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PROGRESSIO B.V., registered office and place of business at the Stationsstraat 83, 3150 Haacht, Belgium, and registered with the Belgian Chamber of Commerce under number 0820 872 002 (hereafter: “**PROGRESSIO**”) processes personal data of (potential) candidates, clients, visitors (both visitors to our offices and visitors to our Website), suppliers and other relations in order to properly carry out our business activities. In this privacy policy, the term “**Website**” means: www.progressio-fourcentric.com

By means of this privacy policy PROGRESSIO informs you about how we handle your personal data as the party responsible for processing your personal data (the ‘controller’). PROGRESSIO follows the applicable legal rules for the protection of personal data, such as (but not exclusively) the General Data Protection Regulation (GDPR), as well as our own policy as reflected in this privacy policy.

If you have any questions or wish to exercise your statutory rights, please contact us using the contact details at the bottom of this document.

1. Categories of Data Subjects

This privacy policy distinguishes between several types of data subjects. PROGRESSIO may process data of contacts at and/or employees/representatives of (potential) clients, suppliers, public authorities or other relations. PROGRESSIO may also process personal data of visitors to the Website or PROGRESSIO’s office, workers for PROGRESSIO itself or for (potential) clients of PROGRESSIO. PROGRESSIO distinguishes between several different categories of data subjects.

The subcategories are as follows:

- (Contacts at and/or employees/representatives of) clients, suppliers and other relations;
- Visitors of the PROGRESSIO location;
- Visitors of the Website;
- Job applicants of PROGRESSIO;
- (Potential) independent consultants who are not yet contracted by PROGRESSIO;
- Independent consultants who are seconded by PROGRESSIO to be deployed to clients of PROGRESSIO on an interim basis;
- (Potential) candidates who are contracted for a job through PROGRESSIO.

2. What personal data does PROGRESSIO process?

Personal data is information that can be used to identify you, such as your name, address, e-mail address, telephone number and images. In particular, we process the following categories of personal data, for the purposes listed on the next page:

DATA SUBJECTS	DATA	PURPOSE(S)
(Contacts at and/or employees/ representatives of) clients, suppliers and other relations	- First name, surname, title, function (Business) contact details (phone number, (work) e-mail) - Portal login details - Data related to making payments and collecting claims, such as a bank account number and insurance policy details.	- To provide our services, receive services and to govern our contacts with clients and suppliers. - To govern contacts with and obligations towards public authorities. - In the context of accounting activities and litigation management. - Maintaining contact with customers, suppliers and other relations, entering into agreements with customers and suppliers, performing or taking delivery of our services (incl. invoicing). - Sending newsletters or service e-mails.
Visitors to our Website	IP address, browser type and Internet behaviour, such as the time of your visit to our Website, other visit and click behaviour and your username, if any; whether or not through the use of cookies (see more on this below).	To provide, maintain and improve our Website and monitor the performance and use of our Website and improve your browsing experience (including by storing preference settings).
Job applicants of PROGRESSIO	- Identification information: first name, surname, title, function, street & number, zipcode, city, country, date of birth, place of birth and gender. (Business) contact details: phone number and e-mail. - Education, training, field of experience, level of experience, last client/employer worked for, certifications, language(s) and references. - Photo's derived from resumes.	- To initiate an application process. - To assess whether someone is suitable for the position in question. - To contact the job applicant.
Independent consultants who are seconded via PROGRESSIO	- Identification information such as: first name, surname, title, function, street & number, zipcode, city, country, date of birth, place of birth and gender. (Business) contact details: phone number and e-mail. - Education, training, field of experience, level of experience, last client/employer worked for, certifications, language(s) and references. - Bank account information - Photo's derived from resumes	- To contact the independent consultant. - To assess whether someone is suitable for the position in question - To assist our clients with the selection of independent consultant for vacancies. - To enter into a contract with an independent consultant to provide our services to our clients and the performance of that contract.
Candidates who are con-tracted for a job through PROGRESSIO	- Identification information such as: first name, surname, title, function, street & number, zipcode, city, country, date of birth, place of birth and gender. (Business) contact details, such as: phone number and e-mail. - Education, training, field of experience, level of experience, last client/employer worked for, certifications, language(s) and references. - Financial data, such as: current salary, bonuses and allowances. - Photo's derived from resumes.	- To contact a candidate with respect to vacancies with our clients. - To assist our clients with the selection of candidates for vacancies. - To assess whether someone is suitable for the position in question - To gather information about the current salaries for different types of industries.

