

THE SEARCH CLUB

PRIVACY POLICY

TSC Group LLC, doing business as The Search Club

Effective Date: August 1, 2026

1. Scope and Identity

This Privacy Policy explains how TSC Group LLC, doing business as The Search Club (“The Search Club,” “we,” “us,” or “our”), collects, uses, discloses, retains, and protects personal information in connection with www.thesearchclub.com (the “Site”), membership inquiries and applications, communications, and our executive talent advisory, executive intelligence, executive search, assessment, market-mapping, and related services (collectively, the “Services”).

This Policy applies to information collected online and, where relevant, through direct business interactions. Separate client, member, candidate, confidentiality, or services agreements may contain additional privacy or confidentiality terms. If those terms conflict with this Policy, the applicable signed agreement controls for that relationship.

2. Categories of Information We Collect

Information you provide directly

- Identifiers and contact information, such as name, business email address, telephone number, mailing address, company, and professional title;
- Professional and business information, such as employment history, executive experience, areas of expertise, biography, resume or curriculum vitae, compensation information when relevant, professional interests, and organizational responsibilities;
- Membership, inquiry, and engagement information, including information submitted in an application, request, questionnaire, survey, meeting request, or other communication;
- Communications and relationship records, including emails, messages, meeting notes, preferences, feedback, and records of interactions with us;
- Transaction and billing information if you purchase Services, such as billing contacts, invoices, payment status, and limited transaction details. Payment processors may collect payment-card or bank credentials directly; we do not store full payment-card numbers, CVV codes, or bank-account credentials on our systems; and
- Any other information you choose to provide.

Information collected automatically

- Device and technical information, such as Internet Protocol address, browser type, device type, operating system, internet service provider, and device or cookie identifiers;
- Usage information, such as pages viewed, referring and exit pages, links selected, dates and times of visits, approximate location derived from an IP address, and Site performance or interaction data; and
- Cookie and similar-technology information described in Section 7.

Information from other sources

In providing the Services, we may receive professional or business-related information from clients, members, candidates, executives, referrals, business partners, service providers, publicly available sources, company websites, government records, professional networking services, industry publications, and executive or talent research databases. This may include professional contact information, employment history, board service, education, published work, professional reputation, and other information relevant to an authorized engagement.

Sensitive information

The general Site is not designed to collect highly sensitive personal data. Please do not submit Social Security numbers, government identification numbers, financial-account credentials, medical information, precise geolocation, biometric identifiers, or other sensitive information through a general Site form unless we specifically request it and you are authorized to provide it. Where applicable law requires consent to process sensitive data, we will seek consent or another lawful authorization before doing so.

3. Purposes for Which We Use Information

We may use personal information to operate, maintain, secure, and improve the Site and Services; respond to inquiries, schedule meetings, evaluate membership applications, and communicate with prospective and current members, clients, candidates, executives, and business contacts; provide executive talent advisory, intelligence, search, assessment, market mapping, benchmarking, integration, and related Services; identify, research, evaluate, and introduce executives or candidates for authorized engagements; manage relationships, deliver reports, administer engagements, and maintain records; process transactions, invoices, and accounting records; send administrative and, where permitted, promotional communications; analyze Site use and performance; detect and respond to fraud, misuse, security incidents, or legal claims; comply with legal, regulatory, tax, accounting, and contractual obligations; and carry out other purposes disclosed at collection or with consent. We seek to limit collection and use to information that is adequate, relevant, and reasonably necessary for the disclosed purposes.

4. How We Disclose Information

We may disclose personal information to service providers and processors that support hosting, cloud storage, cybersecurity, analytics, email, communications, scheduling, customer relationship management, document management, payments, accounting, research, and other business operations; to clients, members, and authorized engagement participants when reasonably necessary to provide requested Services or otherwise authorized; to professional advisers, insurers, auditors, accountants, and attorneys when reasonably necessary for professional advice, risk management, compliance, or protection of legal rights; to government authorities, courts, regulators, or law enforcement when required by law or reasonably necessary to protect rights, safety, security, property, or the integrity of our business; and to a buyer, investor, lender, or successor in connection with a proposed or completed merger, acquisition, financing, restructuring, sale of assets, or similar transaction, subject to appropriate safeguards. We may also disclose information at your direction, with your consent, or as described at collection, and may use and disclose aggregated or de-identified information subject to applicable law.

