

SANDER - Privacy Policy ENGLISH

Sander & Partners attaches great importance to the data it collects. For this reason, we comply with Regulation (EU) 2016/679 of the European Parliament and of the Council 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 the « **Regulation** »). The processing of your data also complies with the transposition law of 30 July 2018 on the protection of natural persons with regard to the processing of personal data.

The purpose of this « **Privacy policy** » is therefore to define the way in which we process your data, if any, while setting out the limits of its processing in accordance with the regulations in force.

We therefore undertake to respect the rights and obligations arising from the legal provisions by transparently explaining the processing of the data we collect.

1. The data controller

Sander & Partners SRL (hereinafter the « **Controller** » or « **Sander & Partners** »), with its registered office at Avenue Louise 523, 1050 Brussels, registered as a legal entity in Brussels under number 0736.369.659, is the Controller of the personal data.

2. Consent

Your consent to the use of your data is important to us. Therefore, every time you access our website <https://www.wearesander.com> (hereinafter the « **Website** ») you give your consent by clicking the box referring to the hyperlink in this Privacy policy. By doing so, you declare that you are aware of and give your free, specific and unambiguous consent to the processing of your personal data.

Your consent covers the entire contents of this Privacy policy.

3. The data processed by Sander & Partners

The processing and collection of your personal data may vary depending on the relationship we have with you or the stage of the recruitment process to which you may be subject.

For example, in order to provide you with a quality service and to ensure the proper execution of our services, we may collect information when you apply for a job posting on our Website or social networks, participate in an online survey, contact us (including through social media), participate in an online survey or otherwise interact with Sander & Partners.

This includes information about your first and last name, e-mail address, mailing address, telephone number, and relevant work experience.

However, in accordance with the prohibition set out in Article 9 of the Regulation, we do not collect so-called “sensitive” data, such as national registration numbers or special categories of data, such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sexual life or sexual orientation.

In order to improve the experience and facilitate the use and ergonomics of our Website, we also collect data that are purely technical, but which are also of a personal nature. This includes the IP address or domain names of the computers used by users of our Website, URI (Uniform Resource

Identifier) addresses, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's response (successful, error, etc.), the country of origin, the number of pages viewed, the number of pages viewed, the number of pages viewed and the number of pages viewed.), the country of origin, the characteristics of the browser and operating system used by the user, the various details of the time per visit (e.g. time spent on each page in the Application) and the details of the path followed in the Website with special reference to the sequence of the pages visited, and other parameters relating to the user's operating system or computer environment.

For more information, please refer to our Cookie Statement.

4. Purposes and legal basis of your collected data and retention period

At Sander & Partners we are concerned about how your personal data is used. For this reason, we will only use your data when your consent has been given. Our purposes are as follows:

1. For the performance of our pre-contractual and contractual obligations, we may also process your personal data in the context of the performance of a contract to which you are a party or for the performance of pre-contractual measures taken in connection therewith. We process your data when you submit an application or when you contact one of our employees for information purposes;
2. For communication or commercial prospecting purposes. You agree that your data may be processed for :
 1. contact you about our services or upcoming events or provide/request relevant information (legitimate interest);
 2. for canvassing by the Controller or by a contractually bound third party (legitimate interest) ;
3. For our legitimate interests. Your data may also be processed for the purposes of our legitimate interests while ensuring that your fundamental freedoms are respected;
4. Comply with the law. This includes complying with the legal provisions in force or when legislation imposes certain obligations (tax, fraud, etc.).

For each processing operation, only the data relevant to the purpose is processed. We will only keep your personal data for as long as is necessary to fulfil the purposes for which they are processed.

In this way, we periodically examine whether the data collected still meets the purposes described above.

5. Technical measures to protect your data

We also attach great importance to the security of your data. To this end, appropriate technical and organisational measures are implemented to ensure that data is processed in such a way as to guarantee its protection against loss, destruction or accidental damage that could impair its confidentiality or integrity.

Access to your personal data is only permitted to those persons for whom this is necessary for the performance of their duties. These persons are specially trained in the use of your data and are subject to a strict obligation of confidentiality.

We have put in place technical measures to ensure an optimal level of protection for your personal data. Our aim is to prevent unauthorised persons from accessing, processing, modifying or destroying your personal data.

6. Who has access to your data and how it is transferred

The persons or entities authorized to access your data are determined precisely according to their mission. In the following cases, we will communicate certain personal data to third parties such as :

- Public authorities: whenever required by law or requested by a duly mandated public authority;
- Subcontractors acting on our behalf, including marketing and communication companies;
- IT service providers providing us with technical support;
- Lawyers or advisors: in some cases, the Controller may pass on your personal data to external advisors or lawyers or insurers if this is necessary to defend our interests.

Where we use specialist third party companies to provide certain services, these companies must comply with the same processing requirements set out in this Privacy Policy. We ensure that our partners only receive data that is strictly necessary for the performance of their obligations.

7. Your personal data protection rights and how to exercise them

We attach great importance to your rights when processing your personal data. These rights guarantee you a fair and transparent treatment in the way your personal data is processed.

7.1. Right of access

Naturally, you have a right of access to your personal data, i.e. you can ask us to inform you of the personal data we hold and the purposes for which they are processed.

7.2. Right to rectify your data

Naturally, you have a right of access to your personal data, i.e. you can ask us to inform you of the personal data we hold and the purposes for which they are processed.

7.3. Right to erasure

In accordance with Article 17 of the Regulation, you may also ask us to delete your personal data.

7.4. Right to withdraw your consent

You have the right to ask us to restrict the processing of your personal data for the necessary period to verify the data in accordance with Article 18 of the Regulation.

7.5. Right to object

You have the right to object to the processing of your personal data where you do not agree with the way we process certain of your data in accordance with our legitimate interests (Article IV). However, this right to object may be refused for compelling reasons such as compliance with our legal obligations.

7.6. Right of portability

You have the right to receive the personal data you have provided to us.

7.7. Right to withdraw your consent

You have the right to withdraw at any time the consent you have given us for the processing of your personal data. Withdrawal of this consent is only valid for the future and does not affect data already processed.

7.8. Exercising your rights

To exercise your rights, all you have to do is send us your request, indicating the right you wish to exercise. The request must be dated, signed and accompanied by a copy of a document proving your identity by mail to the person in charge of processing at the following address:

Sander & Partners

Avenue Louise 523,
1050 Brussels
E-mail: contact@wearesander.com

The right to lodge a complaint with the Data Protection Authority

If you are not satisfied with the processing of your data by Sander & Partners, you can lodge a complaint to the Data Protection Authority at the following address:

Data Protection Authority

Rue de la Presse 35,
1000 Brussels
E-mail: contact@apd-gba.be

8. Contact us

If you have any questions about the processing of your personal data, we will do our best to answer them. We can be reached at the following address:

Sander & Partners

Avenue Louise 523,
1050 Brussels
E-mail: contact@wearesander.com