

Privacy Statement CapCloud

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Introduction

CapCloud Academy Solutions B.V. (hereinafter referred to as: "CapCloud") maintains an online Platform to support Human Resources related processes of its Clients, like learning and development, competence management, search and recruitment and employability in general.

It is inherent to the purpose of the Platform that personal data are processed. These personal data are processed solely for the purposes as determined by CapCloud's Clients, who remain responsible for those data.

Apart from these Platform-related personal data, CapCloud is independently responsible for some commercial personal data and data of its own personnel.

CapCloud is committed to process all data in accordance with the Dutch and EU privacy law, and to ensure a high level of information security.

In this Privacy Statement it is explained what data we process and why, what we do with personal data, how we manage information security and how you can exercise your rights.

CapCloud can be reached with the contact details at the top of this Privacy Statement. Our **Data Protection Officer** is registered with the Dutch Data Protection Authorities and can be reached directly via email dpo@capcloud.academy or by phone +31 881 702009.



Which data do we process and why?

Processing for our Clients

It is inherent to the purpose of the Platform that personal data are being processed. CapCloud's Clients determine the nature, purpose and justification of personal data processing and remain responsible for the data. Personal data being processed through the Platform can be separated into two categories:

1. HR-related content on the Platform, i.e. all data related to an individual's education and training, qualification, competence, performance, personality, experience and employability in a broad sense. Which specific data are being processed is determined by CapCloud's Clients.

Clients may also decide to collect and process special categories of personal data (e.g. religion / beliefs, race, political affinity, health, sexual orientation, membership of a trade union, criminal personal data). Collection of special categories of personal data shall never be enforced by CapCloud.

2. Technical personal data related to the usage of the platform, which are used for troubleshooting and optimising the platform (IP addresses, used web browsers and Operating Systems, and usage logs).

Processing for CapCloud

CapCloud also collects and processes personal data for its own purpose. These include commercial personal data for exercising contracts and gaining new business, and personal data of its own personnel required to exercise their labour relations with CapCloud.

Commercial personal data are limited to name and contact details.

Personnel data include name, contact details, bank account and fiscal numbers, identity papers, certificates of conduct, and information around training and education. As and if required for the work, medical certificates may be collected as well (special category of personal data). Job applicants may be requested to provide their resume and answer some specific job-related questions.

What do we do with your data?

The majority of data are processed solely upon request of CapCloud's Clients, as determined by these Clients. The Client remains responsible for the data and determines how the data are used and treated, and for how long (retention). CapCloud shall neither use any of these data for its own benefit, nor disclose them to third parties.

It is, however, inherent to the CapCloud Platform that some personal data can be shared between CapCloud Clients on the Platform. CapCloud facilitates this for reasons of efficiency and synergy, especially when an individual is associated with multiple Clients of CapCloud. Technically some data can be disclosed through different Sites on the Platform at the same time. These data are limited to training and education information, work experience and general personal profile information, like name, email address, photo etc. Which of these



data are being used on a specific CapCloud Site is solely determined by our Client. This will always be transparent to everyone being member of multiple CapCloud Sites.

Commercial personal data are used for exercising current contracts and for sales and marketing purposes. Sales and marketing will be done within legal boundaries, and CapCloud will not use any of these data for spam. In case of direct mailing an opt-out will always be provided. Commercial data are kept for the duration of commercial relations, and a few years after. Commercial data are transitory information anyway.

Personnel and applicant data are only used internally and kept for the minimum, legally required terms.

Data Protection

CapCloud is committed to a high level of information security management, which is at least in accordance with Dutch and EU privacy law and regulations. CapCloud maintains an information security management system in accordance with ISO 27001, the international standard for information security management. CapCloud also ensures that its core supply chain directly or indirectly dealing with your personal data is working according to this same standard or equivalent.

How to exercise your rights?

Everyone does have certain rights with respect to his or her personal data being processed. These rights include the right of access, the right to rectification, the right to be forgotten, the right to restriction of processing, the right to data portability and the right to object. Should you want to exercise any of these rights, or have any questions about these rights, we advise to address your request in writing to:

1. In case of personal data processed through the CapCloud Platform:
The administrator or privacy contact person of the CapCloud Site you are member of, i.e. the relevant representative(s) of our Client.
We promote that our clients keep this information up-to-date, which can be retrieved via the menu Site Information > Privacy on the Site you are member of.
2. In case of commercial and personnel data processed by CapCloud:
Our Service Desk via servicedesk@capcloud.academy.

Should you not being answered to your satisfaction by our Client or by CapCloud, you may directly contact our Data Protection Officer as indicated in the Introduction.

