PRIVACY STATEMENT

Introduction

ibex gale Limited ('ibex gale', 'we', 'us') respects the privacy of every individual whose personal information we process in providing our services, or whose personal information we may process as a result of providing our services to others, or who applies to work at ibex gale.

Personal information is any information relating to an identified or identifiable living person. When 'you' or 'your' are used in this statement, we are referring to the relevant individual who is the subject of the personal data. ibex gale processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

Purpose of this Privacy Statement

This privacy statement ('Privacy Statement') explains our approach to any personal information that we might collect from you, or which we have obtained about you from a third party, and the purposes for which we use, disclose and process your personal information. This Privacy Statement also sets out your rights in respect of our processing of your personal information.

This Privacy Statement, along with any information provided to you at the point of collection, will inform you of the nature of the personal information about you that is processed by us and how you can request that we delete, update, transfer and/or provide you with access to it.

This Privacy Statement is intended to assist you in understanding how your personal information may be processed by us as a result of providing services to others or access our website. We encourage you to read and understand it. We have a separate Recruitment Privacy Statement which is applicable if you provide your personal information to us (either directly or via a recruitment agency with your consent) to apply to work at ibex gale.

Ibex gale is registered with the ICO, and has appointed Ruth Clacey-Roberts, Head of Quality and Governance, as the person with responsibility for data protection compliance within ibex gale. She can be contacted at rclaceyroberts@ibexgale.com

Who we are and what we do

ibex gale is an English limited company under number 08814594 and whose registered office is at St Brandon's House, 29 Great George Street, Bristol BS1 5QT.

ibex gale provides a range of people management services and support to organisations, including workplace and governance and assurance investigations, mediation and conflict resolution, cultural reviews, organisational change projects, strategic people management and the provision of HR support and advice.

We frequently process data on behalf of organisations that we carry out work for when we are providing services to them. In those situations, we are often classified as a data processor rather than as a data controller. However, there may also be cases where we act as the data controller, for example where you access our website or provide us with information in relation to marketing activities. Whether we are a data processor or a data controller for the purposes of your data will depend on how and why we have processed your data and, in relation to the provision of our services, the nature of the arrangements between us and the organisation we are working for and the nature of the services that we are carrying out.

How to contact us

If you have any questions about this Privacy Statement or want to exercise your rights as set out in this Privacy Statement, please contact us by sending an email to our Data Protection Officer, Ruth Clacey-Roberts, rclaceyroberts@ibexgale.com

Where do we get your personal data from?

There are several ways in which we may obtain your personal data. Where we have direct interactions with you or you use our website, we may collect personal data directly from you. We may also obtain personal data about you from our clients when we are providing our services to them or from other third parties.

Our policy is to collect only the personal data necessary for agreed purposes and where we obtain personal information from our clients we ask them to only share personal information with us where it is required for those purposes and in accordance with relevant data privacy laws.

The categories of personal data processed by us in relation to the services we provide and our business operations are numerous, and it is not possible to provide an exhaustive list. However, they may include:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;

- date of birth;
- gender;
- marital status and dependants;
- salary, annual leave, pension and workplace benefits information;
- employment start date;
- location of employment or workplace;
- recruitment information (including copies of right to work documentation, references, professional qualifications and other information included in a CV or covering letter or as part of the application process);
- employment records (including job titles, work history, working hours, training records and professional memberships);
- compensation history;
- performance information;
- disciplinary and grievance information;
- CCTV footage and other information obtained through electronic means such as swipecard records or your website and internet usage details;
- internal communications such as emails, text messages and messages sent via instant messaging systems and applications;
- information about use of information and communications systems;
- photographs; and
- technical data (which includes technical information about your computer or other devices' unique ID number, technical information about your device such as type of device, web browser or operating system your preferences and settings (such as time zone and language) and data about your browsing actions and patterns.

