



PRIVACY POLICY YOURCONNECTOR

YourConnector works extensively with personal data of candidates, clients, employees and (chain) partners. Candidates, clients, employees and (chain) partners are referred to in the further document as: “collaboration partner(s)” or “person(s) involved”¹.

Personal data is mainly collected for the proper execution of the agreed activities between YourConnector and the partners. The collaboration partner must be able to trust that YourConnector will handle personal data carefully and securely.

During this time, YourConnector is also keeping up with new developments. New technological developments, innovative facilities, globalization and more and more digital connections place different demands on data protection and privacy. YourConnector is aware of this and ensures that privacy is guaranteed, including by taking measures in the field of information security, data minimization, transparency and user control.

The board and management within YourConnector play a crucial role in guaranteeing privacy. Through this policy, YourConnector provides clear guidance on privacy and shows that it guarantees, protects and maintains privacy. This policy applies to the entire organization, all processes, components, objects and data collections of YourConnector. This privacy policy of YourConnector is in line with the relevant national and European laws and regulations.

Legal frameworks for handling data

YourConnector is responsible for drawing up, implementing and enforcing the policy. The following legal frameworks apply, among others:

- the General Data Protection Regulation (GDPR), and
- the Implementation Act of the General Data Protection Regulation.

Assumptions

YourConnector handles personal data securely and respects the privacy of its partners. YourConnector adheres to the following principles:

Legality, fairness, transparency

Personal data is processed in accordance with the law and in a proper and careful manner.

Basis and purpose limitation

YourConnector ensures that personal data is only collected and processed for specific, explicitly described and legitimate purposes. Personal data will only be processed on a fair basis.

¹ Candidates, clients, employees and (chain) partners will, if their personal data is processed by YourConnector, be regarded as *person involved* within the meaning of the GDPR.



Data minimization

YourConnector only processes the personal data that is minimally necessary for the predetermined purpose. YourConnector strives for minimal data processing. Where possible, less or no personal data is processed.

Retention period

Personal data is not kept longer than necessary. The storage of personal data may be necessary to properly perform the agreed activities and tasks of YourConnector or to comply with legal obligations.

Integrity and confidentiality

YourConnector handles personal data with care and treats it confidentially. For example, personal data is only processed by persons with a duty of confidentiality and for the purpose for which this data was collected. YourConnector ensures appropriate security of personal data. This security is laid down in the information security policy.

Sharing with third parties

In the case of collaboration with external parties that involve data processing of personal data, YourConnector makes agreements about the requirements that data exchange must meet. These agreements comply with the law. YourConnector checks these agreements annually.

Subsidiarity

To achieve the purpose for which the personal data are processed, infringement of the personal privacy of the data subject is limited as much as possible.

Proportionality

The infringement of the interests of the data subject may not be disproportionate in relation to the processing of the purpose to be served.

Rights of data subjects

YourConnector respects all rights of those involved.

This privacy policy comes into effect after adoption by the management of YourConnector. The policy is evaluated every year and revised if necessary.

Changes to this policy will be announced via our newsletter. The most current version of the policy can be found at (www.yourconnector.nl).

As determined by the management of YourConnector on May 24, 2018,

Nicole Solleveld
Founder



PRIVACY REGULATION YOURCONNECTOR

In these regulations, YourConnector shows how it deals with personal data and privacy on a daily basis, and what is and is not legally responsible. Privacy plays an important role in the relationship between YourConnector and its partners and is therefore high on the agenda. Companies have responsibility for personal data and data exchange in all areas where they are active. Companies are obliged to handle the collection, storage and management of personal data of their partners carefully and securely, proportionately and confidentially. This applies to YourConnector for activities and tasks in the field of administration, human resources, employer branding, leadership, (executive) coaching and culture. Handling personal data properly and carefully is a daily activity of companies. Protecting privacy is complex and is becoming increasingly complex due to technological developments, globalization, major security challenges and new European legislation. That is why YourConnector believes it is important to be transparent about the way we handle personal data and to guarantee privacy.

