

# Hudson Privacy Notice

This general notice regarding the processing of personal data (hereafter '**Privacy Notice**') governs the processing by Hudson (hereafter '**Hudson**', '**we**', '**us**', '**our**') of your personal data that is collected when you visit our websites or when you contact us via our websites, by email, by telephone, by fax or via social media.

In this Privacy Notice, references to 'Hudson', 'we', 'us' and 'our' pertain to the following entities of our group: Hudson Belgium nv, Avenue du Bourget/Bourgetlaan 42, 1130 Brussels, Belgium, with company registration number BE0459165435.

NOTE: To find out more about the way in which we process personal data using cookies, social media plugins and other tracking technologies, please refer to our Cookie Policy which you can find in the footer of our website.

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## 1. General

1. Your personal data is processed by Hudson: Hudson Belgium nv Avenue du Bourget/Bourgetlaan 42, 1130 Brussels, Belgium, with company registration number BE0459165435.
2. You can contact us by email at [be.privacy@hudsonsolutions.com](mailto:be.privacy@hudsonsolutions.com).
3. We reserve the right to occasionally amend this Privacy Notice at our discretion. You shall be informed of such amendments via our websites. If you do not agree to these amendments, please inform us by sending an email to [be.privacy@hudsonsolutions.com](mailto:be.privacy@hudsonsolutions.com). If we do not receive an email from you within three (3) working days following the announcement of the amendments to the



Privacy Notice on our websites, it shall be assumed that you unequivocally consent to the amendments.

## 2. When and why we process your personal data

### 1. When you use the websites or contact us

#### 1.1. When you use our websites, we collect:

- technical information about the device you are using, such as your IP address, browser type, geographical location and operating system; and
- information on your surfing behaviour, such as the amount of time you spend on a page, what links you click on, what pages you visit and how often you visit a particular page.

We collect this personal data because it is required in order for us to pursue our legitimate interest to perform statistical analyses with a view to improving our websites, products and services or developing new products and services.

#### 1.2. When you fill in a contact form on our websites or contact us by email, telephone, fax or social media, we collect:

- the basic identity information you provide us with, such as your name, email address, postal address, telephone number, employer and role;
- the content of the message and the technical details thereof (with whom you communicate, the date, the time etc.); and
- any other personal data you provide us with.

We collect this personal data because it is required in order for us to pursue our legitimate interest as a professional service provider to offer you the requested information, products and services in a personal and efficient manner.

We retain this personal data for as long as we remain in contact with you and:

- for customers and suppliers: at least for as long as you remain our customer or supplier and, depending on the message, until all limitation periods for claims in connection with the communication have expired;
- for candidates: for as long as you are a candidate for a vacancy, and up to a maximum of 5 years after this if you have already undergone an application process with us.

### 2. If you are a candidate wishing to apply for a vacancy with one of our customers

When you use our websites or another method in order to apply for a vacancy, and in order to allow us to help you find a suitable job, we collect your personal data via your CV and the registration process. Such data includes, but is not limited to:



- the basic identity information you provide us with, such as your name, email address, postal address, telephone number, employer and role;
- your employment history;
- references;
- CV; and
- any other personal data you provide us with.

We collect this personal data because it is required in order for us to pursue our legitimate interest as a recruitment and selection services provider to be able to propose suitable candidates to our customers who rely on us to fill their vacancies. Should you not wish for us to share this data, you acknowledge that we will be unable to search for a position for you.

We also collect this personal data, **with your express and unambiguous consent**, in order to inform you of potential future opportunities, which involves adding your data to our recruitment pool.

In both cases, the data is used for the following types of processing:

- helping you find a suitable job;
- communicating with you about available roles and the status of any applications;
- providing your data to suitable future employers;
- meeting our obligations to our customers when you are offered a job; and
- asking for your feedback on our services.

In the case of the second example, i.e. when you give your consent to be added to our recruitment pool, this involves in particular the following types of processing:

- providing you with notifications about available roles we think might interest you;
- helping and advising you in your search for a new job; and
- giving you information about general trends on the job market.