For certain services that we provide or activities that we undertake, we may process special categories of personal data, including:

- information about race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about trade union membership;
- information about health, including any medical condition, health and sickness records; and
- information about criminal convictions and offences.

We operate a client relationship management database which includes details of individual contacts employed by our current, former and prospective clients together with other professional contacts that we have. The information we hold includes individual contact details, details of our interactions, past work and work opportunities and any other information relevant to our relationship. This information is processed for our legitimate business purposes of marketing our services to interested persons, operating our business and managing our client and other external relationships. We do not systematically share marketing information with third parties.

Use of personal information

We use personal data for a number of different purposes and we have set these out below, together with the legal grounds on which we rely in relation to the processing of such information.

(i) Providing and managing professional services

As outlined above, we provide a range of professional services to organisations. Some of our services require us to process personal data in order to carry out our contractual obligations.

Legal grounds: Legitimate interests, legal obligation, public interest or consent

This processing of personal information by us is necessary for the purposes of the legitimate interests pursued by us in providing professional services and our client in receiving professional services as part of running their organisation.

Where we process special categories of personal data, we will rely on one or more of the following exemptions which are contained in Article 9 of the GDPR:

- that you have provided your explicit consent for the processing of special data;
- that the processing is necessary for the purpose of carrying out obligations and exercising specific rights in relation to your employer (who we may have been

instructed by to undertake duties they owe you on their behalf) in relation to your employment;
- that the processing is necessary for the establishment, exercise, or defense of legal claims;
- the processing is necessary for reasons of substantial public interest on the basis of EU or member state law which shall be proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable an specific measures to safeguard the guard your fundamental rights and interests.

Which specific exemption is applicable to our processing of sensitive data will vary.

(ii) Administering, managing and developing our business and services

We may process personal data in order to run our business, including:

- managing our relationship with clients and prospective clients;
- developing and improving our businesses and services (such as identifying client needs and improvements in service delivery);
- maintaining and using IT systems;
- hosting or facilitating the hosting of events.

Legal grounds: Legitimate interests

This processing is necessary for the purposes of the legitimate interests pursued by us to administer, manage, deliver and develop our business and services.

(iii) Security, quality and risk management activities

We have security measures in place to protect both our and our clients' information (including any personal data which is shared with us), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We may share your data with third party service providers who assist us in our IT activities, please see below for further information about where we share information with third party service providers.

We monitor the services provided to clients for quality purposes, which may involve processing personal data stored on the relevant client file. We have policies and procedures in place to monitor and improve the quality of our services and manage risks. We collect and hold personal data as part of our client engagement and acceptance procedures.

Legal grounds: Legitimate interests

This processing is necessary for the purposes of the legitimate interests pursued by us to ensure network and information security, manage risks to our business and check the quality of our services.

(iv) Providing our clients and prospective clients with information about us and our range of services

There are a number of ways in which we provide our clients and prospective clients with information about our range of services and things we think will be of interest about us and our services, including industry insights, other relevant services and event invitations. We may also process your data in order to operate our website, undertake marketing activities and in relation to digital communications that we send out. The key areas where we may process your data are set out below including the legitimate interest relied on in relation to each of them.

Website contact forms

Where you contact us through our website contact forms, we process your personal data for the purposes of responding to your enquiry, communicating with you and administering our business and marketing relationship with you.

Legal grounds: Legitimate interests, consent and, where applicable, taking steps prior to entering into a contract

This processing is necessary for our legitimate interests in operating and developing our business and services, promoting our business and services and responding to enquiries you have made relating to our services.

Where you have provided your information through our website contact form and consented to our processing of your data, you may withdraw your consent or unsubscribe from our marketing communications at any time by using the unsubscribe link in our emails or by contacting us directly at contactus@ibexgale.com.

Downloadable resources and marketing communications

Where you request downloadable resources, subscribe to newsletters or opt in to receive marketing communications, we process your personal data in order to provide the requested materials and send relevant updates and marketing communications.

