

Privacy Policy

Last Updated: April 2025

1. Introduction

Talents Boutique LLP (“**we**”, “**us**” or “**the Company**”) is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information when you use our website (<https://www.talentsboutique.com/>) or otherwise interact with us. It also outlines your rights under the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018. By using our website or services, you agree to the collection and use of information in accordance with this policy.

2. Who We Are

Talents Boutique LLP is a limited liability partnership registered in England and Wales. We provide international recruitment services for e-commerce businesses worldwide. For the purposes of data protection law, Talents Boutique LLP is the “data controller” of your personal information. You can find our contact details in the “Contact Us” section of this policy.

3. Information We Collect

We may collect and process the following personal data (information that can identify you as an individual):

- **Contact Information:** When you contact us via our website contact form, by email, or through messaging apps (e.g. WhatsApp, Telegram), we collect data such as your name, email address, phone number (if provided), and any other contact details you provide.
- **Inquiry Details:** Any information you choose to share in your message or inquiry, such as your company name, role, the nature of your request, or details about a job vacancy or your CV if you are a candidate.
- **Schedule Information:** If you book a consultation or meeting (for example, via an integrated calendar or a link to Zoom/Google Meet), we may collect your name, contact details, and scheduling information (meeting date/time and any notes) to arrange the meeting.
- **Candidate Information:** If you are a job seeker and send us your CV/resume or application (e.g. via email or an application form), we will collect the personal information included in your CV and correspondence. This may include your employment history, education, skills, qualifications, and any other details you provide that are relevant to job placement.
- **Website Usage Data:** When you visit our website, we automatically collect certain technical information through cookies and similar technologies (see our Cookie Policy). This can include your IP address, browser type, device information, pages viewed, and how you interact with our site. This information is generally aggregated and does not directly identify you, but if it can be linked to you it will be treated as personal data.

We do **not** collect any sensitive personal data (such as racial or ethnic origin, political opinions, health information, etc.) through the website. We ask that you do not send us such sensitive data

unless necessary for recruitment purposes and you have consented, in which case we will handle it with extra care and security.

4. How We Use Your Information

We use personal information for the following purposes:

- **Providing Services and Responding to Inquiries:** We use contact details and inquiry information to respond to your requests, such as answering questions about our services, consulting with you about your hiring needs, or assisting you if you are a candidate seeking a job. This may include contacting you via email, phone, or messenger to follow up.
- **Recruitment Services:** If you are a **client (employer)**, we use the information you provide to assist in finding suitable candidates for your company. If you are a **candidate**, we use your information (e.g. CV, skills, experience) to match you with job opportunities. We may contact you about roles that fit your profile and keep your details on file for current and future vacancies (with your consent where required).
- **Sharing with Potential Employers (Candidates only):** As a recruitment agency, we may share candidates' relevant personal information with our client companies who are seeking to hire, **but only** for recruitment purposes and typically with the candidate's knowledge or consent. (For example, if you apply or agree to be considered for a specific job, we will forward your CV or profile to the interested employer.) We do **not** sell or share your data with any third parties for their own marketing or other purposes.
- **Marketing and Newsletters:** With your consent, or where we have another lawful basis (such as a legitimate interest in the case of business-to-business contacts), we may use your contact information to send you newsletters, industry updates, or marketing communications about our recruitment services. You can opt out of such emails at any time (see "Your Rights" below).
- **Website Improvement and Analytics:** We use website usage data to analyze how our site is used, to troubleshoot performance issues, and to improve user experience. For example, we might use Google Analytics to see which pages are most visited. This helps us refine our content and services. (Any analytics we perform is on aggregated data and does not identify you personally. We obtain consent for analytics cookies via our Cookie Notice.)
- **Legal Obligations and Protection:** We may process personal data to comply with legal or regulatory requirements applicable to our business (for example, maintaining proper business records or verifying your identity to prevent fraud). In the context of recruitment, UK employment agency regulations may require us to retain certain records (e.g. work-seeker information for at least one year). We may also process data as necessary to establish, exercise, or defend our legal rights or to protect against legal claims.
- **Service Providers:** We use certain third-party service providers to help run our business (for example, our website hosting platform, email service, or scheduling tool). Personal data may be processed by these providers solely on our behalf and under our instructions, for the purposes listed above. We ensure such providers are bound by data protection obligations and do not use your data for their own purposes.

