

## > General characteristics

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## 1. Why have a GDPR statement on personal data protection?

### > Preamble

Your privacy is a priority for Credendo ECA (hereinafter referred to as 'We'/'Us'). In this respect, we undertake to respect applicants' personal data (hereinafter referred to as 'You'), to process them with the greatest care and to provide the best level of protection for them in accordance with 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 (hereinafter referred to as the 'GDPR') and with the applicable national regulations.

This privacy policy provides information on:

- what personal data we collect about You and the reasons for this;
- how we use your personal data;
- your rights regarding your personal data and the means of exercising.

### > Glossary of the main legal terms used in this policy

Terms frequently used in this policy	Explanation of the terms in plain language
<b>Personal data</b>	All types of information relating to a natural person, i.e. an individual (You) who can be identified, directly or indirectly, as a person different from other people.  For example, a name, photo, fingerprint, e-mail address, telephone number, social security number, etc.
<b>Processing</b>	Any use of personal data, regardless of the process used (recording, organising, storing, amending, aligning with other data, transmitting, etc. of personal data).
<b>Data Protection Officer (DPO)</b>	The data protection officer is, in particular, responsible for compliance with the GDPR and with the applicable national laws within the company, as well as compliance with our policies and practices for managing your personal data. He/she is also responsible for collaborating with the supervisory authorities. The DPO is your first point of contact for any requests relating to your personal data.
<b>Controller</b>	The person, public authority, company or body that controls your data and decides on any use of these data. It is the controller who decides to create or delete data processing and determines why your data will be processed and to whom they will be sent. The controller is the main party responsible for ensuring the protection of your data.
<b>Processor</b>	Any natural or legal person who carries out processing tasks as instructed by and under the responsibility of the controller.

## 2. Who is responsible for the use of your data as part of your application at Credendo?

The Controller responsible for the processing of your personal data is Credendo ECA, the head office of which is at Rue Montoyerstraat, 3 - 1000 Brussels, Belgium, registered in the BCE [Crossroads Bank for Enterprises] under No 0203.286.759.

Any questions relating to the processing of your personal data can be sent to the following email address: [credendodataprotection@credendo.com](mailto:credendodataprotection@credendo.com).

Credendo ECA has appointed a data protection officer (DPO) in the person of Mr Geert Goossens. He is, in particular, independently responsible for ensuring that the rules for the protection and management of your data are applied internally and for collaborating with the supervisory authorities.

The contact details for Mr Goossens are as follows:

For the attention of the Data Protection Officer  
Rue Montoyerstraat, 3  
1000 Brussels  
Belgium  
E-mail: [credendodataprotection@credendo.com](mailto:credendodataprotection@credendo.com)

## 3. Why do we collect your personal data and on what grounds?

Credendo ECA collects and uses your personal data in the framework of your application for a current or future employment at Credendo ECA or at one of the other Credendo entities. The legal ground for the processing of your personal data is the execution of a pre-contractual measure (Article 6.1. b, GDPR).

## 4. What personal data do we collect about you?

Credendo ECA only collects the personal data you provide us with in the framework of a recruitment or application procedure within Credendo or one of its entities.

Below you'll find a detailed overview of the data we collect for this purpose:

- > Personal identification data
- > Demographic characteristics
- > Information about your marital status/family situation
- > Nationality and, if needed, proof of identity, work permit and residence document (mandatory inspection by the law on the employment of foreign employees)
- > Resume, cover letter, information on education/degrees and professional experience, information you share in application interviews
- > Photographs
- > Psychological data
- > Hobbies and interests
- > Criminal record extract (if legally obliged)
- > References (only with your consent)
- > Data from social media

## 5. Who do we share your personal data with?

We may share your personal data with other Credendo entities as part of our activities. Of course, we always do so in a way that will ensure optimal protection of your personal data.

The list of the entities in the group with which we share your data, and where they are established, is available on our website <https://www.credendo.com>.