We may also send relevant marketing communications, industry insights and event invitations to business contacts at our current, former and prospective clients, where we

consider that we have a legitimate interest in doing so and where permitted under applicable electronic marketing laws.

Legal ground: Consent and legitimate interests

Such processing is necessary for our legitimate interests in operating and developing our business and services, promoting our business and services.

Where we rely on consent, you may withdraw your consent at any time. Where we rely on legitimate interests you may object to the use of your personal data for direct marketing at any time.

To withdraw your consent, object, or unsubscribe from our marketing communications at any time by using the unsubscribe link in our emails or by contacting us directly at contactus@ibexgale.com

Website analytics, cookies and advertising

We use Google Ads to promote our services online. When users click on our advertisements, certain information relating to advertising campaign and website interaction may be collected, including referral URLs, campaign identifiers and form submission details. This information is used to measure the effectiveness of our advertising campaigns and improve our marketing activity.

We may use information you provide to us to create custom advertising audience matching through platforms such as Google Ads, allowing us to show relevant advertisements to existing customers and subscribers when they use Google services. The information is securely transferred and processed by Google Ads using privacy enhanced techniques. We do not receive information about individual users who are matched, nor do we receive access to their advertising identifiers or browsing activities. We only use personal data for audience matching where we have an appropriate lawful basis under applicable data protection law (as identified below). Individuals may opt out of our marketing communications at any time and may exercise their data protection rights as set out elsewhere in this statement.

Our website uses cookies and similar technologies to support website functionality, security, analytics and user preferences. We use Cookiebot to manage cookie consent preference and maintain records of user consent choices. Details of the cookies used on our website are set out in our Cookie Notice.

Legal grounds: Consent and legitimate interests

Where required by law, we obtain your consent to using your personal data for marketing activities and before placing non-essential cookies or analytics technologies on your device. This processing is also necessary for our legitimate interest in:

- understanding website usage;

- maintaining, administering and improving website security, functionality and performance;

- measuring the effectiveness of advertising campaigns;

- providing relevant advertisements to existing customers and subscribers when they use Google services.

Surveys and webinars

We may conduct surveys or webinars. Surveys are generally anonymous unless otherwise stated. Where identifiable personal data is collected as part of a survey, webinar registration or attendance process, we will only use that information for internal business purposes, including administration, analysis and service improvement, and will not share it with third parties except where necessary to provide the relevant service. We may use Microsoft Teams to host webinars and virtual events. Participation in these events may involve the processing of attendee information such as names, email addresses, organisation details and attendance data.

Legal grounds: legitimate interest and consent

Where surveys or webinar or event registration involves the processing of identifiable personal data, we process that information for our legitimate interests in administering events, improving our services and obtaining and sharing business insight. Where participation is optional and consent is requested, we rely on consent as the lawful basis.

We do not share your personal data with third parties for their own marketing purposes without your explicit consent. We may share your data with third-party service providers we use in connection with website hosting, analytics, marketing communications, webinars and cloud services. These third-party providers may process data outside of the UK. Where personal data is transferred internationally, we ensure that suitable safeguards are in place in accordance with applicable data protection laws and we ensure that that third-party providers are contractually obligated to protect your data and use it only for the purposes we specify.

(v) Complying with any requirement of law, regulation or a professional body of which we are a member

As with any provider of professional services, we may be subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with any such obligations and those records may contain personal data.

Legal grounds: Legal obligation or legitimate interests

This processing is necessary for us to comply with a legal obligation and, where we do not have a legal obligation, we have a legitimate interest in processing personal data as necessary to meet our regulatory or professional obligations.

(vi) Other business-related purposes

We are continually looking for ways to help our clients and improve our business and services. Where agreed with our clients, we may use information that we receive in the course of providing professional services for other lawful purposes, including analysis to better understand a particular issue, industry or sector, provide insights back to our clients, to improve our business, service delivery and offerings and to develop new ibex gale technologies and offerings. To the extent that the information we receive in the course of providing professional services contains personal data, we will de-identify the data prior to using the information for these purposes. Data provided to us may be used for testing, validation and improvement of any bespoke closed AI systems used by us.