5. Sale, Targeted Advertising, and Automated Profiling

The Search Club does not sell personal data for monetary or other valuable consideration as “sale” is defined by the Delaware Personal Data Privacy Act. We do not process personal data for cross-context targeted advertising, and we do not use solely automated profiling to make decisions that produce legal or similarly significant effects concerning consumers. If our practices materially change, we will update this Policy and provide any notice, consent, or opt-out mechanism required by applicable law before beginning the new practice.

6. Communications and Marketing Choices

You may unsubscribe from promotional emails by using the unsubscribe instructions in the message or by contacting us. We will process opt-out requests within ten (10) business days. We may continue to send non-promotional communications relating to inquiries, applications, engagements, transactions, security, legal notices, or ongoing relationships.

7. Cookies, Analytics, Do Not Track, and Cross-Site Collection

The Site may use cookies, pixels, tags, log files, local storage, and similar technologies to operate the Site, remember preferences, understand Site activity, improve performance, and protect security. Some technologies are placed by service providers. You may adjust browser settings to block or delete cookies, though some features may not function properly if cookies are disabled. Where required by law, we will provide additional cookie choices or obtain consent before using non-essential technologies. Because there is no uniform standard for browser “Do Not Track” signals, the Site does not currently respond to them, but we will honor legally recognized universal opt-out preference signals where required. Because we do not sell personal data or process it for targeted advertising, an opt-out signal should not change our current practices.

8. Reviewing and Correcting Information

You may request to review, correct, or update personal information you submitted through the Site by emailing access@thesearchclub.com. We may need to verify your identity and authority before acting. We may retain information when required by law, necessary for legitimate business records, subject to a legal hold, or protected by another person's rights, confidentiality, or trade secrets.

9. Delaware Residents

When the Delaware Personal Data Privacy Act applies, Delaware residents acting in an individual or household context have the rights, subject to verification and statutory exceptions, to confirm and access their personal data; to correct inaccuracies; to delete personal data; to obtain a portable copy of data processed by automated means; to obtain a list of the categories of third parties to which we disclosed their personal data; and to opt out of the sale of personal data, targeted advertising, and qualifying solely automated profiling.

Delaware law generally excludes individuals acting solely in a commercial or employment context from the definition of “consumer.” Even where a statutory right does not apply, we will consider a verified request concerning personal information we maintain, subject to applicable law, contractual obligations, confidentiality duties, trade-secret protections, and other lawful exceptions.

How to submit a request

Email access@thesearchclub.com with the subject line “Delaware Privacy Request.” Include your name, the email address associated with your interactions with us, your state of residence, the right you wish to exercise, and enough information for us to identify relevant records. We will use commercially reasonable methods to verify identity and authority. An authorized agent may submit an opt-out request on a consumer's behalf, subject to reasonable verification. Where the Act applies, we will respond without undue delay and ordinarily within 45 days, and may extend by up to 45 additional days when reasonably necessary. Requests are generally free once during a 12-month period.

Appeals

If we decline to act on a covered Delaware request, you may appeal by emailing access@thesearchclub.com with the subject line “Privacy Appeal” and explaining the basis. We will provide a written appeal decision within 60 days where required. If an appeal is denied, Delaware residents may contact the Delaware Department of Justice at privacy@delaware.gov or use the Department's online privacy complaint mechanism.

Non-discrimination

We will not unlawfully discriminate against a consumer for exercising an applicable privacy right.

10. California Residents

This Section addresses The Search Club's obligations to California residents under the California Online Privacy Protection Act (CalOPPA).

