

Privacy Statement

www.e-search.nl

Effective date: 1st of March 2025 | Version 1.0

1. Introduction

e-search is the executive search brand of Monkhorst Management. We are a boutique executive search firm specialised in recruiting commercial and management talent for Dutch and European B2B organisations, in sectors including fleet management, mobility, medtech, cleanroom and industrial markets.

Our work depends on the careful handling of personal data: data of candidates we identify and approach, data of client contacts who give us search assignments, data of reference providers, and data of visitors to our website www.e-search.nl. This Privacy Statement explains, in plain English, how we collect, use, share and protect that data, and what your rights are under the EU General Data Protection Regulation (GDPR) and the Dutch GDPR Implementation Act (UAVG).

Headhunter's note. As an executive search firm, we identify and contact senior professionals based on their publicly visible career, mostly via LinkedIn. We do this on the basis of "legitimate interest" (Article 6(1)(f) GDPR). You always have the right to object — see Section 12 — in which case we will stop contacting you and remove or anonymise your data.

2. Who is responsible for your data

Controller: Monkhorst Management, trading as e-search executive search.

Registered office: Weerdestein 43, 1083 GB Amsterdam, The Netherlands.

Chamber of Commerce (KvK Amsterdam): 67182887.

VAT number: NL001381089B46.

Website: www.e-search.nl

Contact: by email to info@e-search.nl or via the contact form on the Website.

Given the size of our practice, we have not appointed a Data Protection Officer (DPO), but privacy matters are handled directly by the founder. For any privacy question, you reach a decision-maker, not a help desk.

3. Whose data we process

This Privacy Statement covers four main groups of people:

- Candidates — senior professionals we identify, approach, assess and (where applicable) present to our clients.
- Client contacts — HR, hiring managers and executives at organisations that engage us for a search.
- References — people who provide a professional reference about a candidate at the candidate's request.
- Website visitors and newsletter subscribers — people who interact with www.e-search.nl or our mailings.

4. What personal data we process

4.1 Candidates

Depending on the stage of the relationship, we may process:

- Identification and contact details: name, photograph (from LinkedIn), email address, phone number, postal address, nationality if relevant to the role.
- Career data: current and previous employers, job titles, responsibilities, achievements, education, languages, certifications.
- Information you share with us: CV, letter, salary expectations, motivation, availability, mobility constraints, preferences regarding role and location.
- Information generated during the search: our interview notes, structured competency assessments, our internal evaluation score, reference notes.
- Correspondence: emails, LinkedIn messages, WhatsApp / SMS where used, call notes.

We do not actively seek special categories of data (such as health, religion, political opinion, ethnic origin, trade union membership or sexual orientation) and we ask candidates and clients not to share them with us. If such data is shared anyway, we delete it unless we are legally required to keep it.

4.2 Client contacts

- Name, job title, employer, business email, business phone number.
- Correspondence and meeting notes.
- Invoicing data (where the contact is also a billing contact).

4.3 References

- Name, role, relationship to the candidate.
- Contact details and the content of the reference conversation, summarised in our notes.

4.4 Website visitors and subscribers

- Data submitted via contact forms or newsletter sign-up (name, email, message).
- Technical and usage data, see our Cookie Statement.

5. Where we get your data

We obtain personal data from several sources:

- Directly from you — when you contact us, send a CV, accept a meeting or subscribe to our mailing list.
- From publicly accessible professional sources — most importantly LinkedIn (including LinkedIn Recruiter), but also company websites, professional registers, conference speaker lists and press articles.
- From our clients — for example when a hiring manager flags an internal candidate or a target person they would like to be approached.
- From references — only those that you, as a candidate, have explicitly named and approved for us to contact.
- From our own search history — your earlier interactions with us may inform a new conversation.

When we approach you for the first time, we will always tell you, at the latest in our first message, where we found you and what we are contacting you about.