PROGRESSIO recommends that you do not provide us with any special categories of personal data.

3. How does PROGRESSIO obtain your personal data?

PROGRESSIO may receive your personal data in different ways. You may have provided personal data yourself, for example when you contact us, whether or not via e-mail, telephone or our contact form on the Website. We also collect personal data through cookies (see the information about "Cookies" later in this privacy policy).

Without these personal data we cannot (among other things) conclude and/or execute agreements or respond to your messages. Without cookies, we cannot analyse and optimise the use of our Website and some parts of our Website may not be accessible. Finally, your personal data are also required if you wish to receive our news-letter and have given us your permission for this.

4. On what legal basis and for what purposes does PROGRESSIO process your personal data?

For clients and suppliers, we collect your personal data as (staff member of) a (prospective) client or supplier because it is necessary to enter into a contract and for the performance of that contract and to govern our contracts.

For visitors of the Website, collecting your personal data is based on your consent.

For job applicants for PROGRESSIO, (potential) candidates who are contracted for a job through PROGRESSIO and independent consultants who are (potentially) se-conded via PROGRESSIO, we collect your personal data based on your consent.

Further, may also process your personal data because (i) you have given your con-sent thereto, (ii) we have a legal obligation (for example, tax and accounting regulations) or (iii) we have a legitimate interest that requires us to process your personal data (for example, in case of a dispute).

In case we process your personal data based on your consent, for example when you give us permission to send newsletters to you or when you consent to the use of cookies, you can withdraw your consent at any time. This will have no effect on processing already carried out.

For processing purposes, please also be referred to the table above. PROGRESSIO processes your personal data only to the extent necessary for the purposes set out above or for purposes compatible therewith.

5. Access to your personal data and disclosure to third parties

Employees of PROGRESSIO have access to your personal data only when necessary to perform their duties. In this way (in combination with the security measures to be mentioned below), we aim to ensure that these personal data are only accessible to persons who, because of their position, are authorized to do so. We agree that the personal data may only be used for the purposes specified herein and consider how we can respect your right to privacy as much as possible. Our employees are bound by confidentiality.

Personal data is shared with (for example) our clients for whom we are seeking suit-able candidates. When we share your personal data with others, we make written agreements with them about the processing of your personal data (data processing agreements). Furthermore, we ensure that the third parties are bound by confidentiality and take appropriate security measures to prevent your personal data from simply becoming known to the other parties. In some cases, a legal obligation re-quires us to provide data to third parties, such as the judicial authorities, public authorities, accountants, financial institutions and insurance companies.

In principle, we do not share your personal data outside the UK and European Economic Area (EEA). If we transfer your personal data to countries outside the UK and EEA, we will only do so under the conditions required by privacy legislation (inter alia, we will make effort to ensure that an adequate level of protection exists and will put in place contractual, technical and organisational safeguards where necessary, for example by means of a contract to which the EU Model

Clauses (SCCs) apply and any additional measures where required by law). If we are not assured of an adequate level of protection, we will inform you accordingly and seek your consent to the transfer of your personal data. In doing so, foreign authorities may demand access to your data or you may not be able, or less easily, to appeal to a court. You can withdraw this consent at any time. Your preference will then be adjusted. This has no consequences for the processing that has already taken place.

6. Security of your personal information

PROGRESSIO endeavours to implement appropriate organisational and technical (security) measures to protect your personal data against unlawful access or alteration, disclosure or destruction.

If, despite the security measures, there is a security incident (data breach) that is likely to have adverse effects on your privacy, we will inform you about the incident as soon as possible. We will then also inform you of the measures we have taken to mitigate the consequences and to prevent recurrence in the future. In the unlikely event that you discover a security breach or suspect that the security of your personal data is not properly guaranteed, please contact us immediately.

