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(A) This Policy This Policy is provided by Lester Lane ("Lester Lane", "we" or "us"), and is addressed to individuals outside our organisation with whom we interact, including (but not limited to) Clients, Candidates, Participants, Sources and visitors to our websites (together, "you"). Defined terms used in this Policy are explained further in Section (O) below. For the purposes of this Policy, Lester Lane is the Controller. Contact details are provided in Section (M) below. Please note that this Policy does not apply to the Processing by Lester Lane of the Personal Information of Lester Lane employees, temporary workers or other staff in connection with the roles they perform for Lester Lane. A separate privacy internal policy governs such Processing. This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Information, or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Policy. We will notify you of any significant changes.

(B) Processing your Personal Information

Collection of Personal Information: We may collect Personal Information about you, such as your name, address and contact details. Examples of sources from which we may collect Personal Information include the following: We may obtain your Personal Information when you provide it to us (e.g., where you contact us via email or telephone, or by any other means). We may collect your Personal Information in the ordinary course of our relationship with you (e.g., if we offer to connect you with our Clients we may collect your Personal Information that are related to such Client opportunities, such as your résumé). We may collect Personal Information that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible). We may receive your Personal Information from third parties who provide it to us (e.g., past employers; referees; and law enforcement agencies). We may, with your prior express written consent, conduct background checks, in accordance with the protections provided by applicable law. We may collect or obtain Personal Information when you visit any Lester Lane website (the "Site") or use any features or resources available on or through a Site. When you visit a Site, your device and browser will automatically disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a Site and other technical communications information), some of which may constitute Personal Information.

Creation of Personal Information: We may also create Personal Information about you, such as records of any interviews you attend. We collect, process and store information when you send, receive, or engage with messages in connection with our Services. This includes information such as the number of messages you've sent and received, details of who you've chatted with and when and which messages were responded to ("Message Data"). This Personal Information helps us to conduct our operations and manage our workforce. We also may use automatic scanning technology on messages to allow us to recognize patterns on our messaging platform. These patterns may help us make your professional communications more efficient and informed and contribute to a safer and more secure job search experience. For example, our software may do the following: Look for text that indicates a web link (e.g. ends with ".com" or similar) to generate

a clickable link Provide auto-complete options when it anticipates who the receiver of the message may be Look for content to provide quick actions such as a scheduling tool Look for content to provide quick replies based on context Check links shared in messages for malicious sites and looks for blacklisted keywords to detect spam and fraud. Personal Information you provide about others: In some circumstances, you may provide us with Personal Information about others. For example, you might act as a Source and provide comments on a Candidate or Participant. Whenever you provide any such Personal Information, we rely on you to ensure that you have a lawful basis for providing such Personal Information to us, and that you have complied with applicable law and with the terms of this Policy. If you are unable to do so, please refrain from providing the Personal Information of third parties to us. Relevant Personal Information: The categories of Personal Information about you that we may Process include: Personal details: given name(s); preferred name; gender; date of birth / age; nationality; photograph; marital status; job title; employer entity; department; salary and compensation details; passport number (where applicable); visa number (where applicable); and work authorisation number (where applicable). Contact details: home address; work address; home telephone number; work telephone number; work mobile number; personal mobile telephone number; personal email address; work email address; and social media profile details. Employment records: dates and details of current and former positions held; details of current and former employers; dates of employment; job titles; job locations; subject matter experience; and details of any employment disciplinary issues or incidents. Details of referees: details of referees you may provide, including the relationship that you may have with each such referee, and the duration for which you have known each such referee. Background checks: details revealed by background checks conducted in accordance with applicable law and subject to your prior express written consent, including details of past employments, details of residence, credit reference information, and criminal records checks. Views and opinions: your views on Candidates or Participants, where applicable. Lawful basis for Processing Personal Information: In Processing your Personal Information in connection with the purposes set out in this Policy, we may rely on one or more of the following legal bases: we have obtained your prior express consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way); the Processing is necessary in connection with any contract that you may enter into with us; the Processing is required by applicable law; the Processing is necessary to protect the vital interests of any individual; or we have a legitimate interest in carrying out the Processing, which is not overridden by your interests, fundamental rights, or freedoms. Where we rely on this legal basis, our legitimate interests are: our legitimate interest in the management and operation of our business; our legitimate interest in the promotion of our business; and our legitimate interest in the provision of services to our Clients. Processing your Sensitive Personal Information: We do not seek to collect or otherwise Process your Sensitive Personal Information, except where: the Processing is required or permitted by applicable law (e.g., to comply with diversity reporting obligations); the Processing is necessary for the detection or prevention of crime; the Processing is necessary for the establishment, exercise or defence of legal rights; or we have, in accordance with applicable law, obtained your prior explicit consent before Processing your Sensitive Personal Information (as above, this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way). Purposes for which we may Process your Personal Information: The purposes for which we may Process Personal Information, subject to applicable law, include: Recruitment activities on behalf of Clients: recruitment operations; advertising Client