6. Why we process your data (purposes)

We process personal data for the following purposes:

- To carry out executive search assignments: identify, approach, assess and present candidates to our clients.
- To build and maintain a relevant talent network in our specialist sectors.
- To advise our clients on the market, on candidate availability and on remuneration.
- To enter into and perform agreements with clients, including invoicing.
- To communicate with candidates, clients and references.
- To send, where appropriate, targeted information about vacancies or market insights.
- To comply with legal obligations (tax, administration, regulatory requests).
- To handle questions, requests and any disputes.
- To improve our website and our service quality.

7. Legal basis for processing

Under the GDPR, we rely on the following grounds, depending on the situation:

7.1 Legitimate interest (Art. 6(1)(f) GDPR)

This is our main legal basis for sourcing and initially contacting candidates. Executive search is by its nature a discreet, proactive activity: it would defeat its purpose if every potential candidate had to give prior consent before being identified for a confidential mandate. We have carefully weighed our legitimate interest — and that of our clients in filling key roles — against your privacy interest, and have built in concrete safeguards:

- We only process professional data, never special categories of data.
- We approach you discreetly and only in a professional context.
- We tell you upfront where we found you and why.
- We do not share your profile with any client until you have explicitly agreed.
- You can object at any time, and we will then stop and either delete or anonymise your data.

7.2 Performance of a contract (Art. 6(1)(b) GDPR)

For client contacts in the context of a search assignment, and for candidates once they enter an active selection process.

7.3 Consent (Art. 6(1)(a) GDPR)

For example for sharing your full profile with a specific client, for taking up named references, for sending a newsletter, or for placing analytics and marketing cookies on our website.

7.4 Legal obligation (Art. 6(1)(c) GDPR)

For example for retaining invoicing data under Dutch and (after our relocation) French tax law, or for responding to lawful requests from competent authorities.

8. Sharing your data with third parties

We share personal data only when it is necessary and lawful. The main categories of recipients are:

- Our clients — only after you, as a candidate, have explicitly agreed that your profile may be shared, and only with the relevant decision-makers within the client organisation.
- Service providers acting on our instructions (processors), such as our IT, hosting, e-mail, calendar and document tools, our administration / bookkeeping platform and our LinkedIn Recruiter environment. They are bound by a data processing agreement.
- Professional advisors (accountant, lawyer) where strictly necessary and under a duty of confidentiality.
- Competent authorities, where we are legally obliged to share data.

We do not sell personal data, and we do not use personal data for purposes that are incompatible with those described in this Privacy Statement.

9. International transfers

e-search is currently established in the Netherlands and is in the process of relocating its operations to France (Ardèche). All data processing takes place primarily within the European Economic Area (EEA).

Some of the tools we use — in particular LinkedIn, Google services, Microsoft / cloud services — are operated by companies established outside the EEA, most notably in the United States. Where personal data is transferred outside the EEA, we ensure an appropriate level of protection through:

- Adequacy decisions of the European Commission, where they apply (including, where applicable, the EU–US Data Privacy Framework).
- Standard Contractual Clauses (SCCs) adopted by the European Commission.
- Additional technical and organisational measures where required.

10. How long we keep your data

We do not keep personal data longer than necessary. The table below sets out our standard retention periods. If a longer retention is required by law, or shorter retention is requested and justified, we will adjust accordingly.

Category of data subject	Retention period	Basis / reasoning
Sourced candidates (passive, contacted but no active process)	Up to 2 years from last meaningful contact, then deleted or re-consented	Legitimate interest in maintaining a relevant talent network for future executive search assignments.
Active candidates (in a running search)	Duration of the assignment + 1 year	Necessary to run the search, document the selection process and respond to follow-up questions from candidate or client.
Placed candidates	7 years after placement (basic file)	Underlying placement / invoice relationship with client; tax and administrative obligations.
Rejected candidates (after presentation or interview)	4 weeks after rejection unless candidate consents to longer retention	Dutch NVP / industry guidance on retention of rejected applicant files.
Reference providers	Duration of the assignment + 1 year	Documentation of the reference check carried out for the client.
Client contact persons	Duration of the relationship + 7 years for invoicing data	Contract performance and statutory retention of accounting records (Dutch / French tax law).

