

## Privacy statement

This is the Privacy statement of GovernIT B.V., doing business as Cqure. (Cqure, references such as we, our, us). We consider it important to handle personal data with care, and we would like to make this clear to all parties involved. In this statement, we explain how we and our affiliated companies handle your personal data. We process your personal data when you use our websites, including [www.cqure.nl](http://www.cqure.nl). Through our websites you can, for example, contact us by e-mail, request information, or chat with us on WhatsApp.

We may also process your personal data if you use MyCqure or apply for a job with us. My Cqure is an online platform that allows you to sign up for events we organise, or to respond quickly to articles or vacancies. [www.cqure.nl](http://www.cqure.nl) matches up supply and demand, and this makes it a place where professionals and clients can find each other.

### Who is the data controller?

GovernIT B.V., doing business as Cqure (Cqure, we, our, us), located at Prinsengracht 217c, 1015DT in Amsterdam, is the primary data controller for the personal data that are processed via [www.cqure.nl](http://www.cqure.nl). You can reach us by telephone at +31 (0)20 364 2909, or by e-mail at [info@cqure.nl](mailto:info@cqure.nl).

We process personal data together with our affiliated companies. The following companies within our group process personal data for their own purposes and are jointly responsible for this with us:

- GovernIT B.V., doing business as Cqure.
- Vormigitaal B.V.
- Beeldr. B.V.
- CampaignMonitor Pty Ltd.
- Recruiitee B.V.

This Privacy statement covers all the data processing that we and the aforementioned affiliated companies do.

If you are a professional whose personal details have been provided to us by a supplier, this supplier can be regarded as an independent data controller. The supplier then determines the purpose of, and the means involved in, controlling your data, and is your first point of contact when it comes to exercising your rights. The supplier may use their own privacy statement and their own terms and conditions. We recommend that you consult these.

### What personal data do we process?

What personal data we process depends on the services you use and in what capacity you use them.

## Visitors to our websites, and readers of our mailings

1. Information you provide to us. When you visit our websites, you may provide us with personal information, for example by sending us an e-mail with a question or request, or because you use WhatsApp or another chat function that we offer on our websites. We may process your name, your e-mail address or other contact details in this connection. In addition, we process other personal data to the extent that you provide it in your question or request or in the chat.
2. Personal data generated by our websites or e-mails. When you visit our websites, certain information is processed and generated, such as your IP address, information about surfing behaviour, the date and time of your visit, and the way in which you navigate through our websites. If you open a newsletter or a commercial e-mail from us, we can keep track of when you opened it and which parts you clicked on.

## Professionals using MyCqure

1. When you register as a professional on My Cqure, we ask you to fill in at least the following personal data: First and last name, e-mail address, password and, optionally, your phone number, including for your mobile, and the organisation where you work at the moment.
2. Applying  
When you apply from your MyCqure profile, we ask you to complete your application with your telephone number (required), your CV and, optionally, a cover letter. This allows us to reach you easily so we can respond to your application. When you apply for a vacancy, we store the information you fill in during the application or on your CV. We use this information to introduce you to a client or to match you up at some point later with another vacancy. In addition to the personal data you provided us with when you registered, we also process the following personal data: data on your account, such as your profile number, the dates on which it was created, and its status. You can complete your profile with information about your professional background, your CV, your availability, the rate you charge, and the results of any assessments. We also process information about your company, such as your name and business address. And we ask you for information about your identity document, such as the type of document, the country of issue, the document number, and how long it is valid for. For invoicing purposes, we ask for your bank details and your VAT number.

## Clients who use Cqure

Clients can submit their orders via [aanbiedingen@cquire.nl](mailto:aanbiedingen@cquire.nl). We process the personal data of our clients' contact persons. If you are a contact person, this may include your name, information about the organisation where you work, your e-mail address, your phone number (including your mobile number), information about creating a vacancy and its status, and information about any contact you have had with us.

## **For what purposes do we process personal data?**

Our core activity is mediation in the hiring of internal and external staff. MyCqure makes it easy for professionals to respond to, and apply for, vacancies, so that Cqure can help come up with the best match. In this connection, we process your personal data for the following purposes:

### **Record-keeping**

- Registration of the professional and the client
- Creating the MyCqure account
- Account management, and the handling of questions and requests from professionals and clients
- Checking the account, including for completeness

### **The services we offer**

- Making professionals available, and presenting them to clients
- Entering into agreements with professionals or clients for the purpose of an assignment
- Contract management, the financial settlement of contracts, and the calculation of costs and expenses
- Providing services to professionals and clients as agreed
- Helping professionals and clients to comply with administrative requirements and to implement agreements
- Maintaining contact, and answering questions and requests
- Providing additional services, and improving our service offering
- Providing information about the services Cqure and its partners offer, and about relevant developments in the market.