Except under very specific circumstances where this is necessary given the particular nature of a vacancy, we will not ask for sensitive data in connection with applications and recruitment procedures. Sensitive data is personal data relating to your racial or ethnic origin, political opinions, religious beliefs, trade union membership, health, sex life or sexual orientation, or criminal convictions and/or offences. Unless specifically requested for a particular vacancy, we ask you to **refrain** from providing such data. If you nonetheless decide to upload sensitive data about yourself or provide us with such data by other means, the uploading or provision of this data shall be deemed to constitute **your express and unambiguous written consent** to process this data in connection with your application.



However, if we are of the opinion that we cannot process this personal data in a proper legal manner, we will delete it.

We retain your personal data at least for the duration of any active application process, and up to 5 years after the end of such a process, regardless of the outcome thereof. In addition, we retain your data for as long as you remain a candidate in our recruitment pool, and until you withdraw your consent.

### 3. If you are a candidate applying for a job at Hudson

When you submit an application via our websites or by other means, either speculatively or for a particular vacancy at Hudson, we collect your personal data via your CV and the registration process. Such data includes, but is not limited to:

- the basic identity information you provide us with, such as your name, email address, postal address, telephone number, employer and role;
- your employment history;
- references;
- CV; and
- any other personal data you provide us with.

When you apply for a particular vacancy, we collect this personal data because it is required in order for us to enter into a contract with you and to implement that contract. If you are selected, this personal data will also be used during the term of your employment with us. Should you not wish for us to share this data, we will be unable to enter into a contract with you.

If you are submitting a speculative application or are not selected for a job but we want to add your data to our recruitment pool, we will do so with your **express and unambiguous consent**.

We also process this personal data in pseudonymised form for the purpose of statistical analyses in order to pursue our legitimate interest to improve our application and recruitment processes and systems.

We do not request any sensitive data in connection with applications to work at Hudson. Sensitive data is personal data relating to your racial or ethnic origin, political opinions, religious beliefs, trade union membership, health, sex life or sexual orientation, or criminal convictions and/or offences. As a matter of principle, we also request that you **refrain** from providing such data. If you nonetheless decide to upload sensitive data about yourself or provide us with such data by other means, the uploading or provision of this data shall be



deemed to constitute **your express and unambiguous written consent** to process this data in connection with your application. However, if we are of the opinion that we cannot process this personal data in a proper legal manner, we will delete it.

We retain your personal data at least for the duration of any active application process, and up to 5 years after the end of such a process, regardless of the outcome thereof. In addition, we retain your data for as long as you remain a candidate in our recruitment pool, and until you withdraw your consent.

4. If you are, or are representing, a customer or supplier of Hudson

If you are a customer or supplier of Hudson, or are representing one of the latter, we collect the following personal data in connection with our customer or supplier relationship with you:

- the professional contact details you provide, such as a name, email address, postal address and telephone number;
- the title of your role;
- your company;
- financial data (bank account number, cost centre etc.);
- data on your interactions with us;
- your feedback on our products and services (if you are a customer);
- our feedback on the products and services you provide (if you are a supplier); and
- your business interests.

If you are a self-employed individual or sole trader who is our direct customer or supplier, we collect this personal data because it is necessary in order for us to enter into and implement a contract with you. If you are a customer this allows us to provide you with our products and services, and if you are a supplier this allows you to provide us with your products and services. This also includes forms of administrative processing of your data that are typical of customer or supplier relations, such as archiving of contracts, order processing, invoicing and accounting.

If you are representing an organisation, public authority or body, or company that is our customer or supplier, we collect this personal data because it is required in order for us to pursue our legitimate interest to enter into and implement a contract with your employer or client. This means, inter alia, that we process your personal data in connection with archiving contracts, processing orders, invoicing and accounting.

In both of the aforementioned cases, we also collect your personal data:



- in order to pursue our legitimate interest to build and maintain a customer or supplier relationship, whereby we process your personal data in our customer relationship management (CRM) system;
- in order to meet our legal obligations, for example as regards tax legislation.

If you do not wish to provide your personal data in cases where this is necessary in order to conclude and implement our contract with you or with your employer or client, you acknowledge that we will be unable to enter into a contract with you or with your employer or client.