Legal grounds: Legitimate interests

We have a legitimate interest in de-identifying data to help our clients, to improve our business, service delivery and offerings and to develop new ibex gale technologies and offerings, including by performing benchmarking and analysis.

Use of Artificial Intelligence ('AI')

As part of our commitment to delivering innovative and high-quality services, we take advantage, where appropriate, of generative artificial intelligence tools. Transparency, accountability, quality and privacy are fundamental principles to us, and we frequently review how AI is being used and have an internal AI Usage Policy and guidelines to ensure that AI is being used responsibly within ibex gale.

We are committed to upholding ethical marketing practices, safeguarding against AI biases and maintaining data security.

(i) **How we use AI**

We may process personal data using AI for the following purposes:

- content generation and drafting support (for example preparation of documents, reports and communications);

- administrative efficiency (for example matter management, document organisation and workflow automation);

- research and knowledge support (for example identifying trends and insights);
- quality assurance and consistency checks (for example review of outputs for completeness and clarity);
- marketing activities;
- business objectives.

We use AI to support human expertise and professional judgement. We do not use AI for profiling or to make automated decisions about individuals and we do not use AI to determine eligibility, rights, employment outcomes, contractual decisions or other decisions that produce legal or similarly significant effects. Any outputs generated by AI are shaped, validated, reviewed and approved by our people using their expertise and knowledge, against an understanding of the limitations that AI can have including bias, inaccuracies and inappropriate outcomes.

We only use general purpose large language models which do not use data that they process to train foundation AI models. Personal data that is processed by closed AI tools or models within ibex gale may be used to test, train and develop that tool or model.

Personal data may be processed using the following AI tools and models:

- general purpose large language models (such as Copilot); and
- bespoke closed AI systems that operate within ibex gale and are not large language models.

Where we use bespoke closed AI systems we ensure that appropriate testing of the system has been undertaken in relation to data security, ensure that they have the appropriate security controls in place and Data Protection Impact Assessments are undertaken in relation to them.

We have set out earlier in this document the specific grounds relied on for the different processing activities that we undertake, these are also applicable where we process data using AI to support that activity.

Data retention

We retain the personal data processed by us (including that processed by AI) for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

In the absence of specific legal, regulatory or contractual requirements, our baseline retention period for records and other documentary evidence created in the provision of services is 6 years. The exception to this is video and audio recordings obtained during the

course of interviews that we undertake relating to the provision of our services, which are deleted after a period of 41 days unless otherwise agreed.

Personal data may be held for longer periods where extended retention periods are required by law or regulation and in order to establish, exercise or defend our legal rights.

When and how we share personal data and locations of processing

Throughout our collaboration with you or your organisation, we utilise specific third-party technology services (including third party AI providers) to enhance our work and we may provide these third-party providers with personal data. These services, which may include word processing and meeting software provided by Microsoft, the use of approved third-party technology providers (such as providers of general-purpose large language models as well as providers of bespoke AI tools) and communication services for improved collaboration and coordination, are essential for efficient operations. Additionally, we employ various ancillary services, such as in person and AI note-taking services.

To facilitate these services, your personal information may be stored in the cloud or infrastructure managed by the relevant third-party service provider. However, all of our third-party providers are strictly prohibited from sharing or using this information for any purpose other than serving us and all the services that we utilise have the necessary contractual, privacy, security and compliance frameworks to ensure the security of any personal data used within them. We conduct due diligence and risk assessments, including Data Protection Impact Assessments where appropriate. We adhere to applicable laws, providing additional notice and obtaining consent when sharing personal data.

There are instances where we must share your personal information with regulators, government agencies, enforcement bodies, courts, and other third parties.