opportunities; providing services to our Clients; enabling Clients to understand which Candidates are interested in their opportunities; record-keeping; and performing background checks. Provision of services to you: providing our Sites and other services to you; attending meetings with you; attending telephone calls with you; and otherwise communicating with you in relation to those services. Our Sites: operating and managing our Site; providing content to you; displaying advertising and other information to you; and communicating and interacting with you via our Site. Training: providing you with training and preparation for interviews. Newsletters and other marketing communications: communicating with you via any means (including via email, telephone, text message, social media, post or in person) news items and possible opportunities in which you may be interested. Communications and IT operations: management of our communications systems; operation of IT security; and IT security audits. Health and safety: health and safety assessments and record keeping; and compliance with related legal obligations. Financial management: sales; finance; corporate audit; and vendor management. Surveys: engaging with you for the purposes of obtaining your views on relevant issues and topics. Improving our services: identifying issues with existing services; planning improvements to existing services; creating new services.

(C) Disclosure of Personal Information to third parties We may disclose your Personal Information to: legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation; our Clients, for the purposes of providing services to those Clients, in accordance with the provisions of this Policy; accountants, auditors, lawyers and other outside professional advisors, subject to binding contractual obligations of confidentiality; third party Processors (such as providers of background checking services), located anywhere in the world, subject to the requirements noted below in this Section (C); any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights; any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security; any relevant third-party acquirer(s), in the event that we sell or transfer all or any portion of our business or assets (including in the event of a reorganization, dissolution or liquidation); and our Site may use third party plugins or content (e.g., Facebook, Twitter, Google+ and LinkedIn). If you choose to interact with any such plugins or content, your Personal Information may be shared with the relevant third party. If we engage a third-party Processor to Process your Personal Information, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Information in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Information (iii) the contractual obligations are approved by the ICO (UK Data Processing Authority).

(D) International transfer of Personal Information Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your Personal Information, so European law has prohibited transfers of Personal Information outside of the EEA unless the transfer meets certain criteria. Whenever we transfer your Personal Information out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented: We will only transfer your Personal Information to countries that have been deemed to provide an adequate level of protection for Personal Information by the European Commission; or Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give Personal Information the same protection it has in Europe; or Where we share information with clients based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to

provide similar protection to Personal Information shared between the Europe and the US. If none of the above safeguards is available, we may request your explicit consent to the specific transfer. Please email us at info@Lester Lane.com if you want further information on the specific mechanism used by us when transferring your Personal Information out of the EEA.

(E) **Data Security** We have implemented appropriate technical and organisational security measures designed to protect your Personal Information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law. You are responsible for ensuring that any Personal Information that you send to us is sent securely.

(F) **Data Accuracy** Your Personal Information that we Process will be kept accurate and, where necessary, kept up to date. We take every reasonable step to ensure that: your Personal Information that we Process are accurate and, where necessary, kept up to date; and any of your Personal Information that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay. From time to time we may ask you to confirm the accuracy of your Personal Information.

(G) **Data Minimisation** We take every reasonable step to ensure that your Personal Information that we Process are limited to the Personal Information reasonably required in connection with the purposes set out in this Policy.

