

Privacy Policy

1. Introduction

As specialists in the selection and recruitment of IT profiles, we are responsible for the processing of many data among which some are personal data.

As a customer or as a sub-contractor of our company, these personal data can concern you. This Privacy Policy lists your legal rights and obligations. Consequently, we ask you to read carefully the following.

2. Definitions

- **“personal data”**: any piece of information concerning an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person).
- **“(data) processing”**: any operation or any set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **“Controller” or “responsible for data processing”**: a natural or legal person determining the purposes and means of the processing of personal data.
- **“Representative”**: a natural or legal person, designated by the Controller in writing and who represents the Controller with regards to the latter’s obligations under the GDPR.
- **“Processor” or “sub-contractor”**: a natural or legal person processing the data on behalf of the Controller.
- **“Profiling”**: any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person’s performance at work, economic situation, health, personal references, interests, reliability, behavior, location or movements.

3. Who is responsible for data processing?

The legal person responsible for your personal data or Controller (hereinafter referred to as « Talencia Consulting » or as “we”), is :

Talencia Consulting SPRL

Headquarters’ address : Rue de Verdun 750, 1130 Bruxelles

Company number : 0502.698.441

Tel. : +32 2 245 72 45

Email: sales@talencia.eu

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The representative of the Controller is Mr Ilyesse Maouan, also Managing Director of Talencia Consulting.

You can address all questions related to personal data protection to our Data Protection Officer, **Sarah Lecomte**, either per post mail at Talencia Consulting's Headquarters' address (see above), or per email via dpo@talencia.eu.

Being responsible for data processing, our company is bound to abide by the Data Protection Regulations for all data processing aims that it has defined. Our company is responsible for the processing of, namely, its customers', prospects' or partners' personal data.

4. Data processing purposes

Our company, that is the Controller, processes personal data for the following purposes:

a) To identify you

b) To communicate with you

When in contact with our office, you might be required to communicate to us some of your personal data. This data enables us to manage your requests and to answer to your questions. And any communication between us may be saved in our system.

c) To deliver our services to our clients and candidates/consultants

- Your email address to send you news in writing and/or your telephone number to contact you more directly and verbally.
- Your name and first name to address you correctly.
- Information that you provide us in your resume and cover letter: your professional experiences, your education and training, so that the job offers, for which we contact you, are the most suited to your professional profile.
- To keep you informed about the candidates/consultants available or looking for a job.
- To manage and further develop our professional relationship with you.

We also collect information about how you browse our website using cookies and similar technologies. Please review our Cookie Policy for more information about why and how we use cookies (see article 10 below).

5. Categories of data subjects and categories of personal data

Pursuing the purposes listed under article 4 hereabove, our company is authorized to process personal data from the following categories of data subjects:

- Customers: legal entities calling upon Talencia Consulting's services for their own recruitment needs or for the recruitment needs of their clients.
- Consultants: natural persons, performing specific services requested by the customers on behalf of Talencia Consulting's sub-contractors.
- Candidates: candidate interested by job offers.

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For each of the above data subjects, our company processes the following categories of personal data :

Data subjects	Categories of personal data collected
Customers	Name, first name, Phone number, email address, company postal address
Candidates	Name, first name, Phone number, email address, postal address, picture (when included in the cv), email address, postal address, Curriculum vitae information's (Professional experiences, Studies, Trainings, certifications, etc.)
Consultants	ID Card, Phone number, picture (when included in the cv), email address, postal address, Curriculum vitae information's (Professional Experiences, Studies, Trainings, certifications, etc.)

Our company also processes personal data that has not been delivered by the concerned data subjects, such as personal data communicated by Customers or Service Suppliers and concerning their staff members, their administrators, their end-clients, their shareholders.

Personal data in our possession can also come from public sources such as *la Banque-Carrefour des Entreprises, le Moniteur belge and its appendices, and la Banque nationale de Belgique (Centrale des Bilans)* or the social networks (*Linkedin, etc.*).

Only those personal data required for pursuing the purposes listed in article 4 are processed.

