

## We are Belsberg

We process personal data – that is information about individuals. In this Privacy Notice we explain how.



### All relevant information in a nutshell:

- We are the main decision-maker regarding the processing of personal data explained in this Privacy Notice.
- We process personal data of:
  - clients or potential clients.
  - consultants or potential consultants.
  - people who contact us, via the website or via social media pages.
  - job candidates.
  - business contacts (e.g. people who work for our suppliers).
- We use and keep personal data to do our business.
- To support us in our business, we engage third parties to process personal data on our behalf. We remain responsible for the protection of the personal data processed by these third parties.
- We may also share personal data with third parties that use it for their own purposes.
- We may transfer personal data to parties outside the European Economic Area, but take measures to keep it protected.
- We may update our Privacy Notice from time to time.
- You have rights regarding your personal data, and you can file a complaint with the supervisory authority if you believe we treat your personal data wrongly.

Want to get into the details? We explain everything below.

Questions? Feel free to contact our privacy officer at [legal@belsberg.com](mailto:legal@belsberg.com).

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**Belsberg is the main decision-maker regarding the processing of personal data as explained in this Privacy Notice.** We decide why and how personal data is collected and used. In terms of the General Data Protection Regulation (the GDPR), we are the 'controller'.

### We process personal data of clients or potential clients

We use	<ul style="list-style-type: none"> <li>• contact details of our contact person(s) at the client</li> <li>• information included in extracts from the Chamber of Commerce</li> <li>• banking details</li> </ul>
We use this data to	<ul style="list-style-type: none"> <li>• correspond with our clients and provide our services</li> <li>• to verify signing authority</li> <li>• to send invoices to our clients and keep records</li> <li>• to invite our clients to knowledge sessions (meet-ups)</li> <li>• to further develop and improve our services</li> </ul>
We can do this because	<ul style="list-style-type: none"> <li>• we have a <u>legitimate interest</u> in doing so. This specifically relates to the processing of personal data of the contact person(s) at the clients and to maintain and improve our services. In short, we have this legitimate interest because we cannot do our job properly if we cannot process this personal data.</li> <li>• we need this personal data to <u>perform our agreements</u> with clients, or to enter in such agreements</li> <li>• we are <u>required by the law</u> to do so</li> <li>• we have a <u>consent</u>. This specifically relates to the processing of personal to invite the contact person for knowledge sessions.</li> </ul>
We do this	<p><u>up to five (5) years</u> after the cooperation with the client has ended</p>

### We process personal data of consultants or potential consultants

We use	<ul style="list-style-type: none"> <li>• contact details of consultant</li> <li>• personal data of consultant included in correspondence with consultant or client</li> <li>• personal data included in the consultant file, such as: <ul style="list-style-type: none"> <li>○ performed and potential assignments,</li> <li>○ availability,</li> <li>○ invoicing and banking details,</li> <li>○ information included in extracts from the Chamber of Commerce</li> <li>○ feedback received from consultant and client,</li> <li>○ work-related online profiles, such as LinkedIn</li> <li>○ information obtained in the application procedure, such as the motivation letter and curriculum vitae</li> <li>○ Only in case we are required by law, we register the personal identification number (<i>BSN-nummer</i>) of the consultant.</li> </ul> </li> </ul>
We use this data to	<ul style="list-style-type: none"> <li>• correspond with our consultant</li> <li>• determine the suitability of the consultant for a specific assignment</li> <li>• present our consultant to our client and keep them informed about the consultant</li> <li>• to provide our consultant with feedback for training and development</li> <li>• to invite our consultants to knowledge sessions (meet-ups)</li> <li>• to process invoices of consultants and keep records</li> <li>• to fulfill legal obligations</li> </ul>
We can do this because	<ul style="list-style-type: none"> <li>• we need this personal data to <u>perform our agreements</u> with consultants, or to enter in such agreements</li> <li>• we are <u>required by the law</u> to do so</li> </ul>

We do this	<ul style="list-style-type: none"> <li>we have a <u>legitimate interest</u> in doing so. Because we cannot do our job properly if we cannot process this personal data.</li> </ul>
	<u>up to two (2) years</u> after the cooperation with the client has ended

**We process personal data of people who contact us, via the website or via social media pages**

We use	<ul style="list-style-type: none"> <li>contact details of the sender</li> <li>any other personal data included in the message</li> </ul>
We use this data to	<ul style="list-style-type: none"> <li>respond to the message</li> <li>further develop and improve our services in response to message</li> </ul>
We can do this because	<p>we have a <u>legitimate interest</u> in doing so. In short, we have this legitimate interest because we need to process this personal data to contact and help people based on their comment or question and to improve our services in response to the questions and feedback we receive.</p>
We do this	<u>as long as necessary</u> to handle the message. Information made public on social media pages can often be deleted by the user itself.

