




**wortell**



# **Privacy statement**

**Website**

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**We empower People.**

# Content

<b>1</b>	<b><i>Privacy statement</i></b>	<b>3</b>
<b>2</b>	<b><i>Contact details</i></b>	<b>4</b>
2.1	Data Controller	4
2.2	Privacy officer	4
2.3	Dutch Data Protection Authority (DPA)	4
<b>3</b>	<b><i>Collection and processing of personal data</i></b>	<b>5</b>
3.1	Collection of personal data	5
3.2	Categories	5
<b>4</b>	<b><i>Sharing information with third parties</i></b>	<b>8</b>
4.1	Sub-processor	8
4.2	Security	8
4.3	Automated decision-making	8
4.4	Transfer outside the EEA or international organisation	8
<b>5</b>	<b><i>Rights of data subjects</i></b>	<b>9</b>
5.1	Explanation of data subjects' rights	9
5.2	Request	9
<b>6</b>	<b><i>Complaints</i></b>	<b>10</b>
<b>7</b>	<b><i>Changes to the privacy statement</i></b>	<b>11</b>
<b>A</b>	<b><i>Annex: Cookies</i></b>	<b>12</b>

# 1 Privacy statement

This is Wortell's privacy statement. In this document, we explain what personal data we collect and process when you interact with us through any of the interactions described in this statement. It also describes how long we keep the data, in which cases we share the personal data with third parties, which parties these are and what your rights are.

We think it is important to be transparent about this and to make sure you are well informed about it. We recommend that you read this statement carefully and check it regularly for changes.

## 2 Contact details

### 2.1 Data Controller

This privacy statement applies to all data processing operations by Wortell Group B.V. or any underlying entities.

#### Netherlands

Wortell Group B.V.

Schipholweg 671

1175 KP Lijnden

Registration number: 73419540

Website: <https://www.wortell.nl>

#### Belgium

Wortell Belgium N.V.

Sluisweg 1

9000 Ghent

Registration number: 0879683397

Website: <https://www.wortell.be/>

### 2.2 Privacy officer

We have a Privacy Officer, who is responsible for monitoring and answering questions related to this privacy statement. If you have any questions about this privacy notice, or requests to exercise your legal rights, please contact the PO using the details provided below:

#### Contact details

E-mail: [privacy@wortell.nl](mailto:privacy@wortell.nl)

### 2.3 Data Protection Authority (DPA)

The regulator monitors compliance with the legal rules on personal data protection. You can contact them using the contact details below:

#### **Netherlands**

Dutch Data Protection Authority (DPA)

PO Box 93374

2509 AJ The Hague

Telephone: +31 88 180 52 50

[www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl)

#### **Belgium**

Data protection authority

Rue du Printing Press 35, 1000 Brussels

+32 (0)2 274 48 00

[www.gegevensbeschermingsautoriteit.be](http://www.gegevensbeschermingsautoriteit.be)

## 3 Collection and processing of personal data

### 3.1 Collection of personal data

Wortell collects and processes personal data to provide you with the best experience. When we collect and use your personal data, it is usually because you have provided it to us. Sometimes we do not receive your data directly from you, but from another party. For example, because you have given that other party permission to share data with us. We may also obtain information from public sources.

### 3.2 Categories

The personal data we process depends on your interaction with Wortell. In this chapter, we describe the different categories of data subjects and the corresponding interaction from whom we collect and process personal data.

#### Visitor of the website

When you visit our website, information is collected by cookies used on our website. Our website uses cookies to distinguish you from other users of the website. This allows us to provide you with a good browsing experience and also enables us to improve the way our website works. Please see our Appendix A for detailed information about the cookies we use and their purposes.

In addition, our website allows you to use our chat function to contact us with questions about our services or about our vacancies.

For this purpose, we process the following personal data:

- First name and surname
- Phone number
- Email address
- Company name
- Job title

We use this information to handle your contact request in the best possible way. We keep this information until we think you are satisfied with our response.

Furthermore, you can use one of our forms on our website to sign up for events, sweepstakes and other promotions, for example.

