

European Affairs Recruitment Specialists (EARS)

Privacy Policy

Last update on 25 June 2018

Because we value your privacy, EARS commits to process your Personal Data in a respectful and proportionate manner.

The Controller of your Personal Data is European Affairs Recruitment Specialists SPRL, a company having its registered office in Belgium at B-1000 Brussels, Square de Meeüs 35; company number 0536.258.659 (**EARS** or **we**).

For any question regarding the processing of your Personal Data, please send us an email at info@theears.eu

This Privacy Policy (Policy) informs you about the way we process your Personal Data and about your rights, it contains the following information:

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1. Scope

This Policy describes the way we process the information relating to identified or identifiable natural persons (**Personal Data**) as well as your right, *i.a.* when using the website www.theears.eu (**Website**).

This Policy was last updated on the above date. It may be adapted from time to time so please check it regularly. Any significant changes to this Privacy Policy will be notified to you or clearly mentioned on the home page of the Website.

Concepts such as “processing”, “controller”, “processor”, “data subject”, “personal data”, *etc.* have the meaning given in the General Data Protection Regulation (**GDPR**) (Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data). The GDPR is available here: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0679>.

2. Purposes of the processing

Your personal Data are processed for specific purposes depending on the type of relationship we have with you.

Your Personal Data are only processed for the following purposes:

- If you are a candidate:
 - o To perform our recruitment activities, including collecting data about you and your profile, storing such data, using such data to inform you about job opportunities and connect you with the right employers, carrying out our obligations with our clients ;
 - o To keep you posted about the development of the activities of EARS;
 - o To carry out our obligations with our clients regarding the recruitment of candidates;
 - o To keep you posted about the development of the activities of EARS.
 - o To allow us establishing, exercising or defending legal claims;
- If you are a client:
 - o To perform the contract between you and us;
 - o To send you information about candidates you might be interested in;
 - o To keep you posted about the development of the activities of EARS;
 - o To allow us establishing, exercising or defending legal claims;
- If you are a supplier:
 - o To communicate with you
 - o To manage our relationship with you;
 - o To establish, perform and terminate contracts for the provision of goods and/or services;

- To allow us establishing, exercising or defending legal claims.

With a view to allow us providing our services, you have to share certain Personal Data with us, which are necessary to the performance of these services:

- As a candidate, the Personal Data allowing us to process your application;
- As a client of EARS, the Personal Data with a view to manage our contractual relationship with you, *i.e.* mainly informing you about potential candidates;
- As a supplier, we need certain Personal Data with a view to manage our contractual relationship with you.

In certain circumstances, we are using Personal Data originating from other sources. As a candidate or potential client, we might use Personal Data originating from publicly available sources and websites (including social networks such as LinkedIn) or data originating from third parties (including referees, former colleagues or employers).

3. Legal grounds of the processing

The processing of your Personal Data by EARS relies on the following legal grounds:

a. Our contract with you

In most cases, we process the Personal Data necessary for the performance of our contract with you, *i.e.* mainly connecting candidates and employers.

We only collect those data which are necessary to perform such activities.

b. Our legitimate interest

In certain cases, we may process your Personal Data on the basis of our legitimate interest to do so.

This is *i.a.* the case when we process your Personal Data with a view to communicate with you or inform you about our services similar to those for which we already worked together. Under these circumstances, our legitimate interest is to carry on and develop our business. This instance includes “direct marketing”, *i.e.* using your email address to send you communications regarding opportunities you might be interested in, because already have been working together (either as a candidate or a client). You always have the opportunity to oppose to such communications (see article **Erreur ! Source du renvoi introuvable.**).

c. Your consent

In certain cases, you can expressly consent to the processing of your Personal Data, for instance when you subscribe to our newsletter without working with us a candidate or a

client, or when we send you information on other topics than those for which we already worked together. Once you gave your consent, you can withdraw it at any time.

4. Categories of Personal Data processed by EARS

Depending of our relationship with you, we process different types of Personal Data.

These data include *inter alia*,

- if you are a candidate:
 - o Contact details (name, first name, address, phone, fax and email);
 - o Nationality, date of birth, sex/gender and marital status;
 - o Photograph;
 - o *Curriculum vitae* (education, employment and interests);
 - o References;
 - o Financial information (current remuneration);
 - o Any additional information provided by you on a voluntary basis;
 - o Any additional information provided by your referees;

- If you are a client:
 - o Contact details (name, first name, address, phone, fax and email);
 - o Information regarding your interactions with us (contracts, attendance to our events, ...);
 - o Financial and bank information (bank account, credit history and other financial information);

- If you are a supplier:
 - o Contact details (name, first name, address, phone, fax and email)
 - o Professional details (company, function, department, website)
 - o Financial and bank information (bank account, credit history and other financial information)
 - o Information allowing us to receive your goods and services

The Personal Data at our disposal are always communicated by yourself, when contacting us via our Website or when subscribing to our Newsletter.

5. Recipients of the Personal Data and transfer to other countries

For the purposes described in Article **Erreur ! Source du renvoi introuvable.**, we may transfer your Personal Data to third parties (the « recipients »):

- As a candidate, Personal Data will be shared with our clients, *i.e.* potential employers looking for profiles like yours;
- Third party service providers, and in particular IT and hosting providers.

Your Personal Data are stored in Belgium or in another country of the European Economic Area.

Your Personal Data shall never be shared with business partners for commercial purposes, unless with your consent.

6. Duration of the storage of the Personal Data

We will keep your Personal Data for no longer than is necessary for the purposes for which the Personal Data are processed.

7. Your rights with respect to your Personal Data

You have the following rights with respect to your Personal Data:

a. Right of access

You have the right to obtain from EARS confirmation as to whether or not Personal Data concerning you are being processed and, where that is the case, access to the personal data and information regarding their processing.

b. Right to rectification

You have the right to obtain the rectification of inaccurate Personal Data, and to have incomplete Personal Data completed.

c. Right to erasure

You have the right to obtain the erasure of Personal Data concerning you when there is no reason to process them any longer.

d. Right to restriction of processing

You have the right to obtain restriction of processing. In such case, we will only be allowed to store your data to the exclusion of any other processing.

e. Right to object

You have the right to object to processing of Personal Data concerning you. When your Personal Data are processed for direct marketing purposes, you can object their processing at all times.

f. Right to withdraw consent

When you gave your consent to the processing of your Personal Data, you have the right to withdraw such consent at all times, without such withdrawal affecting the lawfulness of processing based on consent before its withdrawal.

g. Right to lodge a complaint with the Data Protection Authority

You have the right to lodge a complaint with the Data Protection Authority, at the conditions and within the limits set by the GDPR and any other legislation applicable to the processing of Personal Data:

Autorité de protection des données

Rue de la Presse, 35, 1000 Bruxelles

Tel: +32 (0)2 274 48 00

Fax: +32 (0)2 274 48 35

Email: contact@apd-gba.be