

# **Privacy Policy**

## **Article 1. General clause**

1.1. This Privacy Policy governs the processing of personal data by CheckHub Sprl, with registered offices at Parvis Sainte-Gudule 5, 1000 Brussels, a company listed in the Belgian Trade and Companies Register under number 0643.862.739 (hereinafter “CheckHub”).

1.2. The purpose of this Privacy Policy is to specify which categories of personal data CheckHub collects through its business activities and its website (www.checkhub.io), subdomains and/or folders, applications, services and any other means relating to information or communication, including emails (hereinafter the “Platform”). It also describes how such data may be processed and disclosed to others. The Privacy Policy further sets out the different measures CheckHub has implemented to safeguard the security and confidentiality of the personal data it collects.

1.3. CheckHub cares about the privacy of the users of its Platform and those whose personal data may be collected (hereafter “User” or “you” or “your”) and will only collect and process personal data in accordance with the provisions of this Privacy Policy.

1.4. CheckHub is to be considered:

(a) as the processor with respect to (i) the personal data it shall receive from the Recruiter relating to the Candidate, (ii) the information and documents uploaded by the Candidate to the Platform. In these cases, the Recruiter shall remain the controller when collecting the personal data and the privacy policy of the latter shall apply.

(b) as the controller of all other personal data it collects as set out hereafter, excluding the personal data as set out under article 1.4 (a).

CheckHub will act in accordance with the provisions of the Belgian Act of 8 December 1992 on the protection of privacy in relation to the processing of personal data (hereinafter: Privacy Act) as modified by the Act of December 11<sup>th</sup> 1998 and the Act of June 13<sup>th</sup> 2005 on the electronic communication or any other legislation that would apply – such as the General Data Protection Regulation - and as further specified in this Privacy Policy.

## **Article 2. Consent – Third party websites**

2.1. If you use this Platform and choose to disclose information on this Platform, you agree with the use of these data in accordance with the present Privacy Policy.

2.2. CheckHub reserves the right to modify this Privacy Policy at all times, without any prior warning in order to comply with the (changing) legal obligations and/or to improve our service towards you. We therefore advise you to consult the Platform on a regular basis.

2.3. Please note that this Platform may contain links to other websites digital platforms or Internet resources which may collect personal data voluntarily or through cookies or other technologies. CheckHub has no responsibility, liability for, or control over those other websites or Internet resources or their collection, use and disclosure of your personal data. CheckHub recommends you to review the privacy policies of those other websites and Internet resources to understand how they collect and use personal data.

## **Article 3. Personal data collected by CheckHub**

3.1 The categories of personal data that may be collected on the Platform, using the services provided by CheckHub or communicating with CheckHub include:

- i. For the Candidates (as defined in the Terms of Use):
  - a. contact data such as name, e-mail address, mobile phone number;
  - b. data of birth, gender, language;
  - c. identity photo, nationality, social security (NISS), residence verification information;
  - d. any document the Recruiter explicitly asks the Candidate to provide in order to facilitate the recruitment process such as driving license, bank cards and any other forms;
  - e. National register number, only to the extent necessary to meet the Recruiter's legal obligations, or in case the Recruiter has received the authorization or is authorized by law.
- ii. For the Recruiters (as defined in the Terms of Use ): names, contact details and functions of the Recruiter's contact persons provided to CheckHub.

3.2 The use of cookies and web beacons by CheckHub is further specified in the Cookie Policy.

3.3 Users can't disclose personal data to CheckHub about another person unless this person has consented to this in accordance with this Privacy Policy.

