoft or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.

QUESTIONS

Spacelinks is responsible for collection, use, and disclosure of your Personal Information under this Policy.

Questions regarding this Policy should be directed to Spacelinks at info@spacelinks.com or, if by postal mail, at Spacelinks, 51 rue de Sécary, 33260 La Teste de Buch (France).