1. Legislation and definitions

The General Data Protection Regulation (GDPR) regulates the legal framework for handling personal data in the Netherlands. On May 25, 2018, the Personal Data Protection Act (Wbp) will expire and the GDPR will come into effect, together with the implementation law. The GDPR builds on the Wbp and, among other things, strengthens and expands privacy rights with more responsibilities for organizations.

The following terms are used in the GDPR (Article 4 GDPR):

Data subject: The person to whom the personal data relates. The data subject is the person whose data is processed.²

Processor: The person or organization that processes the personal data on behalf of another person or organization.

Personal data: All data that concerns people and that allows you to recognize a person as an individual. This not only concerns confidential data, such as about someone's health, but any data that can be traced back to a specific person (for example, name, address, date of birth). In addition to ordinary personal data, the law also recognizes special personal data. This is data about sensitive topics, such as ethnic background, political preferences or the Citizen Service Number (BSN).

² Candidates, clients, employees and (chain) partners are referred to in YourConnector's Privacy Policy as: "collaboration partner(s)" or "data subject(s)". Candidates, clients, employees and (chain) partners will be regarded as data subjects within the meaning of the GDPR if their personal data is processed by YourConnector.



Data Protection Impact Assessment: A data protection impact assessment assesses the effects and risks of new or existing processing on the protection of privacy. This is also called a Privacy Impact Assessment (PIA).

Controller: A person or body that alone, or jointly with another person, determines the purposes and means of the processing of personal data.

Processing: Processing is everything you do with personal data, such as: recording, storing, collecting, combining, providing to another person, and destroying it.

Responsible: the private limited liability company YourConnector B.V., registered with the Chamber of Commerce under file number 64695832.

Contact:

Mrs Aleid Haenen,
office address: Keurenplein 4, Unit D6196, 1069 CD, Amsterdam,
email: team@yourconnector.nl

2. Scope

The regulations apply to all processing of personal data by YourConnector.

3. Responsible person

The private company with limited liability YourConnector B.V., registered with the Chamber of Commerce under file number 64695832.

Mrs Aleid Haenen,
office address: Keurenplein 4, Unit D6196, 1069 CD, Amsterdam,
email: team@yourconnector.nl

4. Processing (Article 4 GDPR)

The processing of personal data is any operation or set of operations involving personal data, whether or not carried out by automated processes. In the GDPR, processing includes:

- collecting, recording and organizing.
- save, update and modify.
- use query, consult.
- by means of transmission regardless of the means of transmission.
- distribution or any other form of making available.
- to bring together, to relate to each other.
- blocking, erasing or destroying data.

This summary shows that everything you do with personal data is processing.



Purposes (Article 5 GDPR)

According to the law, personal data may only be collected if a purpose has been determined for this. The purpose must be explicitly defined and justified. The data may not be processed for other purposes. For the implementation of some laws, the purposes for processing have already been laid down in the law, as have the personal data that may be requested and processed.

Lawful basis (Article 6 GDPR)

The law states that any processing of personal data must have a lawful basis under the law. This means for YourConnector and the data subject that processing may only take place:

- to fulfill an obligation stated in the law.
- for the execution of an agreement of which the data subject was part.
- for the proper fulfillment of the agreed activities between YourConnector and the person(s) involved or YourConnector's task in relation to the person concerned.
- when the data subject has given consent for the specific processing.

Method of processing

The main rule of the processing of personal data is that it is only permitted in accordance with the law and in a careful manner. Personal data is collected as much as possible from the data subject himself. The law is based on subsidiarity. This means that processing is only permitted when the purpose cannot be achieved in any other way.

The law also talks about proportionality. This means that personal data may only be processed if this is proportionate to the purpose. If the same goal can be achieved with no or less (incriminating) personal data, this should always be chosen.

YourConnector ensures that the personal data is correct and complete before it is processed. This data is only processed by persons with a duty of confidentiality. In addition, YourConnector protects all personal data. This should prevent the personal data from being viewed or changed by someone who does not have the right to do so.

