

**Cartamundi  
Website Privacy Policy**

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## 1. Introduction

Cartamundi Services NV with registered office at Turnovatoren 14/1, 2300 Turnhout, Belgium and registered under the number 0877.568.403 in the Crossroads Bank for Enterprises (hereinafter, “**we**” or “**us**”) values your privacy and is committed to protecting your personal data in accordance with applicable privacy laws, including the General Data Protection Regulation (“**GDPR**”).

This privacy policy applies to the personal data processed via all services and websites offered by Cartamundi Services NV (the “**Privacy Policy**”). We refer to these services and the website as the “**Services**”. Personal data is data that can be used to identify an individual person directly or indirectly.

The Cartamundi group includes different legal entities both in the European Economic Area (EEA) and outside the EEA. Cartamundi Services NV is the Belgian headquarters of the Cartamundi group and performs certain centralised services for the local entities, such as recruitment support services consisting of posting vacancies, collecting and transmitting CV’s, as well as whistleblowing support services consisting of transmitting Speak Up! reports to the relevant local legal entity. Cartamundi Services NV is also your point of contact for any questions you may have regarding the processing of your personal data by the Cartamundi group.

For transparency reasons we have separated our Privacy policies in accordance with the website you are visiting.

If you have any further questions regarding our use of your personal data, feel free to contact us: [privacy@cartamundi.com](mailto:privacy@cartamundi.com).

## 2. What personal data do we collect?

### 2.1 Who are “you”?

We refer to “you” a lot in this Privacy Policy. To better understand what information is most relevant to you, see the following useful definitions:

- **Visitor:** you are visiting the website because you are curious, have a particular question, or you have heard about us from our marketing and sales channels.
- **Applicant:** you are visiting our website with the intention to apply for one of our job vacancies and/or are in the selection process for a specific job.
- **Speak Up!:** you are visiting our website because you want to report misconduct, unethical behaviour, illegal practices or other compliance issues you came across in your interaction with us, via our Speak Up! page.

### 2.2 Personal data we collect from you and how

When you visit our website, regardless of whether you are a Visitor or an Applicant, we may collect the following personal data from you:

- **Cookies and other trackers:** We provide more information on the processing of your personal data through cookies in section 6 of our [Cookie Policy](#).

As a **Visitor**, if you use the support available on the website, by submitting a request through our contact forms, we may collect and process the following personal data that we received from you:

- **Contact Information:** such as your first name, last name, email address, active industry, country and other information you provide to us.
- **Optional information:** you can also provide us the Company you work for.
- **Communication and contact history:** E.g. reason for contact, communication made.

If you are an **Applicant**, we may collect and process the following personal data that we received from you:

- **Contact details:** When you apply for a vacancy, we collect certain information from you, such as your first name, last name, form of address, address, e-mail address and phone number.

- **Additional information:** We also ask for your language knowledge, your CV and, if applicable, cover letter, how you found our vacancy and, if applicable, a colleague that referred you.
- **Log-in details:** In order to let you log-in to the platform we use, we will also process your log-in details such as username and password.

When you submit a report via the **Speak Up! form**, your report will be received by Cartamundi Services NV and transmitted to the relevant local entity, who will investigate your report in accordance with applicable group and local policies. Below you can find information regarding the receipt and transmission of your report by Cartamundi Services NV.

- **Contact Information:** such as your first name, last name, email address (depending on whether you want to remain anonymous or not), capacity in relation with Cartamundi, country and other information you provide to us.
- **Information relevant to the matter you report:** type of concern you report, description of the background and history, location, dates, sequence of events and description of circumstances, identity and function of involved individuals.
- **Optional information:** any further information regarding the matter you report that you decide to provide to us, which may include any information contained in documents uploaded by the reporter and/or, special categories of personal data and data of a potential criminal nature.
- **Communication and contact history:** copy and date of the report you submit.

### 3. How do we process your personal data and why?

We process your personal data for the following purposes and based on the legal basis mentioned with each purpose:

#### 3.1 When visiting our website

Purpose	Type of personal data	Processing ground	Retention period
Answering your query when you contact us, including when this is done via our contact form on our website.	<ul style="list-style-type: none"> <li>- <b>Contact details</b></li> <li>- <b>Communication and contact history</b></li> </ul>	Legitimate interest  Necessity for the formation of a contract, when relevant	Up to 1 year after moment of contact.