(H) **Data Retention** We will keep copies of your Personal Information in a form that permits identification only for as long as is necessary in connection with the purposes set out in this Policy unless applicable law permits or requires a longer retention period. Should you wish to withdraw that permission, you may do so using the contact details provided in Section (M) below.

(I) **Your legal rights** Subject to applicable law, you may have a number of rights regarding the Processing of your Personal Information, including: the right to request access to, or copies of, your Personal Information that we Process or control; the right to request rectification of any inaccuracies in your Personal Information; the right to request erasure of your Personal Information that we Process or control; the right to request restriction of Processing of your Personal Information that we Process or control; the right to object to the Processing of your Personal Information; the right to have your Personal Information transferred to another Controller, to the extent applicable; where we Process your Personal Information on the basis of your consent, the right to withdraw that consent; and the right to lodge complaints regarding the Processing of your Personal Information with a Data Protection Authority. To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Policy, or about our Processing of your Personal Information, please use the contact details provided in Section (M) below.

(J) **Cookies** This Notice applies to the following website that is operated or controlled by Lester Lane: www.Lester Lane.com What are cookies? Cookies are small text files that may be stored on your computer or other device when you visit a website. They are generally used to make websites work, to keep track of your movements within the website, to remember your login details, and so on. There are different types of cookies, and they can be distinguished on the basis of their origin, function and lifespan. Important characteristics of cookies include the following: First party cookies are cookies that are placed by the website you are visiting, while third party cookies are placed by a website other than the one you are visiting. Please note that we do not control the collection or further use of data by third parties. Necessary cookies are necessary to allow the technical operation of a website (e.g., they enable you to move around on a website and to use its features). Performance cookies collect data on the performance of a website such as the number of visitors, the time spent on the website and error messages. Functionality cookies increase the usability of a website by remembering your choices (e.g. language, region, login, and so on). Targeting/advertising cookies enable

a website to send you personalized advertising. Session cookies are temporary cookies that are erased once you close your browser while persistent or permanent cookies stay on your device until you manually delete them or until your browser deletes them based on the duration period specified in the persistent cookie file. More information on all aspects of cookies can be found on www.allaboutcookies.org. Please note that Lester Lane has no affiliation with, and is not responsible for, this third party website. Why do we use cookies? We may use cookies to: distinguish between visitors; improve the use and the functionality of our website; tailor our website and products to your needs and preferences; and analyse how our website is used and compile anonymous and aggregate statistics. We do not use the collected information to create visitor profiles. What types of cookies do we use? This website uses cookies to better the users experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors. This website also uses the Twitter Button Widget to connect with the Twitter Blog. Please note that the processing of your Personal Information in connection with cookies, and for other purposes, is governed by our Privacy Policy. How can you control cookies and web beacons? Most internet browsers are set to automatically accept cookies. Depending on your browser, you can set your browser to warn you before accepting cookies, or you can set it to refuse them. Please refer to the 'help' button (or similar) on your browser to learn more about how you can do this. Disabling cookies may impact your experience on our website. If you use different devices to access our websites, you will need to ensure that each browser of each device is set to your cookie preference. More information on how to manage cookies is available from: <http://www.allaboutcookies.org/manage-cookies/>. Please note that Lester Lane has no affiliation with, and is not responsible for, this third-party website. In addition, you may opt-out from cookies by visiting the following sites and selecting which company cookies you would like to opt-out from: <http://www.aboutads.info/choices/#completed> and <http://www.youronlinechoices.com/>. Please note that Lester Lane has no affiliation with, and is not responsible for, these third-party websites. More information on web beacons can be found at <http://www.allaboutcookies.org/faqs/beacons.html> . Please note that Lester Lane has no affiliation with, and is not responsible for, this third-party website. (K) Terms of Use All use of our Site is subject to our Legal Disclaimer at the end of this Policy. (L) Your obligations If, and to the extent that, you are a Candidate or Participant, we rely on you to provide us with complete and accurate Personal Information about you, so that we can provide appropriate services to you and to our Clients. If, and to the extent that, you are a Source, we rely on you to ensure that you are lawfully able to disclose Personal Information to us, as set out in this Policy. (M) Contact details If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Information by Lester Lane, please contact either David Eales or Martin Litherland by writing to info@LesterLane.com If you wish to contact the ICO you can call them on 0303 123 1113 or the support page on <https://ico.org.uk/global/contact-us/> . Lester Lane has the ICO registration number A8286923 (N) Children's Privacy Lester Lane does not knowingly collect or solicit Personal Information from anyone under the age of 13 or knowingly allow such persons to register to use the Services. No one under age 13 is allowed to provide any Personal Information to Lester Lane or on the Site. In the event that we learn that we have collected Personal Information from a child under age 13, we will delete that information as quickly as possible. If you believe that we might have any