**We process personal data of job candidates or potential job candidates (for internal positions, or for positions of clients)**

We use	<ul style="list-style-type: none"> <li>contact details</li> <li>personal data provided by candidate, such as CV and motivation letter</li> <li>work-related online profiles, such as LinkedIn</li> <li>data evidenced by a (possible) social media research</li> <li>notes taken during the interview</li> </ul>
We use this data to	<ul style="list-style-type: none"> <li>actively recruit for potential candidates</li> <li>correspond with the candidate</li> <li>determine the suitability of the candidate</li> </ul>
We can do this because	<p>we have a <u>legitimate interest</u> in doing so. In short, we have this legitimate interest because we need this data to actively inform the candidate about a position that might be of interest to him/her, and for an adequate application process.</p> <p>If the candidate provides us with additional personal data or special categories of data, we process this personal data based on consent or explicit consent of the candidate. The candidate is not required to provide such information.</p>
We do this	<u>Up to four (4) weeks after the application process has ended</u> , unless we have consent from the candidate to keep the data for <u>one (1) year</u>

**We process personal data of business contacts (e.g. people working for our suppliers)**

We use	<ul style="list-style-type: none"> <li>contact details</li> <li>information relevant to the business relation, such as correspondence</li> </ul>
We use this data to	<ul style="list-style-type: none"> <li>correspond with business contacts about their services</li> <li>process invoices of suppliers and keep records</li> </ul>
We can do this because	<ul style="list-style-type: none"> <li>we have a <u>legitimate interest</u> in doing so. This specifically relates to the personal data of the employees of our suppliers. In short, we have this legitimate interest because we cannot properly cooperate with the supplier if we cannot process this personal data.</li> <li>we are <u>required by the law</u> to do so</li> <li>we need this personal data to <u>perform our agreements</u> with the suppliers, or to enter in such an agreement</li> </ul>

We do this

as long as necessary for the above purposes and a reasonable time thereafter, e.g. to keep track of our rights and obligations.

Not all abovementioned data always qualifies as personal data. For example banking details and invoices.

**Some personal data are required to provide our services.** Or to enter into an agreement. We may also be required by law to have this personal data. If the relevant personal data is not provided, we cannot provide our services.

**We sometimes may keep personal data longer than the retention period mentioned in this notice.** We only do this if this is necessary to comply with legal retention obligations, fraud/abuse investigations or to substantiate a claim or legal claim.

Furthermore, data is generated automatically. See the **Cookie Statement** for further information on this.

**We engage third parties to process personal data on our behalf.** We remain responsible for the protection of personal data processed by these third parties. We use these third parties for:

- e-mail management and communication,
- data storage,
- invoicing,
- accounting,
- customer relation management, and
- sending newsletters.

**We may also share personal data with third parties that use it for their own purposes.** That means that after we have shared the personal data with these third parties, they are responsible for protecting the personal data themselves. To know how these parties handle personal data, you can check their privacy notices. We share personal data with:

- **Clients:** Only in the context of a specific assignment, for example to present a candidate to a client, or for the execution of an assignment.
- **Suppliers:** Only if this is necessary to handle the case. For example, legal consultants, insurers, courts, administrative bodies, government agencies and similar parties.
- **Tax authorities:** Only the personal data we are legally obliged to share. We are required by law to include (some) personal data in our financial records, which may have to be shared with the tax authorities.
- **Bank:** Only in order to transfer and/or receive payments.

Other than that, we only share personal data with third parties if we are legally obliged to do so, because we have obtained consent for it, or because an exceptional circumstance applies. Exceptional circumstances apply when this is necessary for the protection of our own interests or those of third parties, if this is necessary in the context of legal proceedings, and if this is necessary in the context of a sale or merger or other transaction regarding our company.

**We may transfer personal data to parties outside the European Economic Area.** We only transfer personal data to parties outside the European Economic Area (the European Union, Norway, Iceland, Liechtenstein) if the personal data is adequately protected by the laws of the relevant country or if we

have contractual safeguards in place. Read more about the countries with an adequate level of data protection [here](#). Read more about the [contractual safeguards](#) here. If you want more information about this or a copy of the specific safeguards that are in place, you can contact us through the contact details and the top of this Privacy Notice.

**We may update this Privacy Notice from time to time.** This is because we are constantly looking for ways to improve our services and website. If we change the Privacy Notice in any significant way, we will post a notice on our website, along with the updated Privacy Notice or contact you about it (whichever is most appropriate in the particular case).

**You have rights regarding your personal data, described in the overview below.** You can exercise your rights by contacting us. We may ask additional data from you, e.g. to verify your identity.

**These rights are not absolute.** For example, we may decide to not fully fulfill your request because that is necessary to protect the rights and freedoms of others or for the establishment, exercise or defense of legal claims. If such a situation arises, we will inform you.

**You can file a complaint with your national data protection authority if you believe we are not handling your personal data properly.** You can find a list of the European data protection authorities, their websites and contact details [here](#).

## You have the right to...



### Access

You can request us to access and receive a copy of your personal data, and other supplementary information.



### Data portability

You can request us to provide your personal data in an easy-to-use format, so you can reuse it somewhere else.



### Rectification

You can request us to correct your personal data if it is incorrect or incomplete.



### Restriction of processing

You can request us to block the further use of your personal data. We then may still store the personal data, but not use it.



### Erasure

You can request us to delete your personal data. This right is also known as "the right to be forgotten".



### Withdraw your consent

We then stop using your data for the purpose we asked your consent for. This does not affect the legality of previous or other use of your personal data.



If we use your personal data based on our legitimate interest or for direct marketing, you also have the right to **object**.