Privacy Notice

This Privacy Notice ("Notice") describes how Grauhaus BV (we, us, our or Grauhaus) may use, process, store and disclose Personal Information that we may collect about individuals, including if you register with us via our Candidate Registration process, through this website and from other sources, such as when you apply for a job through job sites. The types of data we collect are described in the section below "Your Personal Information and how we collect it".

We act as a controller and we are responsible for the Personal Information we process. This Notice informs you how we protect your Personal Information and informs you about your privacy rights.

It is important that you read this Notice together with any other Privacy Notice we may provide such as the Notice contained in our Candidate Registration form, our privacy notice for employees and specific notifications provided to you on certain occasions when we are collecting or processing your Personal Information so that you are fully aware of how and why we are using your Personal Information. This Privacy Notice supplements other Notices you may receive from us and is not intended to override them.

This website is not intended for children and we do not knowingly collect data relating to children.

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Contact Details

If you have any questions about how we use your Personal Information, contact us at: Info@grauhausbrussels.com



Your Personal Information and how we collect it

Registering with this Website

When you use or register with this website, we may ask for certain Personal Information including your name and contact information (email, home address and phone number). Depending on the nature of your enquiry or activities on our website, we may also ask for your job search criteria and preferences, employment experience, salary, and other background information together with any login ID and password created by you. You can request us to send you Job alerts through the website by completing your job search criteria and preferences. You can stop receiving these job alerts at any time by clicking on the unsubscribe link contained in the job alert email. Previously registered Candidates may enter, at their discretion, their RH Candidate ID to facilitate the website registration process.

After your successful registration with our website, you will be able to access, review and change Personal Information provided by you at any time through the "Review Profile" feature of the website.

Registering as a Candidate for work finding services

We will collect your Personal Information directly from you and from other sources including when you apply for a job via a Job Board, directly through our website, from Social Media sites such as LinkedIn, Facebook and Twitter or when you provide us with your details during a job fair, promotional, networking or training event. When you ask us to provide you with work finding services we will ask you to register as a Candidate. During our Candidate Registration process we will collect your Personal Information directly from you, your CV, from employment and/or educational referees and via online tests you may perform at our request. We may disclose your Personal Information to our Clients in UK, Europe and outside the EEA for relevant job vacancies. Our Clients may request additional Personal Information about you in relation to their job vacancies and requirements. Your Personal Information will be securely stored in our online candidate database.

The categories of Personal Information we may collect include:

- your Identity (your full name, previous names, evidence of change of name); gender, date of birth and marital status);
- evidence of your right to work which may include a photograph, nationality, place of birth, driving license, etc (in accordance with legal requirements);
- contact details including your email, home address and phone numbers so that we can contact you by email and text message;
- bank account and social security details (so we can make payments to you and account for);
- Payroll information such as: your national registry number, your address, your seniority, your marital status, your bank account number, your family composition, your date of birth, your phone number, your email address
- your job search criteria, preferences and expectations;
- your qualifications, skills, experience and training;
- current remuneration and other benefits;
- educational history;
- employment history;
- details of employment and/or educational referees;
- The name of an emergency contact person;
- details of disabilities (where provided by you and if it is relevant);
- references;
- other information contained in your CV or that you choose to provide to us;

- technical data including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. We may also receive technical data about you if you visit other websites employing our cookies. Please see our Cookies Policy for further details;
- profile data including your username and password, your interests, preferences, feedback and customer survey responses;
- usage data including information about how you use our website and services;
- marketing and communications data including your marketing and communication preferences.

To provide you with work finding services our recruitment consultants will send you job alert emails matching your job search criteria and preferences. From time to time you may also receive job alerts which our consultants consider you may find interesting. You can stop receiving these job alerts at any time by clicking on the unsubscribe link contained in the job alert email.

Applicants for Employed Roles

If you are applying for a role as our employee, we will collect Personal Information from you via your CV, referees, professional and educational organisations and other sources. We will process your Personal Information for the purposes of administering the application, managing the internal hiring process and assessing your suitability. We will store your Personal Information securely in our confidential online HR database. Your Personal Information cannot be viewed or accessed by anyone except for members of HR and Talent Acquisition in the UK, Europe and the US and other staff if they are connected to the hiring process, such as interviewing, assessing your suitability for the role you have applied for and communicating with you. We do not share our HR database with any group companies and we will take steps to ensure that your Personal Information is adequately protected, secure and kept confidential. If we engage a third party to provide pre-employment screening services or testing, we will ensure that access is limited to the Personal Information that is compatible with those services and the service provider is contractually obliged to comply with applicable data privacy laws, confidentiality and provide adequate safeguards to keep your Personal Information secure until it is deleted or anonymised.

