

PRIVACY POLICY

Version 1.0
Date: 16/02/2023

1. Identity and contact details of the controller

This privacy policy applies to all personal data processed by **Claeys & Vanrobays BV**, with registered office at Ruiterslaan 8, 2110 Wijnegem, with company number VAT BE0476.860.314, who is the controller of this website.

The Controller attaches great importance to your privacy and therefore processes your personal data in accordance with European Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (hereinafter "GDPR") as well as any future or additional legislation in implementation thereof, as applicable.

As part of our main activity, we act as a processor and a processing agreement will be concluded with each individual controller. Our main activity includes legal services with regard to labor law and social security law, as well as guidance and personnel management of companies in the context of, among other things, organizing social elections, payroll administration.

For further questions or comments in connection with the way in which we handle your personal data, you can always contact us, either by e-mail to privacy@claeysvanrobays.be or by post to the aforementioned postal address.

2. What does "processing personal data" mean?

The processing of personal data (hereinafter "data") includes any processing of data that can identify you as a natural person. You can read about which data this concerns in this Privacy Policy. The term 'processing' is very broad and covers, among other things, collecting, storing, using your data, or sharing it with third parties.

3. What data do we process?

Below we clarify which data we can process from you. Depending on the concrete situation, your preferences and the way in which you contact us, we do not process all of the data below from you.

General

We may process the following data from all our contacts:

- Electronic identification and usage data (e.g. IP address, browser type, location data);
- Contact details (e.g. surname, first name, address, e-mail address, etc.);
- Contact history (e.g. e-mail messages, messages sent via web forms, etc.);
- Company data and other company-related data that can lead to the identification of natural persons.

Main activity

In the context of our main activity, consisting of legal services with regard to labor law and social security law, as well as the guidance and personnel management of companies in the context of, among other things, organizing social elections, payroll management, ... we may also collect the following data:

- Order and payment details;
- After sale data;

Suppliers – service providers

We may also process the following data from our suppliers and service providers:

- Contractual data (e.g. company name, address, VAT number, agreement, etc.);
- Payment and billing data (e.g. payment card details, invoices, etc.);

Candidate employees

We may also process the following data from candidate employees. Of course, this will depend to a large extent on which data you wish to provide to us in connection with your application.

- Personal details;
- Work-related data;
- Personality data;
- Photos provided by the prospective employee himself.

4. For what purposes do we process your data?

The personal data is processed exclusively within the framework of the company and in particular for the following purposes:

- Within the framework of our main activities;
- Organizing events, competitions and meetings;
- Participate in fairs;
- Comply with administrative and tax obligations;
- Communication with customers and prospects;
- Recruitment procedure of employees;

5. On what processing grounds do we process your data?

We process your data for the purposes described below and do not collect and process more and no other types of data than those necessary for these purposes. We only process your data to the extent that it is based on one of the processing grounds listed in the GDPR, and as set out below.

Legal obligation

Certain data is processed by us to comply with legal or regulatory obligations to which we are subject. For example, in the context of tax and accounting obligations or in the field of data protection.

Necessary for the execution of the agreement

Certain data is processed by us because it is necessary for entering into, executing or terminating an agreement with you as a data subject. For example, for contacting, scheduling, responding to a request or requesting information in the context of entering into a contractual relationship, but also the effective execution of the contractual assignment in the context of our main activity, in order to provide you with our services or to receive yours.

Legitimate interest

Certain data is processed by us on the basis of our legitimate interest, which in specific cases outweighs any possible detriment to your rights. For example, to promote our activities to business contacts; improving the quality of our services; training employees and evaluating and maintaining data and statistics relating to our activities, in the broad sense; the retention and use of evidence in the context of liability, proceedings or disputes and for the purpose of archiving the activities; and ensuring security, both online on this website and on our premises.

Permission

Certain data is processed by us on the basis of your consent. For example, for promoting activities to potential business contacts; the use of certain analytical or marketing cookies; posting photos containing personal data on our website and social media channels. Data of applicants after the recruitment procedure will only be kept with permission.

6. Origin of the data

We have also obtained most of the data that we process from you directly from you. Within the framework of our services, we may obtain data from you via external service providers or public sources.

7. Who do we share your data with?

We do not pass on your data to third parties, unless this is strictly necessary in light of the above-mentioned purposes, or if we are legally obliged to do so.