information from or about a child under 13, please contact us at info@Lester Lane.com

(O) Definitions Candidate' means a candidate, or potential candidate, for a position with a Client. Client' means a client of Lester Lane. "Controller' means the entity that decides how and why Personal Information is Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws. Data Protection Authority' means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws. Personal Information' means information that is about any individual, or from which any individual is identifiable. Examples of Personal Information that we may Process are provided in Section (B) above. Personnel' means any current, former or prospective employee, consultant, temporary worker, intern, other non-permanent employee, contractor, secondee or other personnel. "Process', 'Processing' or 'Processed' means anything that is done with any Personal Information, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. 'Processor' means any person or entity that Processes Personal Information on behalf of the Controller (other than employees of the Controller). 'Sensitive Personal Information' means Personal Information about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law. 'Source' means any person that provides any view or opinion regarding the qualities of any Candidate or Participant, for any purpose, including but not limited to the suitability of a Candidate or Participant for a particular role.

(O) Equality Policy Policy Statement Lester Lane Ltd recognises that discrimination and victimisation is unacceptable and that it is in the interests of the Company and its employees to utilise the skills of the total workforce. It is the aim of the Company to ensure that no employee or job applicant receives less favourable facilities or treatment (either directly or indirectly) in recruitment or employment on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation (the protected characteristics). Our aim is that our workforce will be truly representative of all sections of society and each employee feels respected and able to give of their best. We oppose all forms of unlawful and unfair discrimination or victimisation. To that end the purpose of this policy is to provide equality and fairness for all in our employment. All employees, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. All employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation. Our staff will not discriminate directly or indirectly, or harass customers or clients because of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation in the provision of the Company's goods and services. This policy and the associated arrangements shall operate in accordance with statutory requirements. In addition, full account will be taken of any guidance or Codes of Practice issued by the Equality and Human Rights Commission, any Government Departments, and any other statutory bodies. Lester Lane Limited recognised the Modern Slavery 2015 and as a business guarantees full commitment and support to this legislation. More information can be found here <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted> Our Commitment To create an environment in which individual differences and the contributions of all our staff are recognised and valued. Every employee is entitled to a working environment that promotes dignity and respect to all. No

form of intimidation, bullying or harassment will be tolerated. Training, development and progression opportunities are available to all staff. To promote equality in the workplace which we believe is good management practice and makes sound business sense. We will review all our employment practices and procedures to ensure fairness. Breaches of our equality policy will be regarded as misconduct and could lead to disciplinary proceedings. This policy is fully supported by senior management and has been agreed with trade unions and/or employee representatives. The policy will be monitored and reviewed annually

Responsibilities of Management Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Chief Executive. Directors / Managers will ensure that they and their staff operate within this policy and arrangements, and that all reasonable and practical steps are taken to avoid discrimination. Each manager will ensure that: all their staff are aware of the policy and the arrangements, and the reasons for the policy; grievances concerning discrimination are dealt with properly, fairly and as quickly as possible; proper records are maintained. Human Resources / Head Office will be responsible for monitoring the operation of the policy in respect of employees and job applicants, including periodic departmental audits.

