

Privacy Notice Fine Fleur People

Fine Fleur People Bv is committed to protecting and respecting your privacy. This Privacy Notice (together with any other documents referred to herein) sets out the basis on which the personal data collected from you, or that you provide to us, will be processed by us in connection with our recruitment processes.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation (“GDPR”) the Data Controller is the following legal entity:

Fine Fleur People Bv, Malendriesstraat 37, 3370 Boutersem
Enterprise number: 0756.916.833

If you have questions regarding this privacy notice or the processing of your personal data, you can always contact us by e-mail hello@finefleurpeople.be or by letter to the postal address mentioned above (attn. Privacy).

1. Your Privacy as a candidate or Interim Manager

Your privacy is important for us! You therefore have the right to know which of your personal data we are processing and how we do this.

You will find answers to the following questions in the text below:

- What information do we collect about you?
- What information do we collect about you from other sources?
- How do we process and store your information?
- How long do we keep your personal data?
- What are your rights?
- How do you proceed if you have a complaint?

1.1 Your Personal Information

When you apply for a job opening posted by us, this Privacy Notice will apply to our processing of your personal information.

When you apply for a job opening via the application function on a job site (“Partner”), you should note that the relevant Partner may retain your personal data and may also collect data from us in respect of the progress of your application. Any use by the Partner of your data will be in accordance with the Partner’s Privacy Notice.

1.1.1 Information we collect from you

We collect and process some or all of the following types of information from you:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, We process personal details such as name, email address, address, telephone number, date of birth, qualifications, experience, information relating to your employment history and skills experience, lifestyle preferences and personality profile and other information that you provide to us.
- If you contact us, we may keep a record of that correspondence.
- A record of your progress through any hiring process that we may conduct.

1.1.2 Information we collect from other sources

Fine Fleur People may link the data you provide to us, with other publicly available information about you that you have published on the Internet – this may include sources such as LinkedIn and other social media profiles.

Fine Fleur People will search various databases – some publicly available and others not, which may include your personal data (include your CV or Resumé), to find possible candidates to fill our job openings. Where we find you in this way we will obtain your personal data from these sources.

We may receive your personal data from a third party who recommends you as a candidate for a specific job opening or for our business more generally.

1.2 Uses made of your Information: process and storage

1.2.1 Legal basis for processing

We rely on legitimate interest as the lawful basis on which we collect and use your personal data. Our legitimate interests are the recruitment of staff for our business (executive search & interim management).

Where you apply for a job opening through the Indeed Apply functionality for a procedure within our Executive Search department, we rely on your consent, which is freely given by you during the application process, to disclose your personal data to Indeed on the basis described below. Indeed's Privacy Notice is available on Indeed's website.

1.2.2 Purposes of processing

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the recruitment process.
- To enhance any information that we receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill our job openings.
- To help our Partners (such as the job sites through which you may have applied) improve their services.

1.2.3 Automated decision making/profiling

We may use technology to select appropriate candidates for us to consider based on criteria expressly identified by us, or typical in relation to the role for which you have applied. The process of finding suitable candidates can be automatic, however, any decision as to who we will engage to fill the job opening will be made by our staff and the client.

1.2.4 Disclosure of Your Information

If you have applied for a job using the Indeed Apply functionality for a procedure within our Executive Search department, and you have consented to such disclosure, we will disclose to Indeed certain personal data that we hold, including but not limited to a unique identifier used by Indeed to identify you, and information regarding your progress in our hiring process for the applicable job opening, as well as any tangible, intangible, visual, electronic, current, or prospective information we may have about you, such as your name, contact information, and other information relating to the analysis of data pertaining to you as an applicant (collectively, "Disclosure Data"). Indeed's Privacy Notice in respect of Indeed's use of the Disposition Data is available on Indeed's website.

1.2.5 How we store your Personal Data

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

1.2.6 Recipients of your personal data

For the purposes mentioned in 1.2.2 and limited to what is reasonably necessary, we may have to provide your personal data to the following third parties:

- (Potential) clients
- Companies that provide professional services to us or on our behalf (including but not limited to: accountants, lawyers and legal advisors, payroll administrators, hosting servers, data storage servers).
- Social security authorities
- Public authorities
- Judicial and police authorities
- Other third parties, in connection with corporate transactions (merger, consolidation, etc).

