



Curran Daly + Associates

EXECUTIVE SEARCH FIRM

16th Floor Tower 6789, Ayala Avenue Bel-Air 1209 City of Makati NCR

<https://www.currandaly.com/>

Data Privacy Policy

1. Purpose

This Data Privacy Policy outlines how Curran Daly and Associates, Inc. ("we", "our", or "us") collects, uses, stores, and protects personal data in compliance with the **Data Privacy Act of 2012 (Republic Act No. 10173)** and its implementing rules and regulations. This policy applies to all individuals whose personal data is collected by Curran Daly and Associates, Inc., including employees, clients, and candidates.

2. Definitions

For the purposes of this policy:

- **Personal Data:** Any information that can be used to identify an individual, either directly or indirectly (e.g., name, contact details, identification numbers).
- **Sensitive Personal Data:** Personal data about an individual's health, sexual orientation, political opinions, religious beliefs, etc.
- **Processing:** Any operation or set of operations performed on personal data (e.g., collection, storage, use, sharing).
- **Data Subject:** The individual to whom the personal data relates.

3. Scope

This policy applies to:

- Personal data collected in the course of providing goods, services, and recruitment (including sensitive personal data) from employees, clients, suppliers, contractors, and candidates.
- Processing of personal data for any purpose that is lawful and necessary for business operations.

4. Data Collection

We collect personal data through:

- **Direct Collection:** Personal data that you provide to us, including but not limited to application forms, contracts, or communication.
- **Indirect Collection:** Personal data received from third-party sources, such as publicly available databases or references.

In the course of our recruitment operations, we collect personal and sensitive personal information necessary to evaluate a candidate's qualifications and suitability for potential employment. This includes, but is not limited to:



Curran Daly + Associates EXECUTIVE SEARCH FIRM

16th Floor Tower 6789, Ayala Avenue Bel-Air 1209 City of Makati NCR

<https://www.currandaly.com/>

- Name, contact details, employment and educational background, references, and assessment scores;
- Employment details, education, and professional background
- Sensitive data (if applicable and necessary), including health, religious beliefs, or political affiliation, with explicit consent
- Video and audio recordings of candidate interviews conducted via secure third-party platforms (e.g., Hireflix), used strictly for recruitment evaluation and internal review;
- Any other information voluntarily provided by the candidate that may support the recruitment process.

The recordings are collected with the explicit consent of the data subject and are processed under the lawful basis of legitimate interest and/or performance of pre-contractual measures at the request of the data subject.

5. Use of Personal Data

The personal and sensitive personal information collected will be used solely for:

- Assessing suitability for employment opportunities;
- Facilitating internal client reviews;
- Documenting candidate responses to maintain an accurate and fair hiring process;
- Complying with legal obligations and client audit requirements, if applicable.

6. Data Sharing

We may share personal data in the following circumstances:

- **With service providers:** We may disclose personal data to third-party service providers for purposes such as IT support, marketing, or business administration. These providers are obligated to protect your personal data and use it only as necessary for the services they provide.
- **To comply with legal obligations:** We may disclose personal data to comply with applicable laws, regulations, or legal processes.
- **With our clients (for recruitment):** If processing personal data for recruitment, we may share your data with clients, only for the purpose of recruitment and staffing services.

We do not sell, lease, or otherwise disclose personal data to any other third party unless authorized by you or required by law.

7. Data Retention

CDA retains candidate data, including recordings, only for as long as necessary to fulfill the stated purposes or as required by applicable laws or regulations. Candidates may request access, correction, or deletion of their data at any time, subject to limitations under the law.



Curran Daly + Associates EXECUTIVE SEARCH FIRM

16th Floor Tower 6789, Ayala Avenue Bel-Air 1209 City of Makati NCR

<https://www.currandaly.com/>

8. Data Protection and Security

All data, including video and audio recordings, are stored securely using industry-standard encryption protocols. Access is limited to authorized personnel on a strict need-to-know basis. CDA partners only with third-party platforms compliant with the Data Privacy Act of 2012 and subject to appropriate data sharing agreements and safeguards.

9. Data Subject Rights

Under the Data Privacy Act, data subjects have the following rights:

- **Right to Access:** You have the right to access the personal data we hold about you.
- **Right to Correct:** You may request that we correct any inaccuracies or incomplete data.
- **Right to Object:** You may object to the processing of your personal data under certain circumstances.
- **Right to Erasure or Blocking:** You may request the deletion or blocking of your personal data when it is no longer necessary or if you withdraw consent.
- **Right to Data Portability:** You have the right to request that your personal data be transferred to another provider in a structured and commonly used format.
- **Right to File a Complaint:** If you believe that your data privacy rights have been violated, you may file a complaint with the **National Privacy Commission**.

10. Consent

We will obtain explicit consent before collecting sensitive personal data and for processing activities beyond the purposes outlined in this policy. If you wish to withdraw your consent at any time, you may do so by notifying us in writing. Please note that withdrawal of consent may impact our ability to provide certain services or carry out certain obligations.

11. Children's Privacy

We do not knowingly collect or process personal data from individuals under the age of 18. If we discover that personal data has been collected from a minor, we will take steps to delete such data promptly.

12. Updates to the Privacy Policy

We reserve the right to update or modify this Data Privacy Policy at any time to reflect changes in legal, operational, or business practices. Any changes will be communicated to data subjects via our website or other means of communication.



Curran Daly + Associates
EXECUTIVE SEARCH FIRM

16th Floor Tower 6789, Ayala Avenue Bel-Air 1209 City of Makati NCR
<https://www.currandaly.com/>

13. Contact Information

If you have any questions or concerns about this Data Privacy Policy, or wish to exercise your rights as a data subject, please contact us at:

Curran Daly and Associates, Inc.
16th Floor Tower 6789, Ayala Avenue Bel-Air 1209 Makati City Philippines
(02) 8863 6835
DPO: Honey de los Reyes (financeadmin@currandaly.com)

For more information on data protection in the Philippines, please refer to the **National Privacy Commission (NPC)** website: <https://www.privacy.gov.ph/>

Prepared by	Honey de los Reyes	29 MAY 2025
Reviewed and Approved by	Geoff Daly	29 MAY 2025