We will only use your personal information for the purposes it was collected for, or for related purposes that are reasonably compatible with the original reason. If we need to use your data for an unrelated purpose, we will notify you and, if legally required, ask for your consent.

5. Legal Bases for Processing

We process personal data under the legal bases allowed by the UK GDPR:

- **Performance of a Contract or Request:** Many times, our processing is necessary to take steps at your request or to fulfill a contract with you. For example, when you ask us to provide recruitment services or information, we must use your contact details and relevant information to deliver on that request.
- **Consent:** We rely on your consent for certain types of processing. For instance, we will obtain your consent before using your personal data for marketing emails. If you are a candidate, we may ask for your consent to hold your CV for future opportunities or to share your details with a particular employer. You have the right to withdraw your consent at any time.
- **Legitimate Interests:** We may process your data when it is in our legitimate interests to do so, and those interests are not overridden by your data-protection rights. Our legitimate interests include providing and improving our services, communicating with clients and candidates, and securing our website and business. For example, using basic contact information to follow up on a service inquiry, or using analytics to improve our site, may be considered our legitimate interests. When we rely on this basis, we ensure that we consider and balance any potential impact on you and your rights.
- **Legal Obligation:** In some cases, we have a legal obligation to process or retain personal data (for example, retaining certain records for tax, accounting, or compliance with employment/recruitment regulations).

6. Cookies and Tracking Technologies

Our website uses cookies and similar technologies to distinguish you from other users and to improve your experience (see our **Cookie Policy** for full details). When you first visit our site, we will notify you about our use of cookies through a cookie consent banner. We only use non-essential cookies (such as analytics cookies) with your consent.

Cookies are small text files placed on your device. The cookies on our site may collect information about your browsing actions and patterns. For instance, we might use Google Analytics cookies to collect information about how visitors use our site (e.g. which pages are visited, for how long) so we can improve the content. These analytics cookies do not reveal your identity to us; they just provide aggregated usage statistics. We may also use essential cookies that are necessary for the site to function (which do not require consent), for example to remember your cookie preferences or to enable core features.

For detailed information on the cookies we use and the purposes, please read our Cookie Policy. That policy also explains how you can manage or disable cookies via your browser settings. By adjusting your cookie preferences, you can control the collection of data through cookies.

7. How We Share Your Information

We treat your personal information with care and confidentiality. **We do not sell your data** to third parties. We only share personal data in the following circumstances:

- **Within Talents Boutique LLP:** Your information may be shared internally among our team members who need it to perform their duties (for example, recruiters handling your inquiry or consultants providing service). All staff are bound to keep information confidential.
- **With Client Companies (for Recruitment Purposes):** If you are a job candidate, we may share your information with our client employers **only** as needed for recruitment. For example, with your agreement, we will share your CV, profile, or contact details with a potential employer who is interested in your candidacy for a job. We will not forward your personal details to any company without a valid reason relating to a job opportunity and, where practical, without informing you.
- **Service Providers and Processors:** We use trusted third parties to help operate our website and business (such as web hosting providers, email delivery services, customer relationship management or applicant tracking systems, and scheduling tools like Calendly or video conferencing platforms like Zoom/Google Meet for meetings). These third parties may process personal data on our behalf (for example, store website data or transmit communications). We only share data that is necessary for them to perform their services, and we ensure they protect your data and use it only for our specified purposes, in line with this policy.
- **Messaging Platforms:** If you reach out to us via third-party messaging services like WhatsApp or Telegram by clicking the links on our site, those communications are subject to the **terms and privacy policies of those services**. We do not control how those platforms handle your data. We will receive the information you send through those platforms (e.g. your phone number and message content) and will treat it in accordance with this Privacy Policy. We recommend you review WhatsApp or Telegram's privacy policies if you have concerns when using those services.
- **Legal and Safety Reasons:** We may disclose personal information to third parties if required to do so by law or in response to valid requests by public authorities (e.g., law enforcement or regulators). We may also share information if necessary to establish, exercise, or defend our legal rights, or to protect the rights, property, or safety of Talents Boutique LLP, our clients, candidates, or others. For instance, to enforce our agreements or to investigate potential wrongdoing (such as fraud or security incidents).
- **Business Transfers:** In the unlikely event that we undergo a business transition such as a merger, acquisition, or sale of assets, personal data held by Talents Boutique LLP may be transferred to the successor or new owner as part of that process. If that happens, we will ensure your data remains protected and give any affected individuals notice where required.