By applying for employment with us, you consent to us processing your Personal Information for these purposes. You have the right to withdraw your consent at any time. If you withdraw your consent, we will not be able to continue with your application.

If your employment application is unsuccessful, we will retain your Personal Information on our HR database for a period of 6 months for the purposes of evidencing that we have conducted the recruitment process in a fair and transparent way and have not discriminated against applicants on prohibited grounds. At the end of the retention period, your Personal Information will be automatically deleted. Occasionally we may ask if you would like us to retain your CV data if we consider that you may be suitable for future roles. We will only do this with your consent.

Special Categories of Personal Information

Information about your health and/or judicial/criminal records will only be processed if this is relevant to your job application (for example to enable us to assess whether these present grounds for not taking your candidate registration or job application further) and in compliance with legally imposed restrictions.

This information will be retained for no longer than necessary before being deleted.

Our Clients and Suppliers

If you are a Client or supplier or a potential client or supplier, of goods and services we will collect and process information about individuals in your organization. We may enter the individual's name and business email address in to our database as a designated corporate point of contact for that organization, together with the individual's other business contact data. Usually the only Personal Information we process about a corporate contact is the individual's name for the purposes of contacting the organization in relation to our services (and authorising time sheets) or the supplier as a recipient of the supplier's goods and services. If the individual corporate point of contact is also a registered candidate we may be processing additional Personal Information for work finding and other purposes as described in this Privacy Notice. The source of a corporate point of contact may be the individual themselves, or their name and business details may be provided to us by a member of their HR or Procurement department or another hiring manager or existing business contact or a candidate we have placed at the organization. We may also obtain these details from websites, social media and other sources. We may send business to business marketing to corporate points of contact. An individual corporate point of contact can ask us at any time to stop sending business marketing emails to their business email address by contacting: Info@grauhausbrussels.com

Website visitors

We collect a limited amount of information about our website users, which we use to help us improve your experience with our website and manage our services.

The following information will be collected:

- technical data including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. We may also receive technical data about you if you visit other websites employing our cookies. Please see our Cookies Policy for further details;
- profile data including your username and password, your interests, preferences, feedback and customer survey responses;
- usage data including information about how you use our website and services;
- marketing and communications data including your marketing and communication preferences.



How we use your Personal Information

We use, process, store and disclose your Personal Information and other data we collect including during our Candidate Registration process, to provide you with work finding services including sending you job alerts through this website and by email, temporary assignments, project related work and permanent and fixed term contract placements in finance, accounting, technology, administrative, legal, marketing and other related roles, employment opportunities and career-related information. Grauhaus will process your Personal Information in accordance with this declaration as well as with the information made available in other documents provided to you, applicable to the type of work you are seeking.

In the context of our services we can disclose your data to our customers. We limit the information that we provide to those that are necessary to assess your suitability for the vacancy (e.g. name, education, experience, etc.).

Personal data that you have provided to us is visible to all employees in Belgium who are required to reasonably have access to this data for the execution of their role, even if you have sent your information to a particular office.

We will also process your Personal Information for other legitimate business purposes such as producing statistics, analyzing how successful our marketing campaigns are, the number of visitors to our website and complying with other contractual, legal and regulatory obligations and duties.

We do not use automated decision-making technologies to make final or conclusive decisions about you and a member of our staff will always be involved in the provision of working finding services. Personal data you have provided to us is available for all employees in Belgium, even if you provided your information to one specific agency.

Change of Purpose

We will only use your Personal Information for the purposes for which we collected it (e.g. the provision of work finding services if you are a candidate or to consider you for employment if you are a job applicant), unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your Personal Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law. Where this is the case, we will comply with the rules contained in this Statement as well as in the relevant legislation.