#### **Article 4. Purpose of the processing**

4.1 CheckHub will process these data for the following purposes:

- a. when it comes to the data of the Candidates:
  - (i) in order to complete, fulfil and process their employment selection process with the Recruiter and disclose the relevant information and documents to the latter;
  - (ii) in order to contact the Candidate to remind him/her on behalf of the Recruiter to provide the information and documents in order to complete, fulfil and process their employment selection process ;
  - (iii) in order to check the accuracy of the information and documents provided, notably through the use of the Optical Character Recognition (OCR) and Document Layout Analysis technologies;
  - (iv) in order to allow any communication between the Candidate and the Recruiter;
- b. when it comes to the personal data of the Recruiters: to enable CheckHub to provide its services under the agreement with the Recruiters.

4.2. CheckHub may also use the personal data provided by the User in order to respond to his/her inquiries, customer service requests and support needs and to fulfil any other request he/she may have.

4.3. CheckHub may also use the personal data provided for the purposes of user administration, market research, enhance the functionalities of CheckHub's services, to provide third parties with statistical information about Users, direct marketing among which the sending of a newsletter, the improvement of the content and the quality of the Platform and services, enhance a better compatibility of the Platform and services to the interests, needs and desires of its Users and accurately tracking, improving and completing the personal data as required by law.

4.3 CheckHub will ensure that for its marketing activities it will comply with the applicable legislation and that it will obtain the necessary authorizations before the User receives any emails or other electronic communication from CheckHub or one of its partners. You can demand at any time to stop the sending of such information.

#### **Article 5. The User's rights**

5.1. Each User has the right to access, modify, correct and delete his or her data. These data can be transmitted to third parties within the limits and conditions as set out under section 6 of this Privacy Policy,

except in case of an opposition hereto. The aforementioned right can be exercised by writing to CheckHub at the following email address hello@checkhub.io accompanied by a copy of the front side of his or her identity card.

5.2. CheckHub takes all reasonable measures to ensure the confidentiality of the personal data which are disclosed by the User. However, each User recognizes that the disclosure of personal data via the internet is not without any risks. The User consequently acknowledges that CheckHub cannot be held accountable or liable for any potential direct and indirect damage he/she would suffer as a consequence of an illegal or illegitimate use of his/her data by third parties who do not have the authorization to use these data.

#### **Article 6. Disclosure of personal data**

6.1. CheckHub will disclose personal data to the Recruiter as set out in Article 4.

6.2. Although CheckHub may transfer personal data to so-called service providers who process data in its name, CheckHub will not share data with third parties for secondary or unrelated purposes unless otherwise stated when collecting these data.

6.3. Where appropriate or required, CheckHub will be entitled to transmit personal data to law enforcement authorities, regulatory or other government agencies, or third parties where necessary or desirable to comply with legal or regulatory obligations or in the context of the above-mentioned purposes.

#### **Article 7. Retention period**

CheckHub does not store the data longer than legally admissible and in any case not longer than required for the purposes mentioned hereafter.

#### **Article 8. International data transfers**

CheckHub will not transfer any personal data to countries which do not have data protection laws equivalent to those in force in the European Economic Area.

#### **Article 9. Security of data**

9.1. CheckHub takes the utmost care to optimally secure personal data against unauthorized use and uses generally accepted and reasonable methods consistent with current technological developments with regard to the operational security to offer protection against loss, abuse, alteration or destruction of all information submitted by Users. If and to the extent that data are provided to third parties, CheckHub agreed with them that they will also ensure that the personal data are optimally secured.

9.2. The User acknowledges that the transmission of data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

#### **Article 10. Agreement as a Data Processor**

10.1. With respect to the activities described in article 1.4 (b), CheckHub confirms having a data processor agreement with its clients in accordance with the General Data Protection Regulation (GDPR) coming into force in May 2018.

#### **Article 11. Amendments to the Privacy Policy**

CheckHub may update this policy from time to time by publishing a new version on the Platform. We recommend that you regularly check the Privacy Policy as those changes are binding upon you.

#### **Article 12. Users' questions**

If you should have any questions about this Privacy Policy or the feeling that your interests are not or inadequately represented, you can address all your questions to CheckHub at the following email address [hello@checkhub.io](mailto:hello@checkhub.io).