Aside from the situations above, **we will not share your personal information with third parties**. In particular, we do not share or exchange your details with third-party marketers or unrelated companies for their own use.

8. International Data Transfers

Talents Boutique LLP operates globally, and as such, your personal data may be transferred to or accessed by parties outside your country of residence. Notably, our company is based in the United Kingdom, and we serve clients and handle candidate data from various countries (including those in the European Economic Area (EEA), the United States, and elsewhere).

If you are located outside the UK, be aware that the data you provide will likely be transferred to the UK (where our main operations are) for processing. Additionally, our recruitment work may involve sharing candidate information with client companies in other countries. Some of these countries may not have data protection laws as strict as those in the UK or EU.

Whenever we transfer personal data across borders, we take steps to ensure appropriate safeguards are in place to protect your information in accordance with applicable data protection laws. For example, if we transfer data from the EEA or UK to a country not deemed to have adequate privacy laws, we may use standard contractual clauses approved by the European Commission/UK authorities, or rely on other valid transfer mechanisms or exemptions. Our goal is to ensure that your privacy rights continue to be protected, regardless of where your data is processed.

By providing your information or using our site, you understand that your data may be transferred to our partners or clients in different countries as needed for the purposes you submitted it (such as considering you for an international job opening). We will always handle your personal data securely and lawfully.

9. Data Retention

We will retain your personal data only for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

- **General Inquiries:** If you contact us with a question but do not become a client or candidate, we will retain your contact information and message for a reasonable period in order to follow up with you. Typically, we would not keep such inquiry data longer than 1–2 years if there is no further interaction, unless you consent to receive marketing updates (in which case we keep your details until you unsubscribe or ask us to delete them).
- **Clients:** If you engage our services as a client (employer), we will retain your business contact information and any related communications for the duration of our business relationship and thereafter as needed for record-keeping (for example, we may keep records of placements made or contracts for a number of years to comply with legal obligations or to have historical reference).
- **Candidates:** If you apply for a job or submit your CV to us, we may retain your personal details and CV in our talent database. This is so we can consider you for current and future job opportunities. We will periodically review candidate data and remove information that is out-of-date or if you have not been in contact with us for a long time. If you prefer that we do not keep your details for future opportunities, you can request deletion at any time (see “Your Rights” below). Otherwise, as a general guideline, we

may keep candidate records for at least one year from the date of last contact or as required by law, and potentially up to 2-3 years. We believe keeping in touch with candidates can be mutually beneficial for future placements, but we will respect your wishes regarding your data.

- **Legal Requirements:** In some cases we must keep data for fixed periods by law. For example, financial transaction records or invoices (which might include client contact info) must be kept for a minimum period for tax/audit purposes. Similarly, recruitment agencies in the UK are advised or required by regulation to keep certain records of work-seekers and placements for at least 1 year. We will not keep personal data longer than necessary, but be aware that even if you request deletion, we might retain minimal information if required (e.g. to note that we shouldn't contact you again or to comply with legal hold requirements).

When we have no ongoing legitimate need or legal obligation to process your personal data, we will either delete it or anonymize it. If deletion (or anonymization) is not immediately feasible (for example, because the data is stored in backup archives), we will securely store the data and isolate it from any further use until deletion is possible.