Disclosing your Personal Information to 3rd Parties

To the extent necessary or appropriate, Grauhaus may disclose your Personal Information to external 3rd Parties (who are not members of the Grauhaus group of companies) in the following circumstances:

- to our clients in the context of private employment mediation (temporary employment and/or recruitment).
- to our customers in the context of social elections, in accordance with the restrictions of the applicable legislation. In particular, the following information can be passed on to the customer: your name, your (e-mail) address, your date of birth, your status, your period of employment with the customer as well as your national register number (if this is necessary to identify in case of electronic voting).
- to companies and individuals we employ to perform business functions and services on our behalf.

Examples of service providers include: providing payroll services to enable us to pay our employees and temporary workers who work on client premises; background screening and verification services; data storage facilities including in the US and the Cloud; hosting our Web servers; managing job posting applications via our 3rd party provider Broadbean; analyzing data and producing statistics and legal, accounting, audit and other professional services.

- To companies that perform screening for us. Examples of such services include: screening against terrorism and other sanction lists, screening of your background and investigations requested by certain customers. Such screenings take place only to the extent permitted by law.
- to government agencies including: Police and other law enforcement agencies; regulatory and supervisory authorities; credit reference agencies and 3rd parties performing sanctions and terrorism checks.
- to comply with applicable laws, the service of legal process, or if we reasonably believe that such action is necessary to: (a) comply with the law requiring such disclosure; (b) protect the rights or property of Grauhaus or its group companies; (c) prevent a crime, protect national security or for fraud detection or prevention; or (d) protect the personal safety of individuals using our website or members of the public.
- to 3rd parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, we will let you know.
- to IT consultants carrying out testing and development work on our IT systems, service providers who we may appoint as data processors and to other service providers who may be based outside the EEA.

Where applicable, we will impose appropriate contractual, security, confidentiality and other obligations on to 3rd party service providers and processors we have appointed, based on the nature of the services they provide to us. We will only permit them to process your Personal Information in accordance with the law and our instructions. We do not allow them to use your Personal information for their own purposes and when our relationship ends we will ensure your Personal Information is securely returned or destroyed (or anonymized so that you no longer can be identified).

Some of these 3rd parties are also controllers responsible for processing your Personal Information for their purposes, for example, the local tax authority is a controller for tax purposes. We may not be able to impose obligations or restrictions on these controllers in connection with how they process your Personal Information.

The above mentioned third parties may be located both within and outside the EEA. In the latter case, we will take the necessary measures as described above.

Keeping your Personal Information Secure

We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to do so.

We have put in place procedures to deal with any suspected Personal Information breaches and we will notify you and the applicable supervisory authority of a breach where we are legally required to do so.

How long we Retain your Personal Information

Grauhaus will retain your Personal Information for as long as necessary to fulfil the purposes that we collected it for. This means we will keep your Personal Information throughout the period of your relationship with us and whilst we are providing you with work finding services.

If you no longer wish to receive our services you can request us to delete your Personal Information from our Candidate database. When we have deleted your data, we may retain your name and email address on our suppression list and subject to the services we have provided, continue to retain some of your Personal Information for our legitimate business purposes described below.

If you have not been placed in a job by us, your data will be stored up to 2 years after the final contact. At the end of this period, you will be contacted again to decide whether you want to continue to be registered at our offices. During this period we can anonymize your Personal Data in our database so that we can no longer identify you.

If you have been placed in a job by us, your data will be stored up to 5 years after signing the last contract. At the end of this period, you will be contacted again to decide whether you want to continue to be registered at our offices.

We are required by law to keep basic information about our, independent contractors (Management resources), Clients and customers (including contracts, evidence of identity, financial and transaction data) for up to 10 years from when our relationship ends, for legal, compliance and tax purposes.

Your personal data will in any case be stored in compliance with the law and the limitation periods that oblige us to store your personal data for a longer period, e.g. to defend ourselves against any legal actions.

Where there is no retention period stated in law, we determine the appropriate retention period for Personal Information by considering the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of the data, the purposes for which we process it and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymize your Personal Information (so that it can no longer be associated with you and we cannot identify you). We do this for research or statistical purposes in which case we may use this anonymized data indefinitely without further notice to you.