Transfer³ (articles 44 to 50 AVG)

YourConnector only transfers personal data to a country outside the European Economic Area (EEA) or an international organization if provision is made for:

- a. agreements approved by the European Commission, or
- b. the third country is identified by a decision of the European Commission ('adequacy decision') as having an adequate level of protection, meaning that data can be transferred to another company in that third country without the data exporter having to provide further safeguards offer or have to meet additional conditions, or

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https://ec.europa.eu/info/law/law-topic/data-protection/reform/rules-business-and-organisations/obligations/what-rules-apply-if-my-organisation-transfers-data-outside-eu_nl



- c. an offer of appropriate guarantees⁴ and provided that individuals have enforceable rights and effective remedies.
- d. - where transfers of personal data are planned to third countries not covered by an adequacy decision and where appropriate safeguards are lacking - transfers are made on the basis of a number of derogations for specific situations, for example where an individual has expressly consented to the proposed transfer after having given all has received the necessary information about the risks associated with the transfer.

5. Transparency and communication

Information obligation (Articles 13 and 14 GDPR)

YourConnector informs those involved about the processing of personal data. When data subjects provide data to YourConnector, they are informed of the way in which YourConnector will handle personal data.

The data subject will not be informed again if he/she already knows that YourConnector collects and processes personal data from him/her, and knows why and for what purpose this happens.

If the data is obtained through another means, i.e. without the data subject's involvement, the data subject will be informed when it is processed for the first time.

Removal

YourConnector does not store personal data for longer than is necessary for the performance of the mutually agreed activities and tasks. If personal data is still stored that is no longer necessary to achieve the purpose, it will be deleted as quickly as possible. This means that this data is destroyed or modified in such a way that the information can no longer be used to identify someone.

Rights of data subjects (Articles 13 to 20 GDPR)

The law not only determines the obligations of those who process personal data, but also determines the rights of the persons whose data is processed. These rights are also called the rights of data subjects and consist of the following rights:

- Right to information: Data subjects have the right to ask YourConnector whether his/her personal data is being processed.
- Right of access: Data subjects have the opportunity to check whether and how his/her data is processed.

⁴ Such appropriate safeguards include:

- in the case of a corporate group or a grouping of companies engaged in a joint economic activity, companies may transfer personal data on the basis of so-called binding corporate rules,
- contractual arrangements with the recipient of the personal data, for example using standard contractual clauses approved by the European Commission,
- adherence to a code of conduct or certification mechanism, together with obtaining binding and enforceable commitments from the recipient to implement appropriate safeguards to protect the data transferred.



- Right to correction: If it becomes clear that the data is incorrect, the data subject can submit a request to YourConnector to correct this.
- Right to object: Data subjects have the right to ask YourConnector to no longer use their personal data.
- Right to be forgotten: In cases where the data subject has given permission to process data, the data subject has the right to have the personal data deleted.
- Right to object: Data subjects have the right to object to the processing of his/her personal data. YourConnector will comply with this unless there are legitimate grounds for the processing.

Submitting request

The data subject can submit a request to exercise his/her rights. This request can be submitted in writing or by e-mail. YourConnector has four weeks from receipt of the request to assess whether the request is justified. YourConnector will let you know what will happen to the request within four weeks. If the request is not followed, you have the option to object to YourConnector, or to file a complaint with the Dutch Data Protection Authority (AP). Based on a request, YourConnector can request additional information to ensure the identity of the data subject.

6. Automated processing

Big data and tracking

By means of Big data research and tracking, data may only be processed if it cannot be traced back to a natural person. In addition, they are only collected for research conducted by, or on behalf of, YourConnector. The data collected by Big data research and tracking is only the data collected by authorized persons. When the data is converted into a dataset, data minimization will be applied. This means that only the data that is really necessary to achieve the goal will be used. In addition, personal data can be pseudonymised so that they cannot be traced back to a person.