We retain your personal data for as long as you remain our customer or supplier or a representative thereof, and for up to 10 years after termination of our relationship with you. If you no longer work as a representative of our customer or supplier, we will anonymise your personal data to the greatest extent possible as soon as we are informed hereof, unless this would adversely affect the integrity of certain documents such as contracts, orders and invoices.

#### 5. When you visit one of our branches

When you visit one of our branches, we collect the following personal data:

- your image if CCTV is in operation at the branch in question (which will be indicated by a camera icon); and
- your name, company and the person you have come for when you sign in at reception.

We collect this personal data because it is required in order for us to pursue our legitimate interest to ensure adequate security at our branches and to always have the ability to check who is present at our branches.

This personal data is only retained for one month, unless there has been a security incident that means we must retain this personal data for a longer period as evidence.

#### 6. When you receive one of our invitations to an event, training session or webinar and you participate in this event, training session or webinar

##### 6.1. If you are already one of our customers or have previously taken part in our events, training sessions or webinars, we collect the following personal data:

- your name;
- the title of your role;
- your company;
- your email address; and
- your communication preferences.



If you are already one of our customers or have already signed up to one of our events, training sessions or webinars, we collect this personal data because it is required in order for us to pursue our legitimate interest to be able to invite you to these events, training sessions and webinars in future.

You will receive these invitations by email, and they will be sent to the address you used when registering with us. You can always unsubscribe from our invitation emails by clicking on the 'Unsubscribe' button at the bottom of the page.

We retain your personal data for as long as you remain our customer. If you unsubscribe, you will no longer receive invitations from us, but the aforementioned data will still be retained for the amount of time stated in Article **Error! Reference source not found..**

6.2. If you are not yet one of our customers or have not yet taken part in our events, training sessions or webinars, but you sign up to receive invitations to events, training sessions and/or webinars, we collect the following personal data:

- your name;
- the title of your role;
- your company;
- your email address; and
- your communication preferences.

If you indicate that you wish to receive our invitations, you are deemed to have given your express and unambiguous consent to us collecting this personal data in order to email you invitations to events, training sessions or webinars. You can always withdraw your consent by unsubscribing from our invitation emails, which can be done by clicking on the 'Unsubscribe' button at the bottom of the page.

We will retain your personal data until such time as you unsubscribe. Once you unsubscribe, your personal data will be anonymised in such a way that we can still meet your request to unsubscribe.

6.3. When you register for one of our events, training sessions or webinars, we collect the following personal data:

- your name;
- the title of your role;
- your company;
- your email address;
- the event, training session or webinar in which you wish to participate;
- whether or not you actually attend;



- certain preferences with respect to your attendance;
- your image; and
- your interactions during the event, training session or webinar if this takes place online or if the interactions are recorded; and
- your feedback on the event.

We collect all of this personal data, with the exception of your image, your interactions and your feedback, because this personal data is required in order for us to be able to carry out our contract with you regarding your registration and participation in the event, training session or webinar. You acknowledge that if you do not wish to share your personal data, you cannot register for the event, training session or webinar. We also collect this data and your feedback in order to pursue our legitimate interest in improving our events, training sessions and webinars and ensuring we always send you relevant and interesting offers.

We retain this personal data until the event, training session or webinar has been concluded, and for up to 5 years afterwards.

Certain preferences indicated by you when participating in an event or training session may include dietary requirements and, in particular, allergies. Given that this data concerns your health, we will request your express and unambiguous consent to process this personal data where necessary. You acknowledge that this personal data is also necessary to ensure you can safely participate in the event or training session.

We only retain this personal data until the event or training session has taken place.

The event, training session or webinar may be recorded in video and/or audio form; in the case of events and training sessions that take place in person, photographs may be taken. Depending on the recording technology used, this will mean that the data we collect will comprise your image and your spoken or written interactions. If we use recording technology, we will request your express and unambiguous consent for this collection of your personal data. However, you acknowledge that it is necessary in order for us to pursue our legitimate interest to report on our events or training sessions to take general pictures in which you are not immediately recognisable. As such, we do not request your consent for the taking of such pictures.

