

Privacy Notice

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 Client or as a sub-contractor of our company or as a Candidate interested in job offers, these personal data can concern you. This Privacy Notice 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.
- **“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

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

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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:

- Clients: 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 in job offers.
- Partners: legal entities interested in job offers for their own employees.

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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
Clients' contact persons	Name, first name, Phone number, email address, company postal address
Candidates and Partners' employees	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 = Candidates who have been placed.	ID Card, Phone number, picture (when included in the cv), email address, postal address, Curriculum vitae information's (Professional Experiences, Studies, Trainings, certifications, etc.)

In the case Candidates apply for a job offer posted on our website or on another platform but do not give their consent to be contacted for other job offers, their personal data is used exclusively for the purpose of evaluating the match with the job offer in question. Their personal data are saved in our database and systematically archived once the job offer in question is closed.

Our company also processes personal data that has not been delivered by the concerned data subjects, such as personal data communicated by Clients, Partners or Service Suppliers (sub-contractors) and concerning their staff members, their administrators, their end-clients. In such cases, the personal data delivered to Talencia Consulting are the following ones.

Data subjects	Categories of personal data collected
Staff members of Partners	Name, email, telephone number of the persons in charge of finances, purchases, checking incoming invoices or of the persons supervising consultants.
Staff members of Service Suppliers: candidates, consultants	Name, first name, Curriculum vitae information's (Professional experiences, Studies, Trainings, certifications, etc.), ID Card (for consultants only), telephone number, email address.
Staff members of Service Suppliers: others	Name, first name, telephone number of persons in charge of administration.
Administrators	Name, function of the signatory person
Staff members of Clients	Name, email, telephone number of contact person of our Clients.

We also access personal data from ICTJOB, a specialized data provider with whom a contractual relationship exists. We collect the following personal data about potential candidates who have created a personal account on ICTJOB's platform: name, first name, email address, telephone number, Curriculum vitae information's (Professional experiences, Studies, Trainings, certifications, etc.). For more information regarding the way your personal data is processed by ICTJOB, please visit their Privacy Statement page.

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

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6. Purposes of processing

In relation to our mission to match Candidate's profiles with job offers, the purpose of our processing of Personal Data is either based on the Data Subjects' consent (art. 6.1.a of the GDPR), on the contract between the Data Subject (or their employer, that is our Partner) and us (art. 6.1.b of the GDPR) or on our legitimate interest (art. 6.1.f of the GDPR).

Whenever appropriate, we ask you for your consent to process your personal data for other job offers in order to provide you with our recruitment services. This means that we will store your personal data in our databases according to this Privacy Notice. You can withdraw your consent at any time.

Our website provides contact forms that can be used to contact us electronically or to apply to a specific job offer. By clicking the "Send" button, you consent to the transmission to us of the data entered in the input form. In addition, we save the date and time of your contact. Alternatively, contact via the e-mail address provided is possible. In this case, the user's personal data transmitted along with e-mail and our response will be stored. The personal data voluntarily transmitted to us in this context is used to process your inquiry and to contact you as needed. The legal basis for the transmission of the data is Art. 6.1.a of the GDPR. The data will be processed for this purpose until the specific conversation with you has ended. The conversation will be deemed ended when it can be inferred from the circumstances that the relevant facts have been conclusively clarified.

In some exceptional cases, we may rely on our legitimate interest to process your personal data, for example in pre-contractual phase. Article 6.1.f 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 Clients, 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 11 below describing all your rights under the GDPR.

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.

When we have identified a match between your profile and a job offer, we always ask you for your consent before sending your personal data to our client.

Our company calls upon the support of the following Sub-Contractors:

- A **CRM software** for the management of our Clients' and Service Suppliers' data, situated in UK. This Data processor only accesses our data to resolve issues and always with our prior approval. Andy Dobson is their Data Base Administrator and he is based in the UK.

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This Data Processor has appointed a DPO in the UK and has a solid Data Protection Policy within its country. In terms of data flow, all processing activities happen via Go To Assist which is fully encrypted via SSL, auditable and attended by us at any time if we wish so.

