

# Care4You Privacy Notice

## Article 1. Introduction

At Care4You, we take seriously the protection of your privacy and confidentiality and we undertake to preserve the confidentiality of all information you provide to us.

This general privacy notice ("Notice") sets out the basis on which Care4You processes the personal data it collects from you. For the purposes of this Notice, Care4You means Wellens Guilloux Consult bvba and is referred to in this notice as "the firm", "we", "us", "our".

Care4You, by means of the present Privacy Policy, also puts itself into compliance with the European Regulation 2016/679 of 27 April 2016 on the protection of personal data.

The controller of your personal data is Wellens Guilloux Consult B.V.B.A. with registered office at Spaarstraat 51, 3010 Leuven, Belgium and recorded in the Crossroads Bank for Enterprises under the number 0544.908.782.

## Article 2. Scope of Privacy Notice

Like most businesses, we hold and process a wide range of information, most of which relates to individuals who are applying to work for one of our clients. This Notice explains the type of information we process, why we are processing it and how that processing may affect you.

The Notice focuses on individuals who are applying to work for one or several of our clients as an employee, contingent worker, a contractor, a consultant or work experience and the data that we process as part of that process.

In brief, this Notice explains:

- what type of personal data we hold and why we process it;
- purposes for which we use your personal data;
- where the data comes from, who gets to see it and how long we keep it;
- how to access your personal data and other rights;
- how to contact us.

## Article 3. Types of personal data processed

"**Personal data**" is a concept defined by data protection law, and refers to any information which relates to an identified or identifiable individual. It includes not only facts about an individual, but also intentions and opinions about them.

"**Processing**" means doing anything with the data. For example, it includes collecting it, holding it, disclosing it and deleting it.

**3.1 When you fill out a contact form on our website or contact us via e-mail, telephone, fax or social media channels, we collect** all data which will enable us to assist you in finding an appropriate job; we will gather personal data about you from your CV and your registration process. This includes, but is not limited to:

- The basic identity information you provide us with, such as name, e-mail address, postal address, telephone number, the company you work for, and your function; your career history, etc.
- The content of your communication and the technical details of the communication itself (with whom you correspond at our end, date, time, etc.);
- Any other personal data you choose to provide to us.

**3.2 When you ask us to work with you as a company we will record information about you, including but not limited to:**

- The basic business contact information you provide us with, such a name, e-mail address, postal address, telephone number;
- Your job title;
- Your organisation;
- The content of your communication and the technical details of the communication itself (with whom you correspond at our end, date, time, etc.);
- Any other personal data you choose to provide to us.

## **Article 4. Purposes for which we use your personal data**

### **4.1**

We process your personal data to provide you in a personalised and efficient way the information, products and services you request.

### **4.2.**

When you are a job seeker we process personal data about you in order to:

- Assist you in finding an appropriate job;
- Communicate with you regarding job opportunities and the progress of any applications you make;
- Provide your details to appropriate prospective employers. We will only share your information with named prospective employers with your permission;
- Provide you with help and advice to assist in your job search;
- Fulfil our obligations to our clients when you are offered employment.

### **4.3.**

When you are an employer and you ask us to work with you, we process your personal data in order to:

- Provide the service you have asked us to provide;
- Provide you with reports on the work we are undertaking on your behalf;
- Advise you of relevant services and products;

### **4.4**

In rare cases it can happen that Care4You must reveal your personal data to comply

with legal obligations or to comply with any reasonable request from competent law enforcement agents or representatives, judicial authorities, governmental agencies or bodies, including competent data protection authorities.

Care4You shall make reasonable attempts to inform you in advance about this, unless it is subject to legal restrictions.

#### **4.5**

We process your personal data for the preservation of our legitimate interests, the legitimate interests of our partners or a third party if and when your registration with or use of our website or other communication channels can be considered (a) a violation of any applicable terms of use or the intellectual property rights or any other right of a third party, (b) a threat to the security or integrity of the websites or other communication channels, (c) a danger to the website or other communication channels or any of our or our subcontractors' underlying systems due to viruses, Trojan horses, spyware, malware or any other form of malicious code, or (d) in any way hateful, obscene, discriminating, racist slanderous, spiteful, hurtful or in some other way inappropriate or illegal.

### **Article 5. To whom we send your personal data**

#### **5.1 Internal use**

Your personal data will be seen internally only by members of our team.

#### **5.2 External use**

We do not send your personal data in an identifiable manner to any third party other than the ones identified in article 3 without your permission to do so.

Where necessary, we will also disclose your personal data if you consent, or where we are required to do so by law and in connection with criminal or regulatory investigations. Please note that when we disclose your data in such circumstances, where applicable, we will ensure that any necessary due diligence has been undertaken on the recipient and any necessary contractual documentation is in place to ensure the integrity and security of the data as required by law.

Care4You will not sell your personal data, rent them out, share them or otherwise make them commercially available to third parties, except as described above or unless with your prior consent.