YourConnector uses Big data and tracking. We do this by using Google Analytics. In YourConnector's Cookie Statement, which you can find attached as **attachment 1** in this privacy policy, contains a different explanation, including which cookies are used.

7. Obligations of YourConnector

Register of processing operations (Article 30 GDPR)

YourConnector is responsible for creating a register of all processing operations for which YourConnector is the controller. Each register contains a description of what takes place during processing and what data is used for this, namely:

- the name and contact details of the controller and, possibly, the joint controller.
- the purposes of the processing.
- a description of the type of personal data and the associated data subjects.
- a description of the recipients of the personal data.



- a description of the sharing of personal data to a third country or international organization.
- the periods within which the various personal data must be deleted
- a general description of the security measures.

Data Protection Impact Assessment (Article 35 GDPR)

A data protection impact assessment assesses the effects and risks of new or existing processing on the protection of privacy. YourConnector carries out this when automated processing, large-scale processing, or large-scale monitoring of public spaces takes place. This applies in particular to processing operations that use new technologies.

Appointment of a Data Protection Officer (DPO) (Articles 37 to 39 GDPR)

YourConnector has not appointed a DPO.

Data leaks (Articles 33 and 34 GDPR)

We speak of a data breach when personal data falls into the hands of third parties who are not allowed to have access to that data. If a data breach has occurred, YourConnector will report this to the AP without unreasonable delay, no later than 72 hours after becoming aware of the breach. If this is later than 72 hours, a justification for the delay will be added to the notification. The infringement may pose a high risk to the rights and freedoms of those involved. In this case, YourConnector reports this to those involved in simple and clear language. To prevent future data leaks, existing data leaks are evaluated.

Closing

If YourConnector fails to comply with a legal obligation, the person concerned can submit a complaint to the contact person specified in these regulations, Ms. Aleid Haenen.



APPENDIX 1 COOKIE STATEMENT YOURCONNECTOR

What is a cookie?

YourConnector uses cookies on its website. A cookie is a simple small file that is sent with pages from this website and stored by your browser on the hard drive of your computer. The information stored therein can be sent back to YourConnector's servers on a subsequent visit.

Use of permanent cookies

With the help of a permanent cookie, YourConnector can recognize you when you next visit our website. The website can therefore be set up specifically to your preferences. Even if you have given permission to place cookies, YourConnector can remember this by means of a cookie. This means you do not have to repeat your preferences every time, so you save time and can use the YourConnector website more pleasantly. You can delete permanent cookies via the settings of your browser.

Use of functional/session cookies

With the help of a functional/session cookie, YourConnector can see which parts of the website you have viewed during this visit. YourConnector can therefore adapt its service as much as possible to the surfing behavior of its visitors and therefore you. These cookies are automatically deleted as soon as you close your web browser.

Analytical cookies

With the help of these cookies we can see which parts of the website you have visited and which elements of the website you have paid attention to. We can therefore adapt our service as much as possible to the surfing behavior of our visitors. We do not sell your data to third parties and use our cookies purely to increase the user-friendliness of our website.

Social Media buttons

The YourConnector website contains buttons to promote ("like") or share ("tweet") web pages on social networks such as Facebook and Twitter. These buttons work using pieces of code that come from these social networks themselves. Cookies are placed through this code. YourConnector has no influence on this. Read the privacy statement of these social networks (which can change regularly) to read what they do with your (personal) data that they process via these cookies.

Right to access, correct and delete personal data:

Right to inspect and correct or delete your data

You have the right to request access to and correction or deletion of your data from the



contact person, Mrs. Aleid Haenen, as included in YourConnector's Privacy Regulations. To prevent abuse, we may ask you to identify yourself adequately. When it concerns access to personal data linked to a cookie, you must send a copy of the cookie in question. You can find this in the settings of your browser.

Enabling and disabling cookies and removing them

More information about enabling, disabling and deleting cookies can be found in the instructions and/or using the Help function of your browser.