7. Retention period

PROGRESSIO does not retain personal data for longer than is necessary for the purposes for which we process the personal data, unless we are required to retain your personal data for longer under a statutory provision or on the basis of our overriding legitimate interests (such as an ongoing dispute). **We apply the following retention periods (non-limitative):**

- Personal data of applicants will be deleted no later than four (4) weeks after the end of the application procedure.
- We retain the contact details of (contact persons at/employees of) customers, suppliers and other business relations for a maximum of two (2) years after the end of the agreement/collaboration or two (2) years after the last contact.
- If you have contacted us otherwise, for example via our contact form, we will keep correspondence and personal data contained therein until we have followed up and dealt with your message. The message will not be kept for more than one (1) year after settlement (unless it is, e.g. a complaint).
- We retain financial data for seven (7) years due to tax laws.

8. Your rights concerning the processing of personal data

You have the following rights concerning the processing of your personal data:

- You can request **information about and access to** the personal data that we process about you. This merely means that you can ask what personal data has been recorded about you and for what purposes that personal data is used and with which third parties it is shared.
- You can **object** to the processing of your personal data, for example if you believe that the use of your personal data is not necessary for the execution of our activities or to comply with a legal obligation.
- You can request us to have your personal data **amended/corrected** and/or to **restrict** the processing of your personal data.
- You can ask us to **delete** your personal data from our systems.
- You can ask us to arrange for your personal data to be **transferred** to another party.
- You can **withdraw consent** for the processing of your personal data as given by you at any time. Please note that you do not withdraw your consent for personal data previously processed on the basis of your consent.

Requests and other communications regarding the exercise of the aforementioned rights can be made in writing using the contact details below. If we deem it necessary, we may ask additional questions to verify your identity. We will comply with your request unless we have a compelling legitimate interest not to comply with your request that outweighs your privacy interest. Also, for technical reasons, we cannot (always) immediately delete all copies of personal data from our systems and backup systems. We may also refuse to comply with the aforementioned requests if they are made unreasonably frequently, require unreasonable technical effort or have an unreasonable technical impact on our systems or jeopardise the privacy of others.

If PROGRESSIO has complied with a request to correct, supplement or delete personal data, or if you have withdrawn previously given consent to process your personal data, we will also inform third parties to whom these personal data has been provided of the changes made.

If you are not satisfied with the way we have dealt with your request or objection or otherwise with the processing of your personal data by PROGRESSIO, you can also lodge a complaint about the use of your personal data with the Belgian Data Protection Authority via: [Klacht indienen | Gegevensbeschermingsautoriteit](#).

9. External links and social media

Our Website may contain links to other Websites. We are not responsible for the practices of any third party Websites linked to or from our Website. Our privacy policy does not apply when you use a link to go from our Website to another Website. Your conduct on a third-party Website, including those linked from our Website, is subject to their own rules and policies. We are not responsible for the privacy policies or content of these other Websites. We recommend that you take note of the privacy policies and other relevant (legal) information on the Websites concerned. This information may change regularly.

PROGRESSIO itself makes use of LinkedIn and Lusha to find and connect with (potential) candidates. PROGRESSIO may receive personal data that the candidate provided through LinkedIn. We are not in control of or responsible for the personal information that a candidate provides to LinkedIn, Lusha or other social media platforms. You are bound by the terms and conditions of that social media platform. For questions and concerns regarding your personal information on LinkedIn, Lusha or any other social media platform, please contact that social media platform. This information may change regularly.

10. Automated decision making

PROGRESSIO does not make decisions on matters that could (significantly) affect individuals on the basis of automated processing. There is therefore no question of profiling within the meaning of the GDPR.

11. Cookies

When using our website www.progressio-fourcentric.com, cookies are placed on your device. For more information, see our Cookie Statement [here](#).

12. Contact details

If you wish to exercise your rights or have any questions or complaints about the way PROGRESSIO has handled your personal data, or if you want to report a data breach, please contact:

PROGRESSIO

F.A.O. The management, Stationsstraat 83, 3150 HAACHT, Belgium.

info@progressio-fourcentric.com, or call on +32 16 43 96 69.

13. Modification of this privacy policy

PROGRESSIO may amend or update this privacy policy from time to time. Amendments to this privacy policy will take effect from the moment they are published on our Website. We therefore encourage you to consult this privacy policy regularly, so that you are aware of any changes to this privacy policy. If these adjustments are of significant importance to you, we will inform you accordingly.