Personal data will be kept by us for maximum 2 years. Should some of your personal data change, please keep us informed as soon as possible so that we can go on pursuing our data processing purposes, that is to go on serving you.

Personal data in our possession is not transferred to a third country or an international organization.

6. Legitimate interests

Article 6.1 of the GDPR defines legitimate interests pursued by the Controller as a lawful ground of data processing, except where such interests are overridden by the interests, rights or freedoms of the data subjects.

The term « legitimate interests » refers to the stake that the company processing the personal data may have in the processing. This may imply a benefit inherent in processing for that company itself or perhaps for wider society. In other words, we, the Controller, would probably not be able to carry out properly our missions of selection and recruitment if we did not collect and process the required personal data from our customers, candidates and consultants.

However, should have any objections as to certain processing of your personal data, please contact us. Before doing so, we invite you to read article 10 below describing all your rights under the GDPR.

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7. Data transfer to third parties

Unless necessary to communicate personal data to organizations or entities for the pursue of the listed purposes, our company will neither share, transfer, sell, distribute, exchange the collected personal data to or with any organization or entity without your prior written consent.

Our company calls upon the support of the following partners:

- A **CRM software** for the management of our Customers' and Service Suppliers' data, situated in Great-Britain;
SAS OVH, host of our new website, situated rue Kellermann 2, BP 80157 à 59100 Roubaix, France;
- **CloudVPS B.V.** hosting our CRM and our former website, situated Oostmaaslaan 71, 3063 AN Rotterdam, Holland.

The hereabove listed partners are reliable and ensure a sufficient security level for protecting our data and the data of our Customers and Service Suppliers.

Our company is able to take all necessary measures to guarantee a good management of our website and our computerized system.

Our company is authorized to transfer personal data either on request of any legally competent authority, or on its own initiative if it considers in good faith that the data transfer is necessary to respect the law, the regulations or to defend end/or protect the rights or property of its own office, of its website, of its customers, and/or of yourself.

8. Security measures

In order to prevent, as much as possible, any unauthorized access to personal data, our company has developed security and organizational measures. These measures concern both the collection and preservation of data.

All these measures also apply to all our partners, listed under article 7 of the present Privacy Policy.

9. Data retention period

Your personal data will be kept by us for a maximum period of 2 years. Should some of your personal data change, please keep us informed as soon as possible so that we can go on pursuing our data processing purposes.

10. Cookies Policy

A cookie is a file containing information about the behavior of an internet user. This means it records preferences, such as the language chosen. From the technical perspective, a cookie is created by the server of the website visited but recorded on the user's hard drive.

Aside from our cookies, we use also third-party cookies.

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10.1 Our cookies

Via our cookies, we are able to:

- Personalize our services for every user because your preferences are stored (ex.: choice of a language).
- Save you from having to make the same choices on each visit.
- Gather information that you provide via online forms.
- Analyze our website's usage in order to be able to improve it constantly.

The cookies are stored on your hard disk for a maximum of 12 months. The cookies we use, do not allow a person to be identified individually: they do not contain any personal data, so they cannot link you as a person to any name or surname; only the IT system on which the cookie is stored can be identified via its IP address.

10.2 Third-party cookies

Via third-party cookies, we are able to:

- Know how many people have visited our website and how they have visited it (Google Analytics).
- Promote pages of our website (LinkedIn, Twitter, Facebook).
- Share information on social networks (LinkedIn, Twitter, Facebook).

The information collected by Google is as impersonal as possible. Your IP address or other personal data are not explicitly communicated. The information is saved by Google on servers namely located in the U.S.A. Google abides by the "Safe Harbor" principles as well as by the "Safe Harbor" program enacted by the American Trade Ministry. This program secures to all possible personal data a security level in accordance with European regulations. These cookies placed behind the social networks buttons, are active only when you have clicked on these buttons.

Most internet browsers are automatically configured to accept cookies. However, you can configure your browser to authorize or block cookies. Should you refuse cookies to be stored, you would still be able to access and use all pages of our website.