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Sending you marketing communications such as promotions, news and updates.	<b>- Contact details</b>	Consent	1 year after receiving the consent.
Ensuring the possibility of exercising or defending our interests in court, and actually proceeding to do so, if we believe that our interests are being harmed and legal action is imminent (e.g. judicial recovery of an unpaid invoice), or if legal action were to be taken against us by a person who feels aggrieved by us (e.g. for defending a dispute). Countering fraud and other forms of abuse of our services.	All personal data mentioned in this Privacy Policy, to the extent relevant in function of the relevant (impending) dispute.	Legitimate interest	10 years

### 3.2 When applying for a vacancy

We may collect and process additional personal data for the following purposes and based on the following legal grounds:

Purpose	Type of personal data	Processing ground	Retention period
Registering an account on the platform of CVWarehouse.	<ul style="list-style-type: none"> <li>- <b>Log-in details</b> e.g. username and password</li> <li>- <b>Contact details</b> e.g., name, e-mail address.</li> </ul>	Consent	In accordance with the privacy policy of the platform: <a href="#">CV Warehouse Candidate Portal   Privacy</a>
Applying for a vacancy of Cartamundi	<ul style="list-style-type: none"> <li>- <b>Contact details</b> e.g., name, e-mail</li> <li>- <b>Additional information</b></li> </ul>	Legitimate interest	12 months after you applied for the vacancy.

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<p>Sending communications regarding the application process after applying for a vacancy.</p>	<ul style="list-style-type: none"> <li>- <b>Contact details</b> e.g., name, e-mail</li> <li>- <b>Additional information</b></li> <li>- Other information provided by you through the communications.</li> </ul>	<p>Consent</p>	<p>12 months after you applied for the vacancy.</p>
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### 3.3 When submitting a report via our Speak Up! form

We may collect and process your personal data for the following purposes and based on the following legal grounds:

Purpose	Type of personal data	Processing ground	Retention period
<p>Receiving a report that you submit via our Speak Up! form and forwarding it to the relevant authorised impartial representatives</p>	<ul style="list-style-type: none"> <li>- <b>Contact Information</b></li> <li>- <b>Information relevant to the matter you report</b></li> <li>- <b>Optional information</b></li> <li>- <b>Communication and contact history</b></li> </ul>	<p>Necessity to comply with our legal obligations under the applicable whistleblower protection legislation</p> <p>Our legitimate interests where there is no such legal obligation or if the reported concern falls outside of the material scope of the applicable whistleblower protection legislation</p> <p>When the report contains sensitive information, these will be either processed to comply</p>	<ul style="list-style-type: none"> <li>- Speak Up! form: 1 day</li> <li>- Information collected via the Speak up! form: until the reported violation has been remedied according to the applicable statute of limitation in the relevant country. Information that is not necessary or relevant to the reported matter will be immediately deleted or anonymised.</li> </ul>

		<p>with legal obligations under the applicable whistleblower protection legislation or other applicable laws, or because it is necessary to establish, exercise or defend legal claims.</p>	
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*Note: the processing of personal data in connection with the actual handling of a whistleblowing case is subject to the relevant Cartamundi entity’s privacy policy and is not covered under this Privacy Policy.*

#### **4. Do we share personal data with third parties?**

We only use the personal data we receive for the purposes described above. In that regard, we may need to share your personal data with third parties, so-called ‘recipients’:

##### 4.1.1. Internal transfers within our group

Cartamundi Services NV is a part of a corporate group under which various companies and commercial activities are housed. We may share your personal data within our group for administrative and infrastructure-related reasons, for commercial reasons such as ensuring optimal service, as well as in connection with the provision of centralised support services for other entities of the Cartamundi group such as recruitment, whistleblowing, point of contact for privacy related matters.

##### 4.1.2. External service providers

We may use external service providers to provide or perform services and functions on our behalf. We may make personal data available to them solely to perform these services and functions. We have taken the necessary technical and organizational measures to ensure compliance with data protection provisions and also require external service providers to do so.

We may transfer personal data to the following categories of recipients, with these third parties acting as our processors in certain cases:

- Processors who assist us technically or IT-wise in the operation of our businesses, for the purpose of secure and efficient digital data management within our businesses and optimal service provision, such as software service providers, hosting service providers;
- Organisations with whom we enter into a business transaction that results in the inclusion of additional entities in our group (e.g. as part of a merger), or that results in the transfer of certain of our entities or business assets;

- Practitioners of regulated professions such as accountants and lawyers, or other independent external advisers, for the purpose of complying with our legal obligations and defending our interests, as required.

#### 4.1.3. Authorities and justice system

We may also make personal data concerning individuals available to public or judicial authorities, law enforcement personnel and agencies as required by law, including to meet national security or law enforcement requirements, and including to agencies and courts in the countries where we operate. Where permitted by law, we may also disclose such information to third parties (including legal counsel) when necessary for the establishment, exercise or defense of legal claims or to otherwise enforce our rights, protect our property or the rights, property or safety of others, or as needed to support external audit, compliance and corporate governance functions;

#### 4.1.4. Potential acquirers

In the event of a sale, merger, liquidation, dissolution, or other, certain personal data may be disclosed to the party (and/or its legal counsels) acquiring all or part of the equity or assets of Cartamundi Services NV or its business operations. If this proves to be necessary, we will take the necessary precautions (e.g. need-to-know-basis only, enter into confidentiality agreements and apply other industry best practices) to protect your privacy at all times.

