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1. INTRODUCTION

Intys is required to process relevant personal and professional data regarding staff, candidates and customers as part of its operational activities and shall take all reasonable steps to do so in accordance with the European General Data Protection Regulation (GDPR) and the Intys Privacy Policy.

Intys recognizes the 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, and repealing Directive 95/46/EC (General Data Protection Regulation) and is actively working towards compliance with that directive. Intys ensures the appropriate actions are taken to comply with GDPR and other relevant legislation.

This Privacy Policy focuses primarily on data collected through the Intys website and personal data of candidates, although other means of gathering data can and will be used, as described later on in this document.

2. DEFINITIONS

Intys NV/SA, with its head office registered in Avenue de Tervueren 270, 1150 Brussels and listed on the Belgian Company register with number 0893.270.030.

Data Subject: an individual who is the subject of the personal data, referred to as 'candidate'.

Customers: all companies, private or government bodies, who entrust Intys with assignments, temporary as well as permanent.

Consent: a legally binding expression of will, given voluntarily, in which the data subject declares his/her agreement to the processing of data.

Processing of data: any action, carried out with or without the assistance of automated processes, that serve to collect, save, organize, store, change, access, use, pass on, transmit, distribute, combine, or reconcile the data.

3. PERSONAL DATA

Personal data covers both personal information and contact details, as well as professional information collected by the candidate's curriculum vitae.

Intys does not store sensitive personal data such as race, medical information, religion, sexual orientation or criminal records. Intys does not store personal data of minors.

Any information which falls under the definition of personal data will remain confidential and will only be disclosed to Intys customers with appropriate consent of the candidate.

4. PRINCIPLES

Intys shall comply with the Data Protection Principles contained in the General Data Protection Regulation to ensure all data is:

- Fairly and lawfully collected
- Fairly and lawfully processed
- Processed for a lawful purpose
- Adequate, relevant and not excessive
- Not kept for longer than necessary
- Processed in accordance with the data subject's rights
- Secured and protected in appropriate ways
- Not transferred to non-business related third parties and not transferred to countries outside the European Economic Area without proper consent from parties involved.

5. DATA COLLECTION AND CONSENT

Intys ensures that data is collected within the boundaries defined by GDPR and within its Privacy Policy. This applies to data that is collected in person (face-to-face or over telephone), electronically (by e-mail) or by submitting through the Intys website.

Intys primarily collects personal data of Candidates through its website, which operates in a secured environment. Consent to collecting and processing the data is given by specifically marking the field to agree with the Intys privacy notice at the CV submission page on which the candidate can attach his/her CV and the data will be transferred to Intys. If no consent is given during the registration at the Intys website, then no data is collected by Intys. Intys ensures it only collects data for which an appropriate and specific consent is given by the candidate.

Personal data of candidates can also be collected via spontaneous or personal contact with Intys staff. In that case, the candidate will be informed of the Intys privacy policy and his/her consent to collect and process the data will be asked before registration at Intys.

Intys may also collect personal data from business partners, as well as disclose personal data to those companies insofar as reasonably necessary for the purposes and on the legal bases set out in the Intys Privacy Policy and compliant with GDPR. Intys and/or those business partners will inform the candidate of this transmission of personal data and his/her consent to collect and process that data will be asked before registration in its databases. This transmission of personal data will most likely be in view of a potential assignment, and is therefore in the advantage of the candidate.

In the case that personal data is transmitted to Intys via third parties, Intys ensures that the data have been collected lawfully in accordance with the relevant legal provisions, and that the use of such data for the intended data processing activities is permitted to a reasonable extent.

Intys only stores personal data of its candidates which is relevant for the Intys professional activities.

Special note to email addresses: Intys uses e-mail addresses of Candidates only for contacting purposes related to assignments, checking availability via periodical update mailings or sending legal documents. Intys does not use the email address for direct marketing purposes, nor does it share these email addresses with direct marketing organizations.

6. PROCESSING OF PERSONAL DATA

Intys processes personal data of candidates solely for the purpose of conducting its professional activities and within the boundaries defined by GDPR and in compliance with the Intys Privacy Policy.

Intys processes personal data of candidates for contacting purposes and for search, selection and matching of a candidate's profile with a potential assignment or mission and/or any other professional activities where in Intys is active. This selection and matching process is executed in a secured database, based on a search engine that works with keywords recognition in attached documents, more specifically in the curriculum vitae of candidates.

7. SHARING OF DATA

The candidate will be made aware in all circumstances, how and with whom their data will be shared through clear communication; during intakes, assignment interviews and/or by means of Intys agreements with the candidate.

Intys may disclose personal data to business partners as described in chapter Data Collection. Intys and/or those business partners will inform the candidate when sharing his/her personal data and his/her consent to collect and process that data will be asked before registration in its databases. Sharing of personal data with our business partners will most likely be in view of a potential assignment, and is therefore in the advantage of the candidate.