### **Article 6. Retention of data & quality assurance**

#### **6.1**

Our general approach is to only retain your personal data for as long as is required to satisfy the purpose for which it was collected by us or provided by you (purposes listed in article 4). If you become employed by one of our clients we will keep your personal data for the duration of your employment and for a period afterwards.

#### **6.2**

If you are unsuccessful in gaining employment with 1 of our clients, we will keep your personal data for a short period after informing you that you were unsuccessful and in

any event, normally, for no longer than 12 months from your last contact with us. Your data may be kept on file and considered for other roles.

Your personal data are in any case kept in accordance with the specific statutory provisions, as well as the prescription periods that oblige us to maintain your personal data for a longer period.

### **6.3**

We will take appropriate technical and organizational measures to keep your personal data safe from unauthorised access, improper use or disclosure, unauthorised modification or alteration, theft as well as accidental loss, tampering or destruction. Access by our personnel or our third party processors will only be on a need-to-know basis and be subject to strict confidentiality obligations. You understand, however, that safety and security are best efforts obligations which can never be guaranteed.

## **Article 7. Your Rights**

### **7.1**

You have the right – at any time and free of charge - to request access to all personal data processed by us relating to you. Where we are legally permitted to do so, we may refuse your request and will provide you with our reasons for doing so. We reserve the right to charge an administrative fee for multiple subsequent requests for access that are clearly submitted for causing nuisance or harm to us.

### **7.2**

You are free to communicate your personal data, or not, to Care4You.

In addition, you always have the right to ask us to correct, supplement or delete your personal data. If a request for correction is submitted, such request shall be accompanied of proof of the flawed nature of the data for which correction is asked.

You acknowledge that, in case of refusal to communicate or request of deletion of personal data, certain services are not deliverable.

### **7.3**

You have the right to withdraw your earlier given consent for processing of your personal data or to amend your communication preferences at any time.

### **7.4**

You have the right to request that personal data pertaining to you be deleted if they are no longer required in the light of the purposes outlined in article 4 of this Notice or if you withdraw your consent for processing them. However, you need to keep in mind that a request for deletion will be evaluated by us against:

- Overriding interests of Care4You or any other third party;
- Legal or regulatory obligations or administrative or judicial orders which may contradict such deletion.

Instead of deletion you can also ask that we limit the processing of your personal data if and when (a) you contest the accuracy of the data, (b) the processing is illegitimate, or (c) the data are no longer needed for the purposes listed under article 3.

## **7.5**

You have the right to receive from us in a structured, commonly used and machine-readable format all personal data you have provided to us.

## **Article 8. Security and confidentiality**

We have developed security measures that are appropriate on the technical and organisational levels to prevent the destruction, loss, falsification, modification, unauthorised access or accidental disclosure to third parties of collected personal data as well as any other unauthorized processing of these data.

Under no circumstances can Care4You be held liable for any direct or indirect harm deriving from an erroneous or wrongful use by a third party of the personal data. Care4You have ensured that when they call upon third parties for the processing of personal data, these third parties shall be bound by the same rules.

## **Article 9. Contact details & complaints**

In processing your personal data, we act as a data controller. Our contact details are set out below:

Wellens Guilloux Consult bvba  
Spaarstraat 51  
3010 Leuven (Kessel-Lo)  
Belgium  
Email : [privacy@care4youconsult.com](mailto:privacy@care4youconsult.com)  
Telephone: 0032 16 88 40 90

If you wish to submit a request to exercise one or more of the rights listed under article 7, you can send an e-mail to [be.privacy@care4youconsult.com](mailto:be.privacy@care4youconsult.com). An e-mail requesting to exercise a right shall not be construed as consent with the processing of your personal data beyond what is required for handling your request. Such request should clearly state which right you wish to exercise and the reasons for it if such is required. It should also be dated and signed, and accompanied by a digitally scanned copy of your valid identity card proving your identity. If you use the contact form, we may ask you for your signed confirmation and proof of identity.

We will promptly inform you of having received this request. If the request proves valid, we shall honour it as soon as reasonably possible and at the latest thirty (30) days after having received the request.

If you have any complaint regarding the processing of your personal data by us, you may always contact us via the e-mail address listed above. If you remain unsatisfied with our response, you are free to file a complaint with the Belgian Privacy

Commission: Commission for the Protection of Privacy, Drukpersstraat 35, 1000 Brussels, Tel +32 (0)2 274 48 00, Fax +32 (0)2 274 48 35, e-mail: [commission@privacycommission.be](mailto:commission@privacycommission.be).

#### **Article 10. Status of this Notice**

We reserve the right to modify, change or amend the Notice at its own discretion and from time to time. Such modification, change or amendment shall be communicated via the website and – for companies we work with - via email at the start of a new collaboration. If you do not accept the modifications, changes or amendments, you are to inform us by sending an e-mail to [privacy@care4youconsult.com](mailto:privacy@care4youconsult.com). If we do not receive such an e-mail from you within three (3) business days after the changes to the Privacy Notice have been announced on our website, you will be deemed to have unambiguously accepted all such changes.

#### **Article 11. Applicable law and competent court**

This Notice is governed by, interpreted and executed in accordance with Belgian law, which is solely applicable.