Privacy Policy for Apex Executive Partners

Last Updated: July 28, 2025

Apex Executive Partners, a trading name of MVBR Consulting ("we," "us," or "our") is committed to protecting the privacy and security of your personal data. This Privacy Policy explains how we collect, use, store, and share your personal data when you visit our website at https://apexexecpartners.com/ or engage with our business consultancy services.

As a UK-registered business, we comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Given our international client base, we also adhere to principles that align with global data protection standards.

1. Who We Are

Apex Executive Partners is a business consultancy firm based in the United Kingdom, specialising in commercial and operational growth for innovative, technology-focused organisations, including startups and private equity-backed ventures.

Our Contact Details:

Apex Executive Partners

85 Great Portland Street, First Floor, London, England, W1W 7LT

Email: info@apexexecpartners.com

2. The Data We Collect About You

We may collect, use, store, and transfer different kinds of personal data about you, which we have grouped together as follows:

- Identity Data: Includes first name, last name, title, company name, job title.
- Contact Data: Includes billing address, email address, telephone numbers.
- Technical Data: Includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Usage Data: Includes information about how you use our website, products, and services.
- Marketing and Communications Data: Includes your preferences in receiving marketing from us and your communication preferences.
- Professional Data (for clients/candidates): Information relevant to consultancy engagements, such as company structure, financial information (for clients), CVs, professional history, qualifications, and references (for recruitment-related services).

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect information about criminal convictions and offences.

3. How Your Personal Data is Collected

We use different methods to collect data from and about you, including:

- Direct Interactions: You may give us your Identity, Contact, and Professional Data by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:
 - Enquire about our services.
 - Engage us for consultancy services.
 - Provide us with feedback.

- Apply for a role (if applicable).
- Automated Technologies or Interactions: As you interact with our website, we may
 automatically collect Technical and Usage Data about your equipment, browsing actions, and
 patterns. We collect this personal data by using cookies, server logs, and other similar
 technologies. Please see our Cookie Policy [if separate, otherwise mention here] for more
 details.
- Third Parties or Publicly Available Sources: We may receive personal data about you from various third parties and public sources, such as:
 - Technical Data from analytics providers (e.g., Google Analytics).
 - Contact, Identity, and Professional Data from publicly available sources (e.g., LinkedIn, company websites) for business development purposes where there is a legitimate interest.

4. How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with vou.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Where we have your consent to do so.

Purposes for which we will use your personal data:

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Purpose/Activity	Type of Data Collected	Lawful Basis for Processing (UK GDPR)
Purpose: To outline the terms of the strategic partnership for the recruitment service.	Identity Data: Your name, title	Performance of Contract: To define the terms of our agreement.
Data Collected: Your contact information.	Contact Data: Email, phone number	Legitimate Interests: To communicate effectively regarding our services.
How Collected: Direct interaction via email or phone.	Professional Data: Your role, company	Consent: Where you explicitly agree to receive our communications.
Purpose: To define the fee structure and payment terms for the recruitment service.	Financial Data: Payment schedule	Performance of Contract: To ensure proper invoicing and payment for services rendered.
How Collected: Direct interaction during contract negotiation.	Remuneration Data: Candidate's agreed salary	Performance of Contract: To calculate the final fee based on agreed terms.
Purpose: To outline the candidate guarantee period and conditions.	Candidate Data: Placement details	Performance of Contract: To fulfill the terms of the guarantee.
How Collected: Information from the recruitment process.	Client Data: Notification of cessation of employment	Legitimate Interests: To manage the guarantee process efficiently.
Purpose: To ensure confidentiality of information exchanged.	All Data Types	Legal Obligation: To comply with data protection laws.
How Collected: Through all interactions.		Legitimate Interests: To protect sensitive business information.

Purpose: To establish exclusivity for the recruitment search.	Engagement Data: Dates of exclusivity	Performance of Contract: To define the scope of the recruitment engagement.
How Collected: Direct interaction during contract negotiation.		Legitimate Interests: To ensure dedicated service provision.
Purpose: To comply with legal and regulatory obligations.	All Data Types	Legal Obligation: To adhere to applicable laws and regulations (e.g., UK GDPR, DPA 2018).
How Collected: As required by law.		Legitimate Interests: To operate our business lawfully and responsibly.

5. How We Share Your Personal Data

We may share your personal data with the following categories of recipients:

- Our Associates/Consultants: To facilitate the delivery of our consultancy services. All associates are bound by strict confidentiality agreements.
- Professional Advisers: Including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance, and accounting services.
- HM Revenue & Customs, regulators, and other authorities: Where legally required to report processing activities.
- Third-party service providers: Who provide IT and system administration services, such as website hosting, email services, and CRM platforms.
- Prospective Buyers/Sellers: In the event of a merger, acquisition, or asset sale, we may disclose your personal data to the prospective buyer or seller of such business or assets.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International Transfers

As we serve international clients, particularly in Dubai and Mumbai, it may be necessary to transfer your personal data outside the UK/EEA to facilitate our services.

Whenever we transfer your personal data out of the UK/EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK government or European Commission.
- Where we use certain service providers, we may use specific contracts approved for use in the UK (and/or EU) which give personal data the same protection it has in the UK (and/or EU).
- Where we transfer data to the US, we may transfer data to them if they are part of the Data Privacy Framework which provides similar protection to personal data shared between the UK/EU and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK/EEA.

7. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your

personal data, the purposes for which we process your personal data and whether we can achieve

9. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Reguest access to your personal data (commonly known as a "data subject access reguest").
- Request correction of the personal data that we hold about you.

those purposes through other means, and the applicable legal requirements.

- Request erasure of your personal data.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- Request restriction of processing of your personal data.
- Request the transfer of your personal data to you or to a third party.
- Withdraw consent at any time where we are relying on consent to process your personal data.

If you wish to exercise any of the rights set out above, please contact us using the details provided in Section 1.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

10. Cookies

Our website may use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them, please refer to our [Cookie Policy - if you have a separate one, otherwise integrate here].

11. Changes to This Privacy Policy

We keep our Privacy Policy under regular review. Any changes we make to our Privacy Policy in the future will be posted on this page. We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your information.