8. RIGHTS

Candidates have the right of access to information held by Intys, subject to Data Protection rules. Candidates can ask what data Intys holds about them and why, ask how it is gained, be informed of how it is kept up-to-date and be informed of how Intys is meeting its data protection obligations.

Any Candidate wishing to access their personal data or acquiring more information, should send their request by email addressed to gdpr@intys.eu. Intys will respond to any 'subject access request'

as soon as reasonably practicable and in any event, within 5 working days to provide a reply to an access to information request and within 30 days for access to records.

Intys will provide this information free of charge, by e-mail and in an electronic form (pdf), after verifying the identity of the Candidate.

At any time, Candidates have the right and possibility to update their personal data by emailing an updated CV to Intys or submitting their data via the Intys website. Intys ensures it is updated in its system. The Candidate will be informed that Intys received his/her updated data and will confirm the update by email.

Candidates have, at any time, the right to be forgotten and have their personal data be removed/erased from the Intys databases. A request for deletion should be sent to gdpr@intys.eu. Intys will respond to any 'deletion request' as soon as reasonably practicable and in any event, within 5 working days to provide a reply to the deletion request. The personal data of the candidate will be fully removed from the Intys databases after verification of the candidate's identity and within 30 days after the request was made.

The supply of appropriate evidence of your identity will be required, for example by providing a copy of your passport. The candidate will be informed by e-mail when his/her personal data has been removed.

Intys will keep logs of 'deletion requests' and whose personal data was removed, without further storing any personal data, in order to comply with GDPR and possible GDPR compliancy checks.

Intys may retain data for differing periods of time required for legal purposes or statutory obligations and to the extent permitted by law, even if the candidate requested to have that data removed.

9. DATA ACCURACY

Intys will keep Personal Data of its Candidates as up-to-date and accurate as possible.

Intys and its staff will take every opportunity to ensure data is updated when inaccuracies are discovered. For example, updating contact details if they appear to be invalid or updating availability status if it appears to be outdated. However Intys also encourages Candidates, in their own interest, to notify Intys of any changes in personal- or professional information and availability.

Intys shall not keep personal data for longer than is necessary. Personal data will be retained/stored for a maximum period of 5 years following registration in the Intys databas. With each submission of an updated CV of a candidate via individual contact with an Intys staff member, submission through the Intys website or as reply to an Intys update e-mail, consent to store the personal data for another period of 5 years is given. Intys ensures it will, with each of these actions, inform the candidate of the privacy policy.

Intys guarantees to do its best efforts in data maintenance by regular contact with the candidate and thereby updating a candidate's personal data, and evaluating relevance and accuracy. Intys ensures it will periodically request consent to continue storing personal data of its candidates, and ensures it does not store data older than 5 years, irrelevant data for its professional activities or data which is not collected within the legal boundaries of GDPR and the Intys Privacy Policy.

10. DATA STORAGE AND SECURITY

Intys will take appropriate technical and organizational steps to ensure the security of the Candidate's Personal Data. Data security measures are in place for Personal Data stored in Intys databases and for the processing being performed.

Intys ensures that data stored electronically is protected from unauthorized access, accidental deletion and malicious hacking attempts.

Intys ensures that data processed by external processors (such as but not limited to Inside Web for hosting and maintaining the Intys website) are compliant with this policy and the relevant data protection legislation.

Personal Data of Candidates can only be accessed by authorized Intys staff. Intys staff is aware of the Intys Privacy Policy and their duties that come with it.

11. DATA BREACH NOTIFICATION & ACTION PLAN

Intys must notify supervisory authority of data breaches without undue delay or within 72 hours after discovery, unless the breach is unlikely to be a risk to individuals. If there is a risk towards individuals, then these must be informed as well.

Intys foresees, in compliance to art. 34 GDPR, appropriate procedures to, as quickly as possible, determine a data leak and adequately respond to it.

12. ENFORCEMENT

If a Candidate believes that Intys has not complied to this privacy notice or acted otherwise than in accordance with GDPR, a complaint should be filled via gdpr@intys.eu. Intys will respond to any complaint as soon as reasonably practicable and in any event, within 5 working days to provide a reply to an access to information request and within 30 working days for access to records.

13. COOKIES

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. They serve to help Intys track web traffic, to check if the visitor arrived directly or indirectly to the Intys website, to measure how many times a page has been visited, whether a page has been visited through an advertisement or by other means, to determine a visitor's preferences (location, language).

Cookies are not used to determine the personal identity of anyone who is visiting the Intys website. The information is collected on an anonymous basis via trusted third party suppliers (such as but not limited to Google Analytics).

Cookies can be disabled via an option in the settings of your browser.

14. AMENDMENTS

The Intys Privacy Policy will be updated as necessary to reflect best practices in data management, security and control; and to ensure compliance with any changes or amendments in the GDPR.

Intys will publish updated versions on her website. Candidates are encouraged to check occasionally to ensure they are comfortable with any changes made to the Privacy Policy.

Intys will notify its candidates of changes to this policy by e-mail if required by GDPR.