Details of the retention periods for different aspects of your Personal Information are set out in our Record Retention and Destruction Policy which you can request from us by contacting us at: info@grauhausbrussels.com



Your Legal Rights

You have the right to:

- Make a Data Subject Access Request to access your Personal Information at any time. This enables you to receive a copy of the Personal Information we hold about you and to check that we are lawfully processing it.
- Request correction of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate Personal Information we hold about you corrected, although we may need to verify the accuracy of the new data you provide to us.
- Request erasure / deletion / removal of your Personal Information. This enables you to ask us to delete or remove your Personal Information where we do not have a valid reason to continue to process it. You also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your Personal Information to comply with local law. Please Note: we may not always be able to comply with your request for erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your Personal Information where we are relying on a legitimate interest (or those of a 3rd party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Information for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to process it.
- Data Portability / Request the transfer of your Personal Information to you or to a 3rd party. We will assist you with this transfer to a 3rd party either by transferring your Personal Information for you or by providing you with a copy in a machine-readable format. Please Note: this right only applies to automated information which you initially provided consent for us to use or where we used the Personal Information to perform a contract with you. The data we can provide is:

Report Title	Candidate Information
Personal Details	 Full name, address, phone number, e-mail (business/personal), nationality, place of birth, birthdate, gender. Online presence URLs. Emergency contact name and phone.
Eligibility Details	 National ID, tax information. Work visa/passport details. Full name, work phone number and company name of job references.
Skills	 Skills and skill test results. Education certifications and qualifications with dates. Renumeration. Industries worked in.
Work History	Work history (employer, job title/function, employment dates).
Job/role Placement	Job placement/employment (company, job title/function, start date, end date, compensation/pay rates, worksite addresses).



• Withdraw consent at any time where we are relying on your consent to process your Personal Information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

We want to ensure we keep your Personal Information accurate and up to date. In addition to your legal rights, you may ask us to make changes or request a copy of your Personal Information informally, by contacting your local Grauhaus branch.

Additional information, Response Times and Fees

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights or when you make an informal request). For example, we may request additional information or request a copy of your identity document. This is a security measure to ensure that Personal Information is not disclosed to any person other than the individual who has the right to receive it. We may also contact you to ask you for further information in relation to your request to help us locate your data and to speed up our response.

We try to respond to all legitimate requests within one month. It may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You will not have to pay a fee to exercise any of these rights. However, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.



The Legal Basis for processing your Personal Information

We have set out a short description of main ways we will collect, store, process, share and disclose your Personal Information and the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

We will only use your Personal information when the law allows us to. Most commonly, we will use your Personal information in the following circumstances:

- To fulfil a contract we are about to enter into or have entered into with you;
- Where it is in our legitimate interests;
- When it is our legal or regulatory duty;
- When you consent.

A legitimate interest is when we have a business or commercial reason to use your information in conducting and managing our business. We will consider and balance any potential impact on you and your legal rights when we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required for compliance with a legal or regulatory obligation or permitted to by law).



Purpose/Activity	Type of Personal Information	Lawful basis for processing Personal Information
To register you as a candidate for work finding services or when you make an employment application to us your Personal Information to government and law enforcement agencies and our appointed 3rd party vendors providing goods and services. including vendors located outside the EEA and providing Cloud based services	 A. Identity B. Contact details C. Evidence of your right to work D. CV E. Referees F. Qualifications G. Renumeration 	 Fulfil a contract Legal or regulatory duty To administer your registration or employment application
To provide you with work finding services including: sending you details of available job opportunities and job alert emails in accordance with your job search preferences and criteria, providing career advice, providing your CV to clients in relation to their job vacancies / roles), paying your wages (if you are a temporary worker) and charging clients for placements we make.	 A. Identity B. Contact details C. Financial data D. Transaction data E. Marketing and Communications F. Payroll information G. Qualifications H. CV I. References J. Diplomas 	 Fulfil a contract Legitimate interests Legal or regulatory duty Your consent
Transferring your Personal Information to our group companies (including Protiviti) and to our other group companies.	A. Identity B. Contact details C. Evidence of your right to work D. CV E. Referees F. Qualifications G. Financial data	 Legitimate interests (We must forward your data because of the structure of our company as well as our IT structures) including work finding services Your consent
Disclosing your Personal Information to government and law enforcement agencies and our appointed 3rd party vendors providing goods and services. including vendors located outside the EEA and providing Cloud based services	 A. Evidence of your right to work B. CV C. Referees D. Qualifications E. Financial data F. 	 Legitimate interests (to run our business) Legal or regulatory duty
To manage our relationship with you including:	 A. Notifying you about changes to our Candidate Agreement or Privacy Notices B. Asking you to leave a review or feedback or complete a survey C. administration and IT services connected with representing you for roles, placing you in temporary assignments to work for our clients, processing timesheets, payroll and other payments, tax deductions, issuing pay slips, etc. D. Identity E. Contact F. Profile/Survey G. Marketing and Communications 	 Fulfil a contract Legal or regulatory duty Legitimate interests (keeping our records updated and to study how candidates and potential candidates and visitors to our website use our services and website, to develop and improve them and to grow our business
Keeping your Personal Information secure to prevent it from being lost, used, accessed, disclosed or altered in an unauthorized way	 A. Identity B. Contact details C. Evidence of your right to work D. CV E. Referees F. Qualifications 	 Legal or regulatory duty Fulfil a contract