Furthermore, subcontractors may obtain access to your personal data for the processing they execute for us, namely CornerStone (cloud application; SaaS) which is located in the United States (see question 10 infra).

## 6. Do we exploit your personal data?

We do not share your data with trading partners who would like to offer you products and services.

## 7. How long do we keep your personal data for?

Credendo ECA has set out the following rules concerning the duration for which your personal data are kept.

2 years, starting from 31/12 of the year in which we obtained your personal data.

## 8. What rights do you have regarding your personal data and how can you exercise them?

We would like to inform you of your rights with regard to your personal data.

### A. Right of access

You can access all of the following information regarding:

- The categories of personal data that we collect about You;
- The reasons why we use these data;
- The categories of persons to whom your personal data have been or will be communicated and in particular persons based outside Europe;
- The duration for which your personal data will be kept in our systems;
- Your right to ask us to correct or erase your personal data or to limit the use that we make of your personal data, and your right to oppose such use;
- Your right to make a complaint to a European data protection authority;
- Information concerning the source when we have not collected your personal data directly from You;
- The way in which your personal data are protected when they are transferred to countries outside Europe.

### B. Right to correction

You can ask us to correct and/or update your personal data.

## C. Right to erasure of data

You can also contact us at any time to ask us to erase the personal data that we are processing about you, if one of the following situations applies to you:

- Your personal data are no longer necessary as the reasons for which they were collected or processed are no longer valid;
- You have withdrawn your consent, which is the basis for Credendo ECA to process your personal data;
- For your own reasons, you believe that one of the instances of processing your data is infringing on your privacy and causing you excessive damage;
- You no longer wish to receive commercial proposals from us;
- Your personal data are not being processed in accordance with the GDPR and with the applicable national regulations;
- Your personal data must be erased to comply with a legal obligation provided for by European Union law or by Belgian national law to which Credendo ECA is subject.

## D. Right to object

Generally, the applicable legislation gives you the right to object, at any time for a reason particular to you, to the processing of your personal data. Indeed, if you believe that such processing is infringing on your privacy and/or causing you excessive damage, you may use this right.

However, under no circumstances may You prevent us from processing your data:

- if such processing is necessary for the entering into or performance of your contract;
- if such processing is required by law or by a regulation. This is particularly relevant when you move to another town;
- if such processing is required to record, exercise or defend the rights in court.

You can object to the use of your personal data for commercial proposal purposes and, in particular, advertising actions. You can also object to profiling insofar as it is connected to such a proposal (for example when we send personalised content to you).

## E. Right to data portability

With this right you will have the chance to control your personal data yourself more easily and, more precisely, to:

- recover your personal data, which are being processed by us, for your personal use and to store them on a device or in private cloud storage, for example;
- transfer your personal data from us to another company, either by you or directly by us, provided that a direct transfer is 'technically possible'.

This right concerns your data that have been actively and knowingly declared, such as the data you provide (e.g. personal identification data), and the information that we collect.

Conversely, the personal data that are derived, calculated or inferred from the data that you have provided are excluded from the right to data portability because they are created by us.

## F. Right to restriction of processing

You have the right to obtain restriction of processing, meaning that your registered personal data will be marked (for example a temporary move of your personal data to another processing system of blocking these data in order for them to become inaccessible) in order to restrict future processing.

You can exercise these rights when:

- you dispute the correctness of your personal data;
- your personal data are not being processed in accordance with the GDPR and with Belgian legislation;
- your personal data are no longer needed for the processing purposes, but you need them in order to institute, exercise or ground a legal action (e.g. to establish, exercise or defend your rights);
- the decision on your objection to the processing is pending.

In case of restriction of processing, your personal data will no longer be subject to any processing without your prior consent, except for storage of your data to institute, exercise or ground a legal action, or to protect another natural or legal person's rights, or for reasons of substantial public interest for the Union or a Member State.

In case of restriction of processing of your personal data, we will inform you before removing the restriction.

## 9. How to exercise your rights?

We would like you to be able to exercise your rights in the easiest possible way.