Category of data subject	Retention period	Basis / reasoning
Newsletter / mailing list subscribers	Until you unsubscribe	Consent; you can withdraw at any time.
Website visitors (analytics)	Up to 14 months (Google Analytics)	See our Cookie Statement.

11. Security

We take appropriate technical and organisational measures to protect personal data against loss and unlawful processing, including:

- Access controls and strong, unique passwords with two-factor authentication on critical systems.
- Encryption of data in transit (TLS) and at rest where supported by the platform.
- Limited access on a strict need-to-know basis — in practice, very few people have access to candidate files.
- Confidentiality agreements with anyone who works with us.
- Regular review of our suppliers and of our own working practices.

If a personal data breach occurs that is likely to result in a risk to your rights and freedoms, we will report it to the competent supervisory authority within 72 hours and, where required, inform you directly.

12. Your rights

Under the GDPR, you have a number of rights regarding your personal data. The table below summarises them, with a short note on what each right means in the specific context of executive search.

Your right	What it means in the context of executive search
Access	You can ask us whether we hold personal data about you and, if so, receive a copy of that data, including any assessment notes we have made.
Rectification	You can ask us to correct inaccurate data, for example a wrong job title, employer or salary indication.
Erasure (right to be forgotten)	You can ask us to delete your data when there is no longer a valid reason for us to keep it, for example when you are no longer interested in being contacted for opportunities.
Restriction	You can ask us to pause our processing while a question or dispute is being resolved.

Your right	What it means in the context of executive search
Objection	You have an absolute right to object to processing for direct marketing. You can also object to processing based on our legitimate interest, including being sourced as a candidate. See Section 12.
Data portability	Where applicable, you can receive the personal data you provided to us in a structured, commonly used and machine-readable format.
Withdraw consent	Where we rely on your consent (for example for a newsletter, or to share your profile with a specific client), you can withdraw it at any time.
Lodge a complaint	With the Dutch Data Protection Authority (Autoriteit Persoonsgegevens, autoriteitpersoonsgegevens.nl) or, after our relocation, with the French CNIL (cnil.fr).

Right to object — the most important right for sourced candidates. If you do not wish to be approached by us for executive search opportunities, send us a short message stating this. We will then either delete your data entirely or keep only a minimal “do-not-contact” record (your name and the fact that you have objected) to make sure we do not approach you again by mistake. You do not need to justify your objection.

13. How to exercise your rights

You can exercise any of these rights at any time by contacting us via the contact details on www.e-search.nl. To protect your data, we may ask you to confirm your identity before we act on the request. We will respond within one month; if the request is complex, we may extend this period by two further months and will tell you so.

Exercising your rights is free of charge, unless your request is manifestly unfounded or excessive (for example, repeated identical requests). In that case we may charge a reasonable fee or refuse the request, in line with the GDPR.

14. Complaints

If you believe that we are not handling your personal data correctly, we would very much like to hear from you first — so we can correct any mistake. You also have the right, at any time, to lodge a complaint with a supervisory authority:

- In the Netherlands: Autoriteit Persoonsgegevens (autoriteitpersoonsgegevens.nl).

15. Changes to this Privacy Statement

We may update this Privacy Statement from time to time, for example when our practice evolves, when we adopt new tools, or when laws or guidelines change. The version date at the top of this document always reflects the latest update. Material changes will be highlighted on our website.

16. Contact

If you have any question about this Privacy Statement, about a specific approach we made, or about your data, please contact us via the contact details on www.e-search.nl. We aim to answer personally and substantively — because confidentiality and trust are the foundation of executive search.