Some of your personal information may be stored in a cloud located within or outside of the UK, the EEA or your own jurisdiction and managed by a third-party service provider. When this occurs we conduct thorough due diligence to ensure the security of third-party technology systems and that transfers of data outside of the UK are conducted in compliance with UK GDPR requirements for international data transfers with the appropriate safeguards in place.

Confidentiality and security of your personal information

We are committed to keeping the personal information provided to us secure and we will take reasonable precautions to protect personal information from loss, misuse or alteration.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

All of our employees, workers, consultants and data processors (i.e. those who process your personal information on our behalf, for any of the purposes listed above), who have access to, and are associated with, the processing of personal information, are obliged to respect the confidentiality of the personal information of all individuals whose personal information we process in the course of providing our services and running the business.

How to access your information and your other rights

If we are the data controller in respect of your personal information, you have the following rights in relation to the personal information we hold about you. Please note that these rights are subject to certain exemptions which may be applicable to any request you make.

i. Your right of access

If you ask us, we'll confirm whether we are processing your personal information. If you submit a subject access request then, subject to any applicable exemptions, we will undertake reasonable and proportionate searches for the personal information which falls within your subject access request and provide you with a copy of that personal information (along with certain other details).

We try to respond to all legitimate requests as soon as possible, and within one calendar month of their receipt. Where the request is complex or we have received a number of requests from you we may extend this by a maximum of a further two months. If we need to extend the time limits, we will tell you why we consider your request to be complex and provide you with the date by which we will respond substantively. We will update you in this regard within the first calendar month of receipt of your request.

We may need to ask you to verify your identity or ask you to clarify the scope of your request, in those circumstances the timeframes for responding to the subject access request will be paused until this information is provided.

If we will not be complying with your subject access request or where the search (or aspects of it) would be unreasonable or disproportionate, we will provide you with an explanation as to why we will not be complying with your request.

If you require additional copies of any information provided to you, we may charge a reasonable fee.

ii. Your right to rectification

If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If you are entitled to rectification and if we've shared your personal information with others, we'll let them know about the rectification where possible and where this would not involve disproportionate effort. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

iii. Your right to erasure

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable because that was the legal basis on which we were processing your personal information). If you are entitled to erasure and if we've shared your personal information with others, we'll take reasonable steps to inform those others where possible and where this would not involve disproportionate effort. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

iv. Your right to restrict processing

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or you object to us processing your personal information. If you are entitled to restriction and if we've shared your personal information with others, we'll let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

v. Your right to data portability

With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

vi. Your right to object

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or

- processing your personal information for direct marketing.

vii. Your rights in relation to automated decision-making and profiling

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

viii. Your right to withdraw consent

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

If you want to exercise any of these rights you can do so by contacting Ruth Clacey Roberts at rclaceyroberts@ibexgale.com who is our appointed Data Protection Officer.

ix. Your right to lodge a complaint

We aim to promptly, efficiently and satisfactorily resolve any concerns or complaints you may have regarding our processing of your personal data and we are committed to engaging with any complaints proactively, without the need to refer them to the ICO.

If you have any concerns or complaints about the way in which ibex gale is processing your personal data, you have the right to submit a complaint to us. Any such complaints should be sent to Ruth Clacey-Roberts, who is our nominated DPO at rclaceyroberts@ibexgale.com. Such complaints will be addressed using the 'formal written complaint' process as set out in ibex gale's Complaints Procedure which can be found on our website.

We would encourage you to take advantage of our internal process as described above to discuss with us any relevant concerns or complaints you may have. However, if you do not wish to do so, or if we do not resolve your concerns or complaints to your satisfaction, you may also report it to the Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at https://ico.org.uk/concerns/ or by calling their office on 0303 123 1113.

Changes to this Privacy Statement

We may make changes to this Privacy Statement from time to time.

To ensure that you are always aware of how we use your personal information we will update this Privacy Statement from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We encourage you to review this Privacy Statement periodically to be informed of how we use your personal information.