

At BHBC, we take the issue of Privacy very seriously. We are committed to protecting Personal Information and providing a safe and secure service for all individuals and client organizations. 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 the transfer of information collected by us. This includes how we look after your personal data when you visit our website at [Berenice-hillionbourbon.com](http://Berenice-hillionbourbon.com) (Website) and when you use our leadership advisory services (the Services).

We are an independent leadership advisory firm registered in France, with SIREN company number 981592587 as Berenice Hillion-Bourbon Consulting (trading name, BHBC).

We collect 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. This includes:

- Contact Data – name, email address, telephone numbers, first language;
- Communication Data – correspondence between you and us;
- Feedback – information and responses you provide when completing surveys and questionnaires;
- Psychometric Questionnaire Data – psychometric questionnaire answers and output reports;
- Employment Data – job title, education, work history and experiences, reference and 360 feedback data;
- Health Data – information you share with us about health for accessibility purposes, or absences from work or mental health status.
- Demographic Data – date of birth, gender, age, ethnic origin. Such data is used only for the purposes of statistical analysis to help us to monitor and improve fairness and inclusivity, is completely voluntary and does not form part of any assessment.
- 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.

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

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

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

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.

We use 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 us to fulfil our contractual obligations to you or to our client organization, where you may be a current or prospective employee of that client.
- Fulfilling your requests: to answer any questions you may have about 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 advisory. The end product will be aggregated and anonymized 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 Services for our clients.
- Third Parties: We use third parties, who comply with similar undertakings of privacy and confidentiality on our behalf and who also provide services to us. These organizations include:
  - Technology operations companies for IT support.
  - Psychometric Assessment Suppliers.
  - Professional advisors: such as our accountants or legal advisers.
  - Independent consultants and operational support staff.
- 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 reason not listed above, we will seek your explicit consent to collect, hold, use and disclose your Personal Information.

If we were asked to provide personal data in response to a court order or legal request, we would seek legal advice before disclosing any information and consider the impact on your rights when providing a response.

As defined under GDPR, Berenice-Hillion Bourbon 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 we provide a leadership advisory 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 our 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 consultant. We will also ask you to complete psychometric profiling tests. Your 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 / 360 feedback data will be integrated into the assessment report. 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.

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 three-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.

We are a French organization, with staff in France. 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.

Under data protection law, you have rights, including the right to access copies of your personal information, to rectify inaccurate information or to ask us to transfer your data to another organisation, or to you, in certain circumstances.

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 us to stop using your information. Our policy is to make every effort to satisfy the requests of data subjects relating to access requests and data deletions. After your engagement with us, 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.

Our Website uses cookies to ensure it works as intended. However, none of these cookies are storing any sensitive visitor data such as IP addresses, locations or personal information.

This Fair Processing Notice will be updated regularly to reflect any changes in the way we handle your personal data or any changes in applicable law. Updates will be made on our website. Continued use of the Website or our Services will constitute acceptance of such changes.

If, at any time, you have questions or concerns about our online privacy commitment, please feel free to e-mail us at [contact@berenice-hillionbourbon.com](mailto:contact@berenice-hillionbourbon.com) or by writing to us at:

Berenice Hillion-Bourbon

BHBC

72 Boulevard Clamour. 83000 Toulon. FRANCE

If you have any concerns about our use of your personal information, you can make a complaint to us at [contact@berenice-hillionbourbon.com](mailto:contact@berenice-hillionbourbon.com)

You can also complain to the CNIL (Commission Nationale de l'Informatique et des Libertés) if you are unhappy with how we have used your data.

The CNIL's address:

Commission nationale de l'informatique et des libertés

3 Place de Fontenoy

75007 PARIS

France

Helpline number: +33 (0)1 53 73 22 22

CNIL website: <https://www.cnil.fr/en>

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