Responsibilities of Staff Responsibility for ensuring that there is no unlawful discrimination rests with all staff and the attitudes of staff are crucial to the successful operation of fair employment practices. In particular, all members of staff should: comply with the policy and arrangements; not discriminate in their day to day activities or induce others to do so; not victimise, harass or intimidate other staff or groups who have, or are perceived to have one of the protected characteristics. ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic. inform their manager if they become aware of any discriminatory practice.

Third Parties Third-party harassment occurs where a Company employee is harassed, and the harassment is related to a protected characteristic, by third parties such as clients or customers. 83 Zero will not tolerate such actions against its staff, and the employee concerned should inform their manager / supervisor at once that this has occurred. 83 Zero will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

Related Policies and Arrangements All employment policies and arrangements have a bearing on equality of opportunity. The Company policies will be reviewed regularly and any discriminatory elements removed.

Rights of Disabled People The Company attaches particular importance to the needs of disabled people. Under the terms of this policy, managers are required to: make reasonable adjustment to maintain the services of an employee who becomes disabled, for example, training, provision of special equipment, reduced working hours. (NB: managers are expected to seek advice on the availability of advice and guidance from external agencies to maintain disabled people in employment); include disabled people in training/development programmes; give full and proper consideration to disabled people who apply for jobs, having regard to making reasonable adjustments for their particular aptitudes and abilities to allow them to be able to do the job.

Equality Training A series of regular briefing sessions will be held for staff on equality issues. These will be repeated as necessary. Equality information is also included in induction programmes. Training will be provided for managers on this policy and the associated arrangements. All managers who have an involvement in the recruitment and selection process will receive specialist training.

Monitoring The Company deems it appropriate to state its intention not to discriminate and assumes that this will be translated into practice consistently across the organisation as a whole. Accordingly, a monitoring system will be introduced to measure the effectiveness of the policy and arrangements. The system will involve the routine collection and analysis of information on employees by gender, marital status, ethnic origin, sexual orientation, religion / beliefs, grade and length of

service in current grade. Information regarding the number of staff who declare themselves as disabled will also be maintained. There will also be regular assessments to measure the extent to which recruitment to first appointment, internal promotion and access to training/development opportunities affect equal opportunities for all groups. We will maintain information on staff who have been involved in certain key policies: Disciplinary, Grievance and Bullying & Harassment. Where appropriate equality impact assessments will be carried out on the results of monitoring to ascertain the effect of the Company policies and our services / products may have on those who experience them. The information collected for monitoring purposes will be treated as confidential and it will not be used for any other purpose. If monitoring shows that the Company, or areas within it, are not representative, or that sections of our workforce are not progressing properly within the Company, then an action plan will be developed to address these issues. This will include a review of recruitment and selection procedures, Company policies and practices as well as consideration of taking legal Positive Action. Grievances/Discipline Employees have a right to pursue a complaint concerning discrimination or victimisation via the Company Grievance or Harassment Procedures. Discrimination and victimisation will be treated as disciplinary offences and they will be dealt with under the Company Disciplinary Procedure. Review The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of the Company

DISCLAIMER This website and its content are provided as is and excludes to the fullest extent permitted by applicable law any warranty, express or implied, including, without limitation, any implied warranties of merchantability, satisfactory quality or fitness for a particular purpose. The functions embodied on, or in the materials of, this website are not warranted to be uninterrupted or without error. You, not Lester Lane assume the entire cost of all necessary servicing, repair or correction due to your use of this website. Except as specifically stated in our privacy policy, or elsewhere on this website, or as otherwise required by applicable law, neither Lester Lane nor its affiliates or other representatives will be liable for damages of any kind arising out of your use of, your inability to use, or the performance of this website or the Content whether or not we have been advised of the possibility of such damages. We take all reasonable steps to ensure the accuracy, correctness and reliability of the content, but we make no representations or warranties as to the accuracy, correctness or reliability of the content. This website may contain links to other websites; we are not responsible for any content contained on these websites or any loss suffered by you in relation to your use of such websites. You waive any and all claims against Lester Lane regarding the inclusion of links to other websites or your use of those web sites.