11. Rights of the data subject

If your personal data is processed, you have a number of rights per the provisions of the GDPR. To exercise your rights related to your personal data collected and processed by us, you may contact the Controller via dpo@talencia.eu. Each time you address the Controller to exercise your rights, you are required to be as much specific as possible in your request. In order for us to be able to process your request, documented proof of your identity may be required.

11.1 Right to information

You may obtain the confirmation of what personal data is processed by us.

If we do process your personal data, you may request from us the following pieces of information:

- The purposes for which your personal data is processed;
- The categories of personal data processed;
- The organizations and third parties to which the personal data are or were transferred;
- The retention period of the personal data;
- The rights you have under the provisions of the GDPR (see below articles 11.2 to 11.9);
- All available information as to the origin of the personal data if these data has not been collected from the data subject;

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- The existence of an automated decision-making process including profiling and information on the logic involved as well as the scope and expected effects of such data processing for the data subject;
- The transfer of your personal data to an international organization or a third country and all data protection safeguards undertaken to ensure the security, safety and legality of such personal-data transfers.

11.2 Right to be informed and to consultation

You have the right to access to the personal data that we process about you. If you exercise this consultation right, we will strive to give you an overview as comprehensive as possible regarding your data. However, some personal data might have been erased from our files. And some data stored on media to ensure backups, may over time not allow us to retrieve this data.

11.3 Right to rectification

You can request that your personal data be modified and/or completed if this data is not accurate and up to date.

11.4 Right to restriction of processing

You can request that the processing of your personal data by the Controller be restricted. The reasons for doing so may be:

- *the accuracy of the personal data is contested by the data subject for a period, enabling the Controller to verify the accuracy and completeness of the personal data;*
- *The processing is unlawful and instead of claiming the right of erasure of your personal data, you demand the restriction of their use;*
- *the data subject has objected to processing pursuant to Article 21(1) of the GDPR, pending the verification whether the legitimate grounds of the Controller override those of the data subject.*

In the event where the processing of your personal data has been restricted, the data can be further used only with your written consent or in order to exercise or defend or protect the rights of another person (natural or legal). The right to restriction of processing does not affect the Controller's right to store the data.

11.5 Right to objection

You have the right, at any time, to object to the processing of your personal data. In such a case, the Controller will stop processing this data, unless we can demonstrate compelling reasons that are worthy of protection for processing, that outweigh your interests, rights and freedoms, or whether the processing serves to assert, exercise or to defend legal rights.

11.6 Right to Suppression (or Right "to be forgotten")

You have the right to ask for the immediate erasure of all your personal data, namely because the processing of this data was illegal or because you revoke your consent on which the processing was based. However, there are cases in which suppression is not legally permitted.

In the event that we have made public the personal data about you and we are legally obliged to remove them, we will take appropriate measures, including technical measures, taking into account available technology and implementation costs, to inform our partners' Controller that you have requested the deletion of all links, copies or replicas of personal data about you.

11.7 Right of data portability

You have the right to receive your own personal data that you provided to the Controller, in a structured, commonly used and machine-readable format. You have the right to transfer this data to another Controller without any hindrance from the Controller to which the personal data was provided. You also

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have the right to request for your personal data to be transmitted directly from one controller to another, where technically feasible.

11.8 Right to revoke consent to data processing

You have the right, at any given moment, to revoke your consent to the processing of your personal data. The revocation of the consent does not affect the legality of the data processing carried out on the basis of the consent given until its revocation.

11.9 Right to oppose automatic processing

You have the right not to be subject to a decision based solely on automated processing, including profiling, and producing legal effects affecting you or affecting you similarly and significantly.

However, certain data processing is automated to better serve you. Moreover, in some cases, this right cannot be claimed by virtue of the existence of legal texts authorizing the automated decision.

12. Amendment of our Privacy Policy

The Controller reserves the right to amend the present Privacy Policy, in accordance with the provisions of the existing and applicable data protection laws. The latest version of our Privacy Policy is at any time available on our website.

