

Individual	Personal Data	Source and Purpose	Lawful Basis for Processing
Candidates	<p>CVs, identification documents, educational records, work history, salary information, employment record and references, employment and education verification checks, correspondence and other personal data provided by you as part of the recruitment or engagement process.</p> <p>We rarely process special category information such as racial, disability, trade union or health information where you have made this available to us.</p>	<p>We mainly collect this information directly from you during recruitment, engagement and onboarding stages.</p> <p>We may use information collated about salary bands and positions for benchmarking purposes, but this information is anonymised or pseudonymised where it is capable of identifying an individual.</p> <p>Sometimes we collect information from third parties such as an agent acting on your behalf (particularly if you are an internal candidate of Cripps Leadership Advisors) or from a third-party recommendation or a person giving a reference, or a background verification service. In some cases when carrying out preliminary references to see which Candidates may be suitable, it is not possible or proportionate for us to inform the Candidates that we have been undertaking this activity.</p> <p>We do use some publicly available sources to find information about potential candidates, specifically LinkedIn, Lusha and company websites.</p>	<p>The processing is necessary for our legitimate interests of assessing suitability for potential roles, to find potential candidates.</p> <p>If you choose to give us special category data (listed in the second column), we will obtain your express consent to process that.</p>
References/ referees	Contact details and correspondence.	Reference contact details may be given to us by candidates as part of a recruitment process. Other personal data about referees is given to us by you directly.	Our legitimate interests as a business in obtaining references about candidates.



Individuals who contact us with general queries	Contact details provided and correspondence.	This information is given to us by you. It is used to respond to the query and keep a record of it.	Our legitimate interests as a business in responding to and keeping a record of correspondence.
Clients and potential clients	Contact details provided and correspondence. Contracts.	<p>This information is given to us by you or is obtained from publicly available information (for example on your website).</p> <p>It is used for us to fulfil contracts and engage in business discussions.</p>	Our legitimate interests as a business in responding to and keeping a record of correspondence. Some information is also necessary for us to perform our contract –for example certain contact details.
Leadership Advisory Service participant (i.e. where you participate in leadership advisory or team development services we are carrying out for your employer or prospective employer)	<p>Contact details, correspondence, CVs, educational records, work history, employment details, references, information provided during leadership sessions, responses, results of psychometric or skills tests, analysis of results and recommendations and opinions.</p> <p>Special category information such as health, disability or ethnicity or racial information is only processed if provided by you.</p>	<p>This information is usually given to us by you. Occasionally we undertake feedback sessions as part of coaching which may involve the provision of information about you from other people known to or nominated by you, such as your current or prospective employer; or a psychometric assessment provider that you have been referred to by us or your employer.</p> <p>We may undertake feedback sessions with you or our client as part of a leadership assessment or team development process, which may involve collecting information about you from other people known to or nominated by you.</p> <p>We use the information to carry out Leadership Advisory services for you or your employer.</p>	<p>Our legitimate interests as a business in providing advisory services. Some information may also be necessary specifically for us to perform the contract, such as your date of birth to facilitate generating the online links required for you to access the service provider's assessments online.</p> <p>We only process special category data with your express consent.</p>

Suppliers and contractors	Contact details including personal or business address, email and telephone number, and provided correspondence.	This information is given to us by you or from publicly available information (for example on your website). It is used for us to fulfil contracts and engage in business discussions.	Our legitimate interests as a business in responding to and keeping a record of correspondence. Some information is also necessary for us to perform our contract –for example certain contact details.
Website visitors	Information from cookies. For more details see our Cookie Notice .	This information is collected via cookies when you use our website. It is used for Google Analytics to help us understand how visitors use our website.	We only install non-essential cookies with your consent. For more details see our Cookie Notice .

Use of Artificial Intelligence (AI) Services

We have a robust AI Policy at Cripps Leadership Advisors, and have taken great care to carry out thorough research and testing of AI products. Like many search and advisory businesses we use AI tools to enhance our services to candidates and clients, and assist our employees with the adoption of selected technology to improve their workflow.

Use of note-taking software (Teams Premium)

It is common for us to use Teams Premium for note taking on calls – this is to assist with efficiency and accuracy of recording information. The summarized transcriptions are saved to our encrypted database and are retained on Microsoft servers for 30 days before being deleted. Teams Premium is not an Open AI platform, any data recorded is not audio or video, just transcribed data and is only used for the purposes of the activity you are engaged in. Please note that we have blocked the IP addresses of all other commonly available note taking software from our systems to prevent any unauthorized use of software by our employees.

Use of Microsoft CoPilot

We use Microsoft CoPilot to collate data already generated by Cripps Leadership Advisors that exists within our Microsoft tenancy. It is not an Open AI Platform and Microsoft servers do not retain the session outside of the window of the request made to CoPilot.



Use of GPT-5-Mini and Open AI in conjunction with our Ezekia database

We use OpenAI's API services to support certain internal processes within our Ezekia database. These services are configured with European Union (EU) data residency, meaning all processing occurs within the EU to comply with GDPR and other applicable data protection laws. Please note:

- We have enabled Zero Data Retention, ensuring that prompts and responses are not stored by OpenAI after processing. Additionally, OpenAI does not use our data to train its models.
- We have signed a Data Processing Addendum (DPA) with OpenAI, which governs the handling of personal data and ensures compliance with GDPR.
- We do not use ChatGPT or any AI tool as a public-facing search function. All AI usage is strictly controlled and limited to internal operational purposes.