	G. Remuneration	
To investigate issues, disputes and complaints between us, and between us, you and our clients and to respond to them and to seek to resolve them	 A. Identity B. Contact details C. Profile D. Usage data E. Marketing and Communications F. Evidence of your right to work G. CV H. Referees I. Qualifications J. Remuneration 	 Legitimate interests (to protect our company against liability) Defense against legal claims Fulfil a contract
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	A. Identity B. Contact C. Technical data	 Legitimate interests (keeping our business and website safe) Legal or regulatory duty
For Marketing and communications, make suggestions and recommendations to you about other relevant services that may be of interest to you (e.g. the Grauhaus Newsletter, Salary Guides, Online training	A. Identity B. Contact C. Technical data D. Usage data E. Profile data	 Legitimate interests (send you salary guides and other relevant information) Your consent.
To deliver relevant website content and measure or understand the effectiveness of our advertising	 A. Identity B. Contact C. Profile data D. Usage data E. Marketing and Communications F. Technical data G. 	 Legitimate interests (to study how customers use our products/services/website, to develop them, to grow our business and to inform our marketing strategy) Your consent
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	 A. Technical data B. Usage data C. Profile data 	 Legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
Retaining your Personal Information for as long as necessary for the purposes of providing you with work finding services or to manage the internal hiring process for employed roles.	 A. Identity B. Contact details C. Profile D. Usage data E. Marketing and Communications F. Evidence of your right to work G. CV A. Referees B. Qualifications C. Financial information D. Payroll information 	 Legitimate interests (to run our business) Legal or regulatory duty
To help us respond to queries, complaints or for other reasons such as responding to requests from regulators, government and law enforcement agencies such as the Police	A. Contact	 Legitimate interests (to run our business) Legal or regulatory duty



Marketing Messages

Generally we do not rely on consent as a legal basis for processing Personal Information except in relation to sending direct marketing communications via email or text message. However, where we are providing you with work finding services, you will receive email marketing communications from us even if you have not given us consent as we rely on the 'soft opt in' form of consent.

We will ask you for consent to send your direct marketing communications via email. We have established an email preference center where you can view and make decisions about your email marketing preferences and opt out of receiving email marketing from us at any time.

You may receive marketing communications from us if you provided us with your details when you entered a competition or registered with us at a job fair, promotional or networking event or attended a training course and you have given us consent to send you marketing. If you give us consent, we may also use your identity, contact details, technical data, usage data and profile data to form a view and decide which services may of interest or relevant for you.

You have the right to withdraw your consent to marketing at any time by:

- Visiting our website;
- Following the opt out links contained in our marketing email messages;
- Following the opt out process described in our text marketing messages;
- Sending an email with "UNSUBSCRIBE ME" in the subject field to: info@grauhausbrussels.com.

Opting out of receiving marketing messages does not apply to:

- Personal Information that you have provided to us as a result of your request for work finding services;
- Personal Information that you have provided to us in connection with the performance of a contract between us;
- Job alerts sent to you through the website in response to your request to receive specific job details. You can select your preferences in the Job Search section and you can stop receiving these alerts at any time by clicking on the unsubscribe link within the job alert email; and
- Job alert emails which you will receive from our recruitment consultants which match your job search criteria confirmed with you during our Candidate Registration process. If you no longer wish to receive working finding services please contact us at: info@grauhausbrussels.com

We will never sell or disclose your Personal Information to any 3rd parties to use for marketing.



Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or