- **SAS OVH**, host of our website, situated rue Kellermann 2, BP 80157 à 59100 Roubaix, France; OVH exists since 1999 and is nowadays one of the major actors in the Cloud sector with more than 1 million customers in 18 countries. OVH is specialized in one unique activity: the delivery of IT infrastructures and more particularly, of Cloud. OVH controls the whole hosting chain, from the creation of the servers to the management of the datacenters. Consequently, no other companies are liable to access or visualize the data of OVH's customers. Should OVH in the future choose for sub-contracting some of its activities implying a visualization or access to the data by sub-contractors, this choice would be conditioned to customers' prior approval. OVH's commitment to abide by the laws and regulations in terms of Personal Data Protection is embedded in an appendix to our contract: Data Processing Agreement. In this appendix, OVH asserts to process personal data only to pursue the good execution of the services and only upon the customer's given instructions. 100% of OVH's cloud solutions are based on standards, enabling the customer to retrieve its data very easily. OVH's customers are informed of the location of the datacenter where their personal data are stored. OVH also guarantees that it does not process your data outside the EU or outside any country acknowledged by the European Commission as having an adequate personal data protection level. OVH will never process your data in the USA. In case of data breach, OVH commits itself to warn the customers in the best delays, to inform them about the nature of the incident and the foreseeable consequences as well as about the measures taken to solve or minimize the breach. OVH has a Security Policy for Information Systems et meets the requirements of various norms and certifications such as PCI-DSS, ISO/IEC 27001, certificate SOC 1 type 2 and SOC 2 type 2. Finally, OVH has implemented measures to impede access to infrastructures to non-authorized persons: a security personnel ensures the physical security of its premises 24/24 and 7/7; a permissions management system limits the authorized persons' access to the premises to the course of their duties; strong authentication processes for users and administrators via a strict password policy, etc.
- **CloudVPS B.V.** hosting our CRM and our former website, situated Oostmaaslaan 71, 3063 AN Rotterdam, Holland. CloudVPS became part in 2018 of TransIP Group which enables the two companies to combine their strengths: reliability and ease of use for the TransIP VPS platform and complete flexibility for the scalable OpenStack platform. OpenStack technology is truly supportive to customers' business: the services on this platform are immediately restarted on another server in the event of a hardware failure. In addition, all components within the OpenStack platform are fully redundant, all data is saved three times and customers can choose among three availability zones in the Netherlands. Besides, we can count on a Dutch support from the service desk and engineers. Finally, CloudVPS set the highest standards namely in the field of security management and is certified 270001 since 2013 in its most comprehensive version (all 133 controls are applied to the apparatus of the Information Security Management System).

Personal data in our possession is not transferred to a third country (that is outside of the EEA) or an international organization without your prior consent.

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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 and they are formalized in our General Processes.

These measures also apply to all our partners, listed under article 7 of the present Privacy Notice.

9. Data retention period

We keep the Candidate's personal data for a maximum period of 2 years. Past this term, we will ask you to either update your personal data or whether you would like to be removed from our database. During this period, should some of your personal data change, please keep us informed as soon as possible so that we can keep your personal data up to date and deliver performant services.

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.

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.

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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 under the provisions of the GDPR. To exercise your rights related to your personal data, you may contact the us at dpo@talencia.eu. Each time you do, please be as specific as possible in your request. We may ask you documented proof of your identity in order to fulfil your request.

11.1 Right to information

We have the obligation to inform you about the personal data we process about you. This is the purpose of the present Privacy Notice.

If we do process your personal data, you may request from us the following 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;
- 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 access

You have the right to request access to the personal data that we process about you. If you exercise this consultation right, we will give you an overview as comprehensive as possible regarding your data. This right is only limited by the right to data protection of other persons.

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

If one of the following conditions are met, you can request to restrict the processing of your personal data:

- *When you contested the accuracy of your personal data, for a period enabling us to verify the accuracy of the personal data;*
- *When the processing is unlawful and instead of claiming the right of erasure of your personal data, you demand the restriction of their use;*
- *When the conservation of this personal data is required by you for the establishment, exercise or defence of legal claims, but we no longer need the personal data for the purposes of the processing;*
- *When you have objected to processing pursuant to Article 21(1) of the GDPR, pending the verification whether our legitimate grounds override yours.*

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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 our 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 on grounds relating to your particular situation. In such a case, we shall no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

You always have the right to object to the processing of your data for direct marketing purposes. If you raise an objection with us against marketing purposes, we may put your personal contact information on a blacklist to ensure that we no longer send you any unwanted marketing material. We also keep your request for compliance purposes. The legal basis is a legitimate interest within the meaning of Art. 6 (1) (f) GDPR, where the legitimate interest is that we can meet our obligations from your objection against marketing. The data will be stored for this purpose until you expressly withdraw the objection to marketing in writing.

11.6 Right to erasure (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 unlawful or because you revoke your consent on which the processing was based and no overriding legitimate grounds for the processing apply.

We are also required to erase your personal data when it is no longer needed for the purposes for which it was collected or otherwise processed, or in order to comply with a legal obligation under EU law or the law of the Member States to which we are subject.

Whenever your data has been erased from our databases, we won't keep any information about you until you contact us again.

Exceptions to your right to erasure apply in the following cases:

- For the exercise of the right to freedom of expression and information;
- To satisfy a legal obligation that requires the data to be processed under the law of the EU or the Member States to which the data controller is subject;
- To comply with an injunction from a judicial authority;
- To establish, exercise, or defend legal claims;
- We also keep your request for compliance purposes.

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 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 withdraw your consent to the processing of your personal data. The revocation of the consent has no bearing on the data processing carried out prior to its revocation. If you withdraw your consent, we may put your personal contact information on a blacklist to ensure that we no longer send you any unwanted communication. We also keep your request for compliance purposes. The legal basis is a legitimate interest within the meaning of Art. 6 (1) (f) GDPR, where the legitimate interest is that we can meet our obligations from your consent withdrawal. The data will be stored for this purpose until you expressly authorize to process your personal data again.

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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.

11.10 Information to third parties

If we have communicated personal data concerning you to our Partners or Sub-Processors according to this Privacy Notice, we will take reasonable steps (including in terms of technical feasibility), taking account of the available technology and implementation costs, in order to notify them that you have required the exercise of any of the rights as listed hereabove.

12. Amendment of our Privacy Notice

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

[Last update 01.01.2020]