10. Your Rights

Under data protection laws, you have various rights regarding your personal data. We are committed to respecting these rights and have summarized them below:

- **Access:** You have the right to request a copy of the personal data we hold about you, and to obtain information about how we process it (commonly known as a "Subject Access Request").
- **Rectification:** If any of your personal information we have is inaccurate or incomplete, you have the right to have it corrected or updated.
- **Erasure:** You can ask us to delete or remove your personal data in certain circumstances, for example, if it is no longer necessary for the purposes we collected it or if you withdraw consent and we have no other legal basis to continue processing. This is often called the "right to be forgotten."
- **Restriction:** You have the right to ask us to suspend or restrict the processing of your personal data in certain scenarios – for instance, if you contest the accuracy of the data or object to us processing it, we may pause processing while we address your concern.
- **Objection:** You may object to our processing of your personal data where we are relying on a legitimate interest basis (or those of a third party) and you have grounds to believe your rights and interests outweigh our legitimate interests. You also have the absolute right to object to us using your personal data for direct marketing purposes; if you object, we will stop such use.
- **Data Portability:** For data that you have provided to us and which we process by automated means on the basis of consent or contract, you have the right to request that we provide it to you or directly transfer it to another service provider, where technically feasible, in a commonly used machine-readable format.
- **Withdraw Consent:** If we are processing any of your personal data based on your consent, you have the right to withdraw that consent at any time. For example, if you have signed up to receive our newsletter, you can opt out by clicking the "unsubscribe"

link in our emails or contacting us to be removed from our list. Withdrawal of consent will not affect the lawfulness of any processing we carried out before you withdrew, and it won't affect processing under other legal bases.

- **Non-discrimination:** You have the right not to be subjected to decisions based solely on automated processing (if any) that have legal or similarly significant effects on you, without human involvement. (Note: Talents Boutique LLP does not use automated decision-making or profiling in a way that produces legal effects on individuals – any recruitment decisions involve human recruiters.)
- **Complaint:** If you have concerns about how we handle your data, you have the right to lodge a complaint with a supervisory authority. As a UK company, our supervisory authority is the **UK Information Commissioner's Office (ICO)**. You can contact the ICO or see their website for how to report a concern. If you are in the EU, you may contact your local data protection authority. We encourage you to contact us first, so we have the opportunity to address your concerns directly.

To exercise any of your rights, please contact us using the details in the Contact section below. We will respond to your request in accordance with applicable law, typically within one month. Please note there are some exceptions and limitations to these rights; if any apply, we will explain this to you in our response (for example, we might not be able to delete data that we are required to keep by law).

11. Security of Your Data

We take appropriate technical and organizational measures to secure personal data and protect it against unauthorized access, alteration, disclosure, or destruction. These measures include using secure servers, encryption where appropriate, firewalls, regular security monitoring, and limiting access to personal data to those in our team who need it for their job duties. We also ensure that any third-party processors handling data on our behalf implement adequate security measures.

However, please note that no method of transmission over the Internet or electronic storage is completely secure. While we strive to protect your personal information, we cannot guarantee its absolute security. We ask that you also take precautions when sending information to us – for instance, do not include sensitive personal details in an unprotected email.

If we become aware of a data breach that affects your personal data, we will notify you and the relevant authorities as required by law.

12. Third-Party Websites

Our website may contain links to third-party websites or services (for example, our social media pages, external resources in our blog, or the scheduling page on Calendly). If you follow a link to any external site, please note those sites have their own privacy policies and we do not accept any responsibility or liability for their content or practices. This Privacy Policy applies only to Talents Boutique LLP's website and services. We encourage you to review the privacy policies of any third-party sites or services before providing your information to them.

13. Children's Privacy

Our services are not directed to individuals under the age of 16. We do not knowingly collect

personal information from children. If you are under 16, please do not use our website or provide any personal data to us. If we learn we have collected or received personal data from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a minor, please contact us so we can address it.

14. Updates to This Privacy Policy

We may update or revise this Privacy Policy from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons. When we make changes, we will update the “Last Updated” date at the top of this policy. For significant changes, we may also provide a more prominent notice (such as a notification on our website or sending an email update if appropriate). We encourage you to review this page periodically to stay informed about how we are protecting your information.

Your continued use of our website or services after any changes to this Privacy Policy constitutes your acceptance of the updated terms, to the extent permitted by law.

15. Contact Us

If you have any questions about this Privacy Policy or our data practices, or if you wish to exercise your rights, please contact us:

- **Talents Boutique LLP**
Registered Office: 411 Oxford Street, Office 1.01, London, W1C 2PE, United Kingdom.
- **Email:** info@talentsboutique.com

We will be happy to assist you with any questions or concerns.

Thank you for reading our Privacy Policy. We value your trust and will continue working hard to keep your personal information secure.