**Article 13. Competent Court and Applicable Law**

This Privacy Policy shall be governed by - and construed in accordance with - the Belgian legislation.

The competent courts for disputes regarding this Privacy Policy will be the courts of Brussels, unless otherwise imposed by mandatory statutory provisions.

## Cookie Policy

### Article 1. General information

1.1 This Cookie Policy governs the usage of cookies by CheckHub Sprl, with registered offices at Parvis Sainte-Gudule 5, 1000 Brussels, a company listed in the Belgian Trade and Companies Register under number 0643.862.739 (hereinafter “CheckHub”) through its website <http://www.checkhub.io>, subdomains and/or folders, applications, services and any other means relating to information or communication (hereinafter the “Platform”).

1.2 Cookies are being collected from the Users of this Platform in accordance with the provisions of this Cookie Policy.

### Article 2. How CheckHub uses cookies

#### 2.1. What are cookies?

A cookie is a small piece of data sent from a website and stored in a User’s web browser. When the User browses the same website in the future, the data stored in the cookie can be retrieved by the website to notify the website of the User’s previous activity. It helps the website to remember information about the User’s visit. The Vistor can choose to turn cookies on or off. Cookies do not typically contain any information that personally identifies a User, but personal information that we store about you may be linked to the information stored in and obtained from cookies. Further information on cookies can be found on <http://www.allaboutcookies.org/> or <http://www.aboutcookies.org/>.

#### 2.2. Purposes of the use of cookies

CheckHub uses cookies to remember the preferences of the User on this Platform and to show more relevant services and offers. Cookies are also being used to enable the User to move around the Platform and to provide certain features. Another use of cookies is to secure a safe visit on the Platform. They also help us to optimize a visit to the Platform from the User.

### Article 3. Which information is being collected?

3.1. Cookies may include clicking on particular buttons, logging in or a record of which pages were visited by the User.

3.2. This cookie policy is in accordance with the Belgian law (Belgian Act of 10/07/2012 laying down provisions on electronic communications, *BS 20/9/2012*).

### Article 4. Which types of cookies are being used?

<u>Name</u>	<u>Category of use</u>	<u>Description</u>	<u>Example</u>
Strictly necessary cookies	Security Processes	These cookies are strictly necessary to enable the User to move around the Platform or to provide certain requested features	

Tracking cookies	Preferences	These cookies outlast User sessions. If a persistent cookie has its max-age set to 1 year, then, within that year the initial value set in that cookie will be sent back to the server every time you visit the server. This is used to record a vital piece of information such as how a User initially came to this Platform.	Preferred language: once the User has selected his preferred language the persistent cookie will ensure that once revisiting the Platform the content is delivered in the preferred language of the User.
Performance cookies	Analytics	These cookies help to improve the performance of the Platform, providing a better User experience.	Google Analytics helps CheckHub to analyze how Users use the Platform. It registers the number of Users and tell things about their behavior overall, such as the typical length of a visit or the average number of pages a User views.
	Authentication, Security, and Compliance	Intended to prevent fraud, protect your data from unauthorized parties, and comply with legal requirements	For example, we use Cookies to determine if you are logged in.
Functionality cookies	Notifications	Intended to allow or prevent notices of information or options that we think could improve your use of the Service	For example, we use a Cookie that stops us from showing you the signup notification if you have already seen it.

#### Article 5. Managing cookies in your browser

Some people prefer not to allow cookies. That's why browsers give the ability to manage cookies. Please visit the websites of the different browsers to learn how to block the storage of cookies. It is also possible to delete current installed cookies on your computer.

*Hyperlinks: - Apple Safari, Google Chrome, Internet Explorer, Mozilla Firefox.*

#### Article 6. Changes in the Cookie Policy

CheckHub may update this policy from time to time by publishing a new version on the Platform. It is recommended that User check the Cookie Policy regularly.