Where necessary, we use external service providers (processors) to support our operational purposes such as the management of our websites and IT systems. If necessary, these external service providers carry out certain data processing operations on our behalf. We will only share your data with these external service providers to the extent necessary for the respective purpose. The data may not be used by them for other purposes. In addition, these service providers are contractually bound to guarantee the confidentiality of your data by means of a "processing agreement" that has been concluded with these parties.

In concrete terms, this means that we share your data, insofar as relevant in your situation, with the following third parties for the following purposes, whereby these third parties act as processors on our behalf in certain cases:

- Postal, transport and delivery companies if we need to send you something by post;
- Payment service providers if we receive payments from you, or vice versa;
- External representatives and consultants or any other parties involved in our main or ancillary activities;
- The processors who assist us in the IT field in operating our organization, with a view to secure and efficient digital data management within our organization;

- Government bodies, judicial authorities and regulated professionals such as accountants and lawyers, for the purpose of complying with our legal obligations and defending our interests, as required.

8. How long do we store your data?

We do not store your data longer than is necessary for the purpose for which the data was collected or processed. Since the period for which the data can be kept depends on the purposes for which the data was collected, the storage period may vary in each situation. Sometimes specific legislation will oblige us to keep the data for a certain period. Our retention periods are always based on legal requirements and a balance of your rights and expectations with what is useful and necessary for the fulfillment of the purposes. After the retention period has expired, your data will be deleted or anonymized.

9. Where do we store your data and how is it protected?

We provide appropriate technical and organizational security measures to prevent the destruction, loss, falsification, alteration, unauthorized access or unlawful notification to third parties as well as any other unauthorized processing of this data within the framework of our activities.

In addition, we also pay attention to the fact that the processors we use also take appropriate security measures to limit the risks of incidents as much as possible.

The data we process remains at all times within the European Economic Area (EEA).

If your data is processed outside the European Economic Area (EEA) when using specific services or software tools, this will only take place in/to countries that have been confirmed by the European Commission to guarantee an adequate level of protection of your data, or there will be measures taken to ensure the lawful processing of your data in these third countries.

10. What are your rights?

You have various rights with regard to the data we process from you. If you wish to invoke one of the following rights, please contact our GDPR manager via the contact details included under the first title of this Privacy Policy.

Right of inspection and copy

You have the right to view your data and to receive a copy of it. This right also includes the possibility to request further information about the processing of your data, including the categories of data that are processed from you and for what purposes.

Right of adjustment or rectification

You have the right to have your data corrected if you believe that we have incorrect data.

Right of data erasure (right to be forgotten)

You have the right to request that we erase your data without unreasonable delay. However, we will not always be able to grant such a request, including when we still need the data in function of an ongoing agreement, or when keeping certain of your data for a certain period is required by law.

Right to restriction of processing

You have the right to restrict the processing of your data. In this way, the processing is temporarily stopped until, for example, there is certainty about its correctness.

Right to withdraw your consent

When the processing is based on your consent, you have the right to withdraw this consent at any time by contacting us. For marketing messages that you receive from us via email based on your consent, you can easily withdraw this consent by clicking on the unsubscribe link at the bottom of any such message.

Right of objection

You have the right to object to the processing of your data that is based on legitimate interest. This should be done on the basis of specific reasons related to your situation. You can also object to the use of your data for direct marketing purposes. An opt-out will always be provided for marketing messages by e-mail.

Right to portability

You have the right to obtain your data that you have provided to us with your consent or in the performance of an agreement, in electronic form. In this way they can easily be transferred to another organisation. You also have the right to request that we transfer your data directly to another organisation, if this is technically possible.

Right to lodge a complaint with your supervisory authority

If you believe that we are processing your data incorrectly, you always have the right to submit a complaint to your data protection supervisory authority.

Belgian Data Protection Authority (GBA)
Drukpersstraat 35
1000 Brussels
contact@apd-gba.be

11. How can you exercise your rights?

You can exercise your rights by contacting us, either by e-mail to privacy@claeysvanrobays.be or by post to Ruiterslaan 8, 2110 Wijnegem, provided that you enclose a copy of the front of your identity card or another document by which you can be identified. The copy will only be used to identify you in accordance with the GDPR.

12. Changes

We reserve the right to change this Privacy Policy. The most recent version is always available on our websites. The date on which this Privacy Policy was last amended can be found at the top. In the event of a substantial change to the Privacy Policy, we will, if possible, directly inform the data subjects on whom this may have an impact.