For this purpose, we process the same personal data as mentioned above. We use this data to your request. If you use the chat option or one of our forms, we may store your data to keep you informed about news and important developments relating to your interests, for example. You always have the option to withdraw your consent.

## Recipient of Newsletter and/or Marketing messages:

Through our website, you can subscribe to our newsletter and marketing messages. In this newsletter, we will inform you monthly by e-mail about information, news and developments in the field of your interests.

To this end, we process the following personal data:

- First name and surname
- Email address

We use this data based on your consent. You can unsubscribe from the newsletter at any time. Every newsletter contains an unsubscribe link. The moment you unsubscribe, we keep your data on our blocking list, so you will not receive any more mailings from us.

## Applicant:

Have you responded to one of our vacancies or submitted an open application? If so, we process your personal data in order to process your application. We process the following personal data for this purpose:

- Name,
- Address
- E-mail address
- Phone number
- Other information usually included on a CV.

We keep this data for a maximum of 2 months after the application process is completed. If applicants give their consent, we may store applicants' personal data in our talent pool. You can unsubscribe from the *talent pool* at any time. We keep your data for the period you are part of our *talent pool*.

## Artificial Intelligence in Recruitment

We use artificial intelligence (AI) to support the recruitment process. Only the documents and interview data you provide (such as your CV, cover letter, and any audio recordings) are analyzed to identify relevant competencies and skills. For this purpose, we use:

- Carv from Carv.com
- In2Dialog from In2Dialog BV
- N8N

Processing is based on our legitimate interest in making the selection process more objective and efficient. You have the right to object to this processing. No automated decision-making takes place without human intervention. All data is processed within the European Union and in compliance with the EU AI Act.

## Assessment

For certain positions, we may ask candidates to take an assessment as part of the application process. We use the personal data processed in the context of this assessment solely to assess the candidate's suitability for the position in question. This processing is based on our legitimate interest in being able to carefully select candidates. We use

TestGorilla to conduct assessments, which processes your personal data on our behalf as a processor. A processor agreement has been concluded with TestGorilla.

### *Screening and Certificate of Conduct (VOG)*

For all positions, screening is part of the onboarding procedure. This will include requesting a Certificate of Conduct (VOG) or the Belgian Extract from the Criminal Record. This processing is based on a legitimate interest, namely ensuring integrity, reliability, and safety within our organization and for our clients. Candidates are informed in advance about the nature and purpose of the screening. The data is used exclusively for screening purposes, retained no longer than necessary, and adequately secured against unauthorized access or use

## **Customer**

As an organisation, you can use our services. Depending on the service you purchase, personal data will be processed. This is detailed in our [Processing Register for each Subprocessor](#).

We use this data to execute the agreement we have entered into and to maintain the resulting relationships. We keep this data for the duration of the agreement. We keep some data for longer if we are obliged to do so (e.g. because of the tax retention period of seven years).

## **Potential customer**

For marketing and sales purposes, we collect personal data from potential customers. This is done through multiple channels including lead generation through our website and external call centres. For this purpose, we process the following data:

- First name and surname
- Phone number
- Email address
- Company name
- Job title

We collect this data to:

- Send relevant information about our products and services;
- Approach and advise potential customers appropriately;
- Optimise our marketing campaigns;
- Understanding the needs and interests of our target audiences.

We retain personal data of potential customers for as long as it is relevant to our marketing and sales activities. This means that we retain data for as long as there is potential interest in our services, or until the data subject indicates that they no longer wish to be contacted. We periodically assess whether data is still current and relevant. If it is not, the data will be deleted or anonymised. Personal data is kept for a maximum of one year after the last contact moment.

## **4 Sharing information with third parties**

### **4.1 Sub-processor**

We may share your personal data with different parties if this is necessary for the purpose. We have entered into a processor agreement with these sub-processors to ensure appropriate security and confidentiality of your data. Wortell remains responsible for this processing.

Many of these sub processors also use Wortell itself as a processor in its own operations, Wortell therefore has processor agreements with these parties in addition to sub processor agreements. We have included these sub processors and what information is shared with them in our processing register for each sub processor.