The categories of personal information we collect, and the categories of third parties with which we share it, are described in Section 2 (Categories of Information We Collect) and Section 4 (How We Disclose Information). California residents may review, correct, or update personal information they submitted through the Site as described in Section 8 (Reviewing and Correcting Information).

As described in Section 7, the Site does not currently respond to browser “Do Not Track” signals because there is no uniform standard for them, and we will honor legally recognized universal opt-out preference signals where required. The Search Club does not use the Site to knowingly allow third parties to collect personally identifiable information about a California resident's online activities over time and across different websites for cross-context behavioral advertising.

We notify California residents of material changes to this Policy as described in Section 16 (Changes to This Privacy Policy). The effective date at the top of this Policy identifies the current version.

California residents may submit questions or requests under this Section by emailing access@thesearchclub.com with the subject line “California Privacy Request.” We may need to verify identity and authority before responding.

11. Data Retention

We retain personal information for as long as reasonably necessary for the purposes described in this Policy, including providing Services, managing professional relationships, maintaining business and financial records, preserving appropriate search and engagement records, resolving disputes, enforcing agreements, protecting legal rights, and complying with legal, tax, regulatory, and contractual obligations. Retention periods vary depending on the nature of the information, the relationship, contractual requirements, legal obligations, risk considerations, and legal holds. When information is no longer reasonably necessary, we may delete, anonymize, or securely dispose of it.

12. Data Security and Breach Response

We use reasonable administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, acquisition, use, alteration, disclosure, or destruction. Safeguards are selected in light of the nature and volume of information and may include access controls, vendor management, authentication, secure storage, backups, and incident-response procedures.

No transmission method, system, or storage environment is completely secure. We therefore cannot guarantee absolute security. If a security incident triggers a legal notification obligation, we will provide notice as required by applicable law. Where a signed membership, services, or confidentiality agreement

sets specific data-security or breach-notification obligations, those obligations apply in addition to this Policy.

13. Confidentiality of Client, Member, Candidate, and Executive Information

We treat established membership, client engagements, executive information, candidate information, search activity, assessments, talent intelligence, and related communications as confidential in accordance with applicable agreements and law. We disclose such information only as reasonably necessary to provide authorized Services, as directed or permitted by the relevant party, to protect legal rights and security, or as required by law. The confidentiality and data-handling terms of any signed membership, search, or services agreement apply in addition to this Section. A general Site inquiry or unsolicited submission does not, by itself, create a confidential, fiduciary, advisory, or attorney-client relationship.

14. Children's Privacy

The Site and Services are intended for adults and professional users. The Site is not directed to children, and we do not knowingly collect personal information from children under 13, consistent with the Children's Online Privacy Protection Act (COPPA), 15 U.S.C. Sections 6501-6506, and its implementing regulations at 16 C.F.R. Part 312. We do not knowingly collect, use, or disclose personal information from a child under 13 without verifiable parental consent. If we learn that we have collected personal information from a child under 13 without the required consent, we will delete that information promptly. The Site is intended for individuals 18 years of age or older. If a person under 18 submits personal information through the Site, we will use that information only to notify the individual that they are not eligible to use the Site and then delete it.

15. Third-Party Websites and Services

The Site may contain links to third-party websites, platforms, applications, or services. We do not control and are not responsible for their privacy, security, content, or practices. Review the privacy notices of third parties before providing information to them.

16. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. The effective date at the top identifies the current version. We will post the revised Policy on the Site, and if a change is material we may also provide a prominent Site notice, email notice where appropriate, or another reasonable form of notice before or when the change takes effect. For any material change, we will provide notice at least fourteen (14) days before the change takes effect. We will obtain consent before using previously collected personal information for a materially different purpose when applicable law requires consent.

17. Contact Us

The Search Club | TSC Group LLC | Lewes, Delaware | access@thesearchclub.com | www.thesearchclub.com