We retain this personal data until you withdraw your consent, unless we have processed this personal data and included it in a printed publication that we cannot eliminate, or up until such time as you make a valid objection to the processing of your personal data.

#### 7. When you receive our newsletters or other promotional messages





7.1. If you expressly inform us that you wish to receive news about our products and/or services or other promotional messages, we collect:

- your name;
- the title of your role;
- your company;
- your email address; and
- your communication preferences.

If you indicate that you wish to receive our newsletters or other promotional messages, you are deemed to have given your express and unambiguous consent to us collecting this personal data in order to email you these messages. You can always withdraw your consent by unsubscribing from our messages, which can be done by clicking on the 'Unsubscribe' button at the bottom of the page.

We will retain your personal data until such time as you unsubscribe. Once you unsubscribe, your personal data will be anonymised in such a way that we can still meet your request to unsubscribe.

7.2. If you are already one of our customers, we collect:

- your name;
- the title of your role;
- your company;
- your email address; and
- your communication preferences.

If you are already one of our customers, we collect this personal data because it is required in order for us to pursue our legitimate interest to keep you informed about our products and services. You will receive these messages by email, and they will be sent to the address you used when registering with us. You can always unsubscribe from our messages by clicking on the 'Unsubscribe' button at the bottom of the page.

We retain your personal data for as long as you remain our customer. If you unsubscribe, you will no longer receive invitations from us, but the aforementioned data will still be retained for the amount of time stated in Article **Error! Reference source not found.**

8. When you provide a testimonial for our products and/or services

8.1. If you contribute to a testimonial for our products and/or services, depending on the form of the testimonial (video, audio, text and/or photo) we collect the following personal data:

- your name;



- if applicable, your company and role;
- your image; and
- your voice.

We collect this personal data with your express and unambiguous consent and use it in order to promote our products and/or services, depending on the choices you make in your declaration of consent, on our website, on social media, in publications and/or during our events, training sessions and webinars.

We retain this personal data until you withdraw your consent, unless we have processed this personal data and included it in a printed publication that we cannot undo.

### 3. General purposes for which we use your personal data

We also process your personal data for general purposes in addition to the purposes listed above. This concerns personal data from all categories set out in Article 2. In the cases described below, your personal data is retained for as long as necessary in order to achieve the objective in question.

1. We process your personal data in order to meet our legal obligations or to respond to any reasonable requests from competent law enforcement agencies or representatives, courts, and public bodies or organisations, including competent data protection authorities.

Your personal data may be provided to the police or courts as evidence at our own initiative or if there are grounds to suspect that you have committed an illegal act or a crime when registering via or using our website, or in any other communication with us.

2. We process your personal data in order to pursue our legitimate interest in preparing for and/or carrying out mergers, takeovers, divisions and similar corporate transactions.
3. We process your personal data in order to pursue our legitimate interest in preparing and conducting our defence in disputes and in-court or alternative dispute settlement procedures.
4. We process your personal data in order to safeguard our lawful interests and those of our partners or third parties if and when your registration via or use of our website or other communication channels may be regarded as (a) a breach of any and all applicable terms of use, intellectual property rights or of any other rights of a third party; (b) a risk to the security or integrity of our websites or other communication channels; (c) a risk to the website, other communication channels or underlying systems of our subcontractors as a result of viruses, trojans, spyware, malware or any other form of malicious code; or (d) hateful, obscene, discriminatory, racist, defamatory, vindictive, offensive which is otherwise inappropriate or illegal in nature.



## 4. Recipients

1. Your personal data is shared with third parties to the extent necessary in order to achieve the aforementioned purposes. This means your personal data may be shared, depending on which of the above purposes it is being used for, with:
  - yourself;
  - the organisation you represent;
  - potential future employers;
  - the companies in our group;
  - competent law enforcement authorities or representatives, courts, and public bodies or organisations, including competent data protection authorities;
  - third parties with which we are negotiating mergers, takeovers, divisions or similar corporate transactions;
  - specialists contracted by Hudson, such as advisers and accountants; and
  - social media companies if you contact us via social media or if we share images or recordings of events or training sessions on social media.
2. In addition, we rely on third parties to be able to offer you the use of our websites, products and services, and events, training sessions and webinars and in order to achieve the objectives set out in Articles 2 and 3. These third parties process your personal data on our behalf and for our account. For example, we work with trusted (IT) service providers in connection with the hosting and maintenance of our website, the performance of research and the provision of email services, with providers of CRM systems, with event organisers etc. If you are looking for a job, we work together with third parties who perform tasks on our behalf, such as checking references, certificates and extracts (where this is allowed by law), carrying out psychometric evaluations and testing skills.
3. These external processors are carefully selected and contractually obliged to ensure the security and integrity of your personal data.