### **4.2 Security**

Wortell takes technical and organisational measures to secure the personal data we process. Our information security policy is set up in accordance with international standards. If you have any questions about how Wortell secures information, please contact us.

### **4.3 Automated decision-making**

Wortell does not use automated decision-making based on your personal data.

### **4.4 Transfer outside the EEA or international organisation**

Wortell does not process personal data outside the European Economic Area (EEA). If sub-processors are or will be engaged that are based outside the EEA, Wortell will ensure that this is done under strict conditions that guarantee at least the same level of protection as the GDPR. Questions about where any processing takes place should be sent to [privacy@wortell.nl](mailto:privacy@wortell.nl)



## 5 Rights of data subjects

Under the General Data Protection Regulation, data subjects whose personal data is processed have various rights to control it. Below, we want to make it clear to you what your rights are.

### 5.1 Explanation of data subjects' rights

#### **Right of access:**

You have the right to receive a copy of the data processed about you.

#### **Right to be forgotten:**

You can request deletion of the data we process about you.

#### **Right of rectification**

You have the right to have your data changed if it is incorrect or incomplete.

#### **Right to data portability:**

The GDPR gives you the right to receive a copy of your personal data in a commonly used digital format so that you can transfer it to another party.

#### **Right to withdraw consent:**

If personal data was obtained on the basis of your consent, you can also withdraw this consent, without affecting the lawfulness of the processing based on your consent before it was withdrawn.

#### **Right to object:**

You always have the right to object to Wortell's data processing involving you. You can object by sending an e-mail with your objection and substantiation to [privacy@wortell.nl](mailto:privacy@wortell.nl).

### 5.2 Request

You can request to exercise your privacy rights by emailing your request to [privacy@wortell.nl](mailto:privacy@wortell.nl). To make sure you who you say you , we will contact you to verify your identity.

We will respond to your request as soon as possible, but no later than four weeks. We will not charge a fee for these requests. If you frequently make repeated requests to us to exercise your rights, we may refuse your request or charge a reasonable administration fee for doing so, which we will always do only after we have disclosed these fees to you.

## 6 Complaints

We prefer you to turn to us first if you have concerns about your privacy. That way, we can try to resolve any issues. To do so, please contact us at [privacy@wortell.nl](mailto:privacy@wortell.nl)

We would also like to inform you that you have the option of submitting a complaint to the regulator, the Personal Data Authority. A complaint can be submitted via the contact details mentioned in article 2.3 of this statement.

## **7 Changes to the privacy statement**

We may change, amend, add or remove (parts of) this privacy statement at any time, and all changes take effect immediately. Our website always shows the version in force. The date of the latest amendments is mentioned in this document.

## A Annex: Cookies

When you view our website, we may store certain information on your computer. This information exists in the form of a small text file, also known as a "cookie". Analytical and functional cookies help us in many ways to make your visit to our website more enjoyable and meaningful. These cookies allow us to collect general and non-personal information about you. Cookies also make it possible to tailor our website to your interests and preferences. They do not contain personal information such as your name or e-mail address. You can withdraw your consent to cookies by deleting cookies via your browser settings.

### Necessary

Necessary cookies help make our website usable by providing basic features such as Enable page navigation and access to secure areas of the website.

Name	Provider	Expiry date
Wortell_session	www.wortell.nl	2 hours
XSRF TOKEN	www.wortell.nl	2 hours
Permission_status	www.wortell.nl	1 year

### Statistics

Static cookies help us understand how visitors use our website. We collect analytical data anonymously.

Name	Provider	Expiry date
Go to	Google Analytics	2 years
_gid	Google Analytics	1 day
_gat_UA-*	Google Analytics	Session

### Marketing

We use marketing cookies to make our forms work properly and to Recognise which other forms you have used.

Name	Provider	Expiry date
__hssc	Hubspot	30 minutes
__hssrc	Hubspot	Session
__hstc	Hubspot	13 months
Hubspotutk	Hubspot	13 months
_fbp	Facebook	3 months