In order to exercise one of the afore-mentioned rights, simply send an e-mail to **credendodataprotection@credendo.com** indicating your full name. Please mention the right you wish to exercise in the subject field, and attach a copy of your ID card. Don't forget to mention in your e-mail the documents to which your question relates and the type of your request.

You can also exercise these rights by writing to us at the following address:

Credendo ECA  
for the attention of the Group Chief Human Resources Officer, Mrs Hautman, and/or  
for the attention of the Data Protection Officer, Mr Goossens,  
Rue Montoyerstraat, 3  
1000 Brussels  
Belgium

Your written request must be signed and accompanied by a photocopy of your ID card. The request must specify the address to which the response should be sent. A response will then be sent to you within one (1) month following receipt of the request or two (2) additional months if the request necessitates further research or if we receive a very high number of requests.

## 10. Will your personal data be transferred to other countries?



## Transfer of data within Europe

- > Personal data benefit from the same level of protection within the European Economic Area (i.e. the 28 member states of the EU, Iceland, Norway, Liechtenstein).
- > The list of the European entities in the group with which we share your data, and where they are established, is available on our website [www.credendo.com/about](http://www.credendo.com/about).



## Transfer of data outside Europe

Credendo ECA transfers, processes and stores your information on IT servers located in a certain number of countries outside Europe according to the methods mentioned below.

Please be aware that privacy protection and the rules allowing the authorities to access your personal data in these countries are not necessarily the same as those in Europe.

In order to ensure that you have a high level of requirement in terms of data and privacy protection, we impose technical and legal guarantees on all our subcontractors, partners, subsidiaries, etc.

CornerStone on demand, based in the United States, adheres to and respects the Privacy Shield principles. This is a self-certification mechanism for companies established in the United States that has been recognised by the European Commission as offering a legal guarantee for the transfer of personal data by a European body to companies established in the United States. To find out more about Privacy Shield, [click here](#).

Your information can also be transferred to Credendo's Russian entity, i.e. Credendo – Ingrosstrakh Credit Insurance. We have concluded an agreement with the entity requiring the same protection for your personal data as in Europe.

### 11. **Would you like to contact us about this personal data protection policy and/or to make a complaint to a data protection authority?**

Do you have any questions or suggestions regarding this personal data protection policy?

Please do not hesitate to contact us by e-mail at the following address:  
**[credendodataprotection@credendo.com](mailto:credendodataprotection@credendo.com)** or by post:

Credendo ECA  
for the attention of the Group Chief Human Resources Officer, Mrs Hautman, and/or  
for the attention of the Data Protection Officer, Mr Goossens,  
Rue Montoyerstraat, 3  
1000 Brussels

Belgium

We would be happy to hear from you and we will reply to you as soon as we can.

**> Do you think that we are not doing enough to protect your personal data?**

If you believe that Credendo ECA is not processing your personal data in accordance with the GDPR and with the applicable national regulations, you have the right to make a claim to:

- the data protection authority in the European country in which you normally reside; or
- the data protection authority in the European country in which you work; or
- the data protection authority in the European country in which the breach of the GDPR occurred.

**> Make a complaint to the Belgian Privacy Protection Commission (CPVP):**

- by post:  
Commission de la protection de la vie privée (the competent data protection authority)  
Rue de la Presse, 35  
1000 Brussels
- by e-mail: [contact@apd-gba.be](mailto:contact@apd-gba.be)

**> Make a complaint to another European data protection authority:**

To make a complaint to another data protection authority, please consult the website of the authority concerned.

## 12. How will you know if this personal data protection policy has been amended?

The personal data protection policy may be amended at any time, in particular to take account of any legislative or regulatory amendments.

When we publish amendments to this policy, we will revise the 'last update' date and we will give a description of the changes in the 'Change History' tab.

Please consult this policy regularly to see how we are protecting your personal data.

**> Change history**

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1.00 Final	25/05/2018	Initial version