## 5. Location and transfer

1. We primarily process your personal data in the European Economic Area (i.e. the EU, Norway, Liechtenstein and Iceland). In order to be able to process your personal data for the purposes set out in Articles 2 and 3 of this Privacy Notice, we may transfer your personal data to third parties outside the EEA for processing.

Any entity outside the EEA that is responsible for processing your personal data has an obligation to take the necessary measures to protect it. Such measures are the result of:



- applicable legislation in the country in question that is regarded as offering equivalent protection to that offered in the EEA; or
- a contractual agreement between us and the entity in question.

For more information about this, please get in touch.

## 6. Quality guarantees

1. We do our utmost to only process personal data that is required for the purposes set out in Articles 2 and 3 of this Privacy Notice.
2. We will take the necessary technical and organisational measures to protect your personal data against unauthorised access, inappropriate use, unauthorised release, unauthorised modification and theft, and accidental loss, manipulation or destruction. Only those members of staff or third-party processors who need to be aware of your personal data may access it. In addition, they are bound by strict confidentiality obligations. However, you acknowledge that although we do our utmost to protect your data, the security and protection thereof can never be guaranteed absolutely.

## 7. Your rights

1. You have the right to inspect the personal data about you that we process. We may refuse your request if we are permitted to do so by law. In that case, we will inform you of the grounds for our refusal. We reserve the right to charge an administration fee if several requests to inspect personal data are submitted with the clear intention of causing us harm or inconvenience.
2. You have the right to ask us to amend any incorrect personal data held on you free of charge. When submitting such a request, it must be accompanied by evidence showing that the data to be corrected is indeed incorrect.
3. You have the right to withdraw your consent to the processing of your personal data or to modify your communication preferences at any time.
4. You have the right to request the deletion of your personal data if it is no longer required for the purposes set out in Articles 2 and 3 of this Privacy Notice by withdrawing your consent to its processing or by raising a valid objection to the processing of your personal data. We will of course also delete your personal data if we are obliged to do so by law. However, please note that we will evaluate any such request for deletion taking account of:
  - the legitimate interests of Hudson and any third parties; and
  - legal or regulatory obligations, or administrative or court orders that preclude such deletion.



5. Instead of asking us to delete your personal data, you can also ask us to restrict the processing thereof if (a) you are contesting the accuracy of the data; (b) the processing thereof is unlawful; or (c) the data is no longer required for the purposes set out in Articles 2 and 3.
6. You have the right to request that we provide you with all of the personal data we have collected from you in a structured, accessible and machine-readable format. However, this only applies if we collected your personal data electronically, with your consent, or if it is necessary to conclude or carry out our contract with you.
7. If you wish to exercise any of the aforementioned rights, you can do so by sending an email to [be.privacy@hudsonsolutions.com](mailto:be.privacy@hudsonsolutions.com).

An email containing a request to exercise a particular right will not be interpreted as consent to the processing of your personal data, except to the extent necessary in order to handle your request.

Any such request must clearly state which right you wish to exercise and, if necessary, the reason why. The request must be dated and signed and accompanied by a digital, scanned copy of your valid identity card as proof of your identity. If you use the contact form, we may ask for a signed confirmation and proof of identity. We ask for proof of identity to be sure that it is actually you making the request.

We will inform you immediately that your request has been received. If the request appears to be valid, we will approve it as soon as reasonably possible, but within thirty (30) days from receipt at the latest.

If you have any complaints regarding the processing of your personal data, you can always contact us at the aforementioned email address. Should you not be satisfied with our response, you can file a complaint with the competent data protection authority.