### **Compliance and security**

- Internal controls and security: to prevent, detect and investigate potential breaches of our security
- Complying with laws and regulations, and detecting, preventing and combating fraud and other illegal activities
- Handling of claims and complaints
- Complying with legal rulings and orders, responding to requests from government authorities
- Complying with tax obligations incumbent upon us or our clients, and limiting liability
- Enforcing our terms of use and contractual agreements
- Protecting our activities, rights, privacy, security and property

## What is the basis for processing personal data?

We process personal data only if there is a legal basis for doing so.

- Implementing the agreement: We conclude agreements with professionals and clients, and on that basis we process personal data. These agreements relate to the services we offer. It is also conceivable that we will request personal data from you prior to the conclusion of an agreement, so that we can draw it up.
- Consent: In certain cases, we may ask for your consent before we process your data. For example, we ask your permission before we send you certain news items.
- Legal obligation: In some cases, we are obliged to process certain personal data. This obligation may also mean that we are obliged to share certain personal data with clients or other third parties for further processing.
- Legitimate interest: We may process personal data because we have a legitimate interest in doing so, or because the organisation to which we provide your personal data has a legitimate interest in receiving it. This is the case, for example, when we want to avoid tax liability or limit the risk of such liability, or when we want to detect and prevent fraud.

## Profiling

If you are a professional, we can analyse and profile the personal data that you provide and that we can access because it is publicly available. In this way we can more effectively map out which assignments and which clients are best suited to your knowledge and experience. Based on these profiles, no decisions that might significantly affect you as a professional will be made automatically. Cqure will work with you at all times and will never send your information to third parties without your permission.

## Direct marketing

We offer you the opportunity to sign up for our newsletters and other direct-marketing messages we produce.

You can easily unsubscribe from the messages we send you at any time by using the link in the emails we send.

## Cookies

We use cookies and similar techniques on our [www.cqure.nl](http://www.cqure.nl) website. Because we want to safeguard your privacy and make Cqure even more user-friendly, we think it is important for you to know how and why we use cookies. Please read our Cookie policy for more information on how we use cookies.

## Who has access to your personal data?

Our employees have access to your personal data on a need-to-know basis. This also means that employees of the companies affiliated with us may have access to your personal data to the extent necessary to provide our services.

In certain cases, we may share personal data with third parties. We will do this only when it is necessary for our services and to fulfil the objectives set out in this Privacy statement.

- We may share the personal data of professionals with our clients. In addition, we may share personal data with other parties with whom we, or the client(s), work, such as financial-service providers.
- We use service providers, to send e-mails and to host our site, for example. To the extent that these service providers, as processors of data, process personal data on our behalf, we set out arrangements in a data-processing agreement.
- Only if, and to the extent that, we are legally obliged to do so, do we share personal data with regulators, tax authorities and law enforcement agencies.

## Are your personal details secure?

We have taken appropriate technical and organisational security measures to protect the personal data we process against loss or unlawful use. In this way, we secure our systems and applications in accordance with the applicable information-security standards. We have also made agreements with our service providers and required them to take adequate security measures.

## Will your personal data be processed outside the EEA?

In principle, we process your personal data within the European Economic Area (EEA). We use servers located in Europe, and the companies in our group are located within the EEA. Because we may use processors whose head offices are outside the EEA, it is conceivable that we will share your personal data directly or indirectly with organisations outside the EEA. If this is the case, we will take appropriate measures to make sure that such processing is justified. For example, all our processors who have servers outside the EEA have included in their processing agreement that they will work in accordance with the GDPR guidelines.

## How long will we keep your personal data for?

We will keep personal data only for as long as this is necessary for the purposes indicated in this Privacy statement. This means that we will in any case process personal data as long as you are registered with us and/or have an agreement with us.

## Requests for access, corrections, and deletion

Everyone whose data we keep may, as provided for by law, exercise certain rights with regard to their personal data. For example, you have the right to access, rectify and delete personal data pertaining to you. You can also object to the use of your personal

data, or ask for that use to be restricted. You can exercise these rights by using the contact details provided in this Privacy statement to contact us. In doing so, please specify clear the data-processing operations involved. We will then let you know as soon as possible what information we have on you, so that you can decide whether you want to change it or have it removed. You can delete your Cqure profile yourself by logging in.

## **Complaints**

If you have any complaints about how we handle your personal data, you can reach us by phone at +31 (0)20 364 2909 or by e-mail at [info@cqure.nl](mailto:info@cqure.nl). We will be happy to help you find a solution.

## **Modifications**

Developments can take place quickly, so something can also change in the personal data that we ask you to provide and that we then process further. Regulations can also change. We therefore amend our Privacy statement from time to time, and we recommend that you consult it regularly.

**Update: August 2019**