## **5. Do we share personal data outside of the European Economic Area?**

The European Economic Area ("EEA") includes the countries of the European Union, Norway, Liechtenstein and Iceland. The GDPR requires additional safeguards if your personal data is transferred to entities in countries outside the EEA (such as the conclusion of agreements based on the European Commission's Model Clauses). As a corporate group, we have our headquarters in Belgium and we also aim to keep your data on servers and in data centers within the EEA as much as possible.

Regarding international transfers of personal data and processing outside the European Economic Area (EEA), your data are only transferred to other entities of the Cartamundi Group or service providers of other entities of the Cartamundi Group located in third countries outside the European Economic Area. We avoid transferring your data to a third country whenever possible. Cartamundi Services NV will ensure that if personal data is transferred to a recipient in a country not covered by a European Commission decision to provide an adequate level of protection, it will be subject to the provisions of a data transfer agreement, which will include (a) the standard contractual clauses issued by the European Commission, or (b) any other mechanism in accordance with the privacy legislation, or any other regulation relating to the processing of personal data.

Regarding international transfers of personal data and processing to the United States, your data are only transferred to other entities of Cartamundi Group or service providers of other entities of Cartamundi Group in accordance with the EU-US Data Privacy Framework. We avoid transferring your data to a third country whenever possible.



The following transfer are identified by Cartamundi Services NV:

<u>Which partner?</u>	<u>Country outside EEA</u>	<u>Statutory transmission system</u>
Google Analytics – the specific information on the specific data collection by the use of cookies from Google Analytics can be found under section 9 of our <a href="#">Cookie Policy</a>	USA	EU-US Data Privacy Framework
Meta - the specific information on the specific data collection by the use of cookies from Google Analytics can be found under section 9 of our <a href="#">Cookie Policy</a>	USA	EU-US Data Privacy Framework
Twitter - the specific information on the specific data collection by the use of cookies from Google Analytics can be found under section 9 of our <a href="#">Cookie Policy</a>	USA	EU-US Data Privacy Framework
SAP	USA	EU-US Data Privacy Framework

## 6. How long do we retain personal data?

We may retain your personal data no longer than necessary for the purposes for which they were collected or as required by applicable law. The specific retention periods are listed in section 3.

We also describe the expiry periods for cookies on our websites in our Cookie Policy.

## 7. Security?

We apply appropriate technical, physical and organizational measures that are reasonably designed to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, and against other unlawful forms of processing. Access to personal data is restricted to authorized recipients on a need-to-know basis. We maintain a comprehensive information security program that is proportionate to the risks associated with the processing. The program is continuously adapted to mitigate operational risks and to protect personal information, taking into account industry-accepted practices.

## 8. What are your rights?

You may wish to exercise a right to obtain information about yourself or to correct, update or delete that information. Some of these rights may be subject to some exceptions or limitations in local law.

We will take reasonable steps to verify your identity and we will respond to your request to exercise these rights within a reasonable time (and in all cases within one month of receiving a request) subject to the below.

- You always have a **right of access** your personal data. This allows you to check what personal data we process about you and to get a copy of it to the extent this does not adversely affect the rights and freedoms of others;
- You always have a **right to rectify** your personal data. This allows you to correct or complete incorrect or incomplete personal data that we process about you;
- You have a **right to erasure** of your personal data. This allows you to permanently delete personal data that we process about you. We are not always obliged to delete your personal data at your request – this right only applies in the cases and to the extent provided for by law;
- You have a **right to restrict** the processing of personal data relating to you. This allows you to freeze the use of your personal data by us, without deleting it. We are not always obliged to restrict your personal data at your request – this right only applies in the cases and to the extent provided for by law;
- You have the **right to object** to the processing of your personal data carried out on the basis of our legitimate interests. This allows you to oppose the further processing of your personal data. We are not always obliged to honour your objection, except if we process your data for marketing purposes;
- You have the **right to withdraw** your consent at any time where the processing of your personal data is carried out on the basis of your consent;
- You have the **right to data portability**. This allows you to transfer, copy or forward personal data easily from one data controller to another. This right can only be exercised if the processing is based on your consent or on an agreement we have with you.

If you believe we have not handled your request appropriately, you may always lodge a complaint with a competent supervisory authority in Belgium:

Belgian Data Protection Authority (“Gegevensbeschermingsautoriteit”)  
Drukpersstraat 35, 1000 Brussels  
+32 (0)2 274 48 00 +32 (0)2 274 48 35 [contact@apd-gba.be](mailto:contact@apd-gba.be)  
<https://www.gegevensbeschermingsautoriteit.be/burger/acties/klacht-indienen>.

If you wish to exercise any of the rights mentioned above, please send your request to [privacy@cartamundi.com](mailto:privacy@cartamundi.com).

## **9. Changes to this Privacy Policy**

We may update this Privacy Policy from time to time. In circumstances where a change will materially change the way in which we collect or use your personal data, we will send a notice of this change to all of our customers.

This privacy policy was last amended in May 2024.

## **10. Do you have any questions or a complaint?**

If you have any comments, questions or complaints, please do not hesitate to contact us on [privacy@cartamundi.com](mailto:privacy@cartamundi.com).