

Armstrong International & Armstrong International Capital

Privacy Notice

Armstrong International Ltd ("Armstrong International") and Armstrong International Capital Ltd ("Armstrong International Capital") (together, "we", "us", "our") are committed to protecting the privacy and security of your personal data. This Privacy Notice explains how we collect, use, disclose, and safeguard personal data when you visit our website or interact with us as a candidate, investor, or other business contact.

We are independent **data controllers** for the purposes of the UK GDPR and EU GDPR.

1. Who We Are

- **Armstrong International Ltd** – a talent search and executive recruitment firm.
- **Armstrong International Capital Ltd** – a capital raising and investor relations firm.

2. What Personal Data We Collect

We may collect the following categories of personal data:

Candidates (Armstrong International)

- Identification data (name, title)
- Contact details (email, phone number)
- CVs, employment history, qualifications
- Compensation expectations
- Notes from interviews or assessments
- Right-to-work documentation (where required)
- References (with your consent)

Investors / Prospective Investors (Armstrong International Capital)

- Identification data (name, title)
- Business contact details
- Investment background and interests
- Information provided in due diligence communications
- Notes of meetings or calls

Website Visitors

- IP address and device data
- Website usage analytics
- Cookies (see Cookie Notice)

3. How We Collect Your Data

- Directly from you (forms, emails, meetings)
- From publicly available sources (e.g., LinkedIn, company websites)
- From referrals or professional networks
- From analytics tools

4. Legal Bases for Processing

We process your personal data under the following legal bases:

- **Legitimate interests** – recruitment activities, business development, investor communications
- **Consent** – where required (e.g., for marketing or reference checks)
- **Legal obligations** – compliance with AML, KYC, tax, or financial regulation
- **Contractual necessity** – where engaging with you under a contract

5. How We Use Personal Data

- Candidate assessment and recruitment processes
- Maintaining a talent database
- Investor communication and relationship management
- Regulatory compliance
- Business development and record-keeping
- Website optimisation and analytics

6. Sharing of Personal Data

We may share your data with:

- Clients who may wish to engage you (for candidates)
- Fund managers or investment opportunities (for investors)
- Professional advisers (legal, compliance, audit)

- IT service providers and secure cloud hosting
- Regulatory authorities where legally required

We do **not** sell your personal data.

7. Transfers Outside the UK/EU

If we transfer data outside the UK/EU, we will ensure appropriate safeguards such as:

- Adequacy regulations
- Standard Contractual Clauses (SCCs)

8. Data Retention

We retain:

- Candidate data: usually up to **3–6 years**, unless you request deletion.
- Investor data: up to **6 years** after the end of an investor relationship.
- Regulatory records: as legally required (often **5–7 years**).

9. Your Rights

You may request:

- Access to your data
- Correction or deletion
- Restriction of processing
- Transfer (data portability)
- Objection to processing
- Withdrawal of consent (where applicable)

Contact us at: **enquiries@armstrongint.com**

10. Complaints

You may complain to the **Information Commissioner's Office (ICO)**: <https://ico.org.uk>