Our IT service, cloud, software providers and web development providers may also have access to your personal data.

Your personal data is only shared with clients to the extent necessary for the evaluation of your suitability for the job application issued by the client. We will never send your resume to our client(s) without your prior approval.

We may share your personal data, if we reasonably believe that such action is necessary to protect the legitimate interests of Fine Fleur People, to defend Fine Fleur People against legal claims, to prevent a crime or prevent or detect fraud.

We will not share your personal data with any third parties for the purposes of direct marketing.

Where we provide links to websites or other organizations, this privacy notice does not cover how these organizations process personal data. You are encouraged to read the privacy notices on the other websites that you visit.

1.2.7 Transfer of personal data

Your personal data will not be transferred outside the European Economic Area without appropriate safeguards.

1.3 Retention period

We will in any event store your personal data until 10 years after the end of our cooperation (if any).

Your personal information will be deleted upon simple request.

1.4 Your rights

Under the General Data Protection Regulation, you have a number of important rights free of charge. In summary, those include rights to:

- Access to your personal data
- Require us to correct any mistakes in your information which we hold
- Require the erasure of your personal data
- Object to the processing of your personal data.
- Request transmission of your data to another service provider.

These rights can be exercised by e-mail at hello@finefleurpeople.be or by letter to the postal address mentioned on the first page accompanied by a copy of your ID card. We will grant you all rights to which you are entitled in accordance with the applicable regulations.

Please also inform us when your personal data is not accurate or no longer up-to-date.

1.5 How to complain

We hope that we can resolve any query or concern you raise about our use of your information.

You can send us a complaint if you consider that we are not acting in accordance with applicable data protection legislation. You can also introduce a complaint with the supervisory authority: Belgian Data Protection Authority (DPA) at [https:// www.dataprotectionauthority.be](https://www.dataprotectionauthority.be), Drukpersstraat 35, 1000 Brussel.

2. Your Privacy as a prospect /client /supplier /public authorities

Your privacy is important for us! You therefore have the right to know which of your personal data we are processing and how we do this.

You will find answers to the following questions in the text below:

- What information do we collect about you?
- How do we process and store your information?
- How long do we keep your personal data?
- What are your rights?
- How do you proceed if you have a complaint?

2.1 Your Personal Information

2.1.1 Information we collect from you

We collect and process some or all of the following types of information from you:

- Identification Data
- Personal characteristics
- Other information provided to us.

2.1.2 Sources of your personal data

In general, we obtain your personal data in the context of our interactions with you via our website, by e-mail, by telephone and at meetings, seminars or events. In certain circumstances, we may also receive certain data from third parties or extract this information from publicly available information.

2.2 Uses made of your Information: process and storage

2.2.1 Legal basis for processing

We primarily collect your personal data as a (member of staff of) a prospect, client or supplier because it is necessary for the conclusion of a contract, the performance of that contract and the management of our contacts. We primarily collect your personal data as a member of staff of a public authority because we have a legitimate interest in managing our contacts with and obligations to public authorities.

We may also process your personal data because:

- you have consented to it

- we have a legal obligation (e.g. tax and accounting regulations)
- we have a legitimate interest that requires us to process your personal data (e.g. in the event of litigation).

2.2.2 Purposes of processing

We collect personal data from you

- as a client or prospect in order to provide services and to manage our contacts
- as a (prospective) supplier in order to receive products or services and to manage our contacts
- as a staff member of a public authority in order to manage our contacts with and obligations towards public authorities.

We may also need your personal data in the context of accounting activities and litigation management.

2.2.3 How we store your Personal Data

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

2.2.4 Recipients of your personal data

For the purposes mentioned in 2.2.2 and limited to what is reasonably necessary, we may have to provide your personal data to the following third parties:

- Accountants
- Legal counsel
- Social security authorities
- Public authorities
- Judicial and police authorities
- Financial institutions and insurance companies

Our IT, cloud, software and web development providers may also have access to your personal data.

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- Require the erasure of your personal data
- Object to the processing of your personal data.
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