

## **Dataceed (Payceed) privacy policy**

### **Policy statement**

This privacy policy sets out how Payceed (Dataceed) ("we", "us", "our") collect, use, store, share and protect personal data provided by users ("you") or collected from you in the course of our business activities. We are committed to being fair and transparent with you about how we process your personal data, ensuring that your privacy is protected and managed appropriately in accordance with applicable data protection legislation. This Privacy Policy also describes your rights and choices regarding our use of your personal information. Please read this privacy policy carefully as it contains important information about who we are, how and why we collect, store, use and share your personal data, your rights regarding your personal data and how to contact us.

- Who we are
- Personal data and the law
- Personal data we collect from you
- How we collect your personal data
- How we use your personal data
- With whom we share your personal data
- Where your personal data is stored
- How long we keep your personal data
- Accuracy of your personal data
- Your rights
- Protection of your personal data
- Links to other websites and social media platforms
- IP addresses
- Cookies - what they are and how we use them
- Useful links

This privacy policy may be updated from time to time. Please check this page to ensure that you are happy with any changes we make. Contact details - if you have any questions or concerns about your personal data and/or our processes, please contact our Data Protection Officer either by:

- E-mail: [info@dataceed.com](mailto:info@dataceed.com)
- Telephone: +32 2 318 06 30
- Mail: for the attention of the EU Data Protection Officer in Brussels

Last updated: May 2024

## **POLICY**

### **Who we are**

This policy applies to the company Payceed (trade name Dataceed) whose company number is: 0747.690.054.

We collect, process, store, disclose and protect personal information (information that can be used to identify an individual) in order to carry out our business activities and primarily to provide business intelligence consultancy, training, coaching, cachback management, review collection, referral programmes, competitions and the recruitment and selection of staff, suppliers and products necessary to provide these services to you (the "Services").

By providing your personal information, you agree that this Privacy Policy applies to how we process your personal information, and you consent to our collection, processing, storage and disclosure of your personal information in accordance with the details of this Privacy Policy (please see section 2 of this Privacy Policy for our legal grounds for doing so, which include your consent to our use and disclosure of your personal information for the purpose for which it was collected, unless you withdraw your consent).

If you do not agree with any part of this Privacy Policy, you must not provide your personal information or the personal information of third parties. Please note that if you do not provide us with your personal information, or if you withdraw the initial consent you provided under this Privacy Policy, this may affect our ability to provide you with Services, or have a negative impact on the Services we provide to you.

### **Personal data and the law**

Personal information is defined as any information relating to an identified or identifiable natural person. It may happen that local laws on the protection of personal data do not apply.

impose more restrictive information processing practices than those set out in this privacy policy.

This Privacy Policy sets out our information practices and management of your privacy in accordance with the Data Protection Act 2018, the UK General Data Protection Regulation (GDPR), the International Data Transfer Agreement for the international transfer of personal data, issued under section 119A of the Data Protection Act 2018, and in force from 21 March 2022 (the "IDTA"), the EU GDPR ((EU) 2016/679 of the European Parliament and of the Council of 27 April 2016) as applicable and in force in the European Union including any amendments, updates, modifications or readjustments to such laws. The legal requirements directly applicable to the Services will be deemed in force by all parties involved in the Services and will form part of this Privacy Policy (unless otherwise agreed in writing).

When processing your data, we rely on one or more legal grounds to process your personal information. We will only process your personal information on one or more of the following lawful grounds:

- Specific consent - you have given your consent to such processing by voluntarily providing us with your personal information. You may withdraw your consent at any time, but this may prevent you from using our Services in the future.
- Performance of a contract - processing is necessary to provide you with our Services.
- Legal obligation - processing is necessary to comply with our legal obligations.
- Legitimate interests - where reasonably necessary to achieve our legitimate interests or those of third parties.

Personal data we collect from you

We generally collect, process and store the following types of personal data that you provide to us:

- Full name
- Email
- Postal address (if applicable)
- Phone number
- Function

In addition to the above, we also collect, process and store the following types of personal data depending on your relationship with us:

- For in-person training - dietary requirements, special requests, health/mobility issues (if applicable) and/or customer service interaction notes
- For virtual training - any special requests, health problems (if applicable) and/or customer service interaction notes
- For applications - CVs and applications
- For cashback: bank account number, anniversary date, proof of purchase
- For reviews: assessment and related comments
- For sponsorships and competitions: contact details for sponsored persons, answers to questions, etc.

- For successful applications - third party pre-employment checks, employment verification information including criminal background checks, third party references, professional or educational certifications/licenses, etc.
- For employees - date of birth, gender, any personal or health information you choose to share with us, learning and development records (including certifications), identification documents, right to work verification documents, any additional information to support your employment with us, provision of benefits and third party emergency contact details.

Where you provide personal information on behalf of a third party, for example by providing emergency or reference contact details, you agree that you have obtained the consent of the other person (the third party) for us to collect, use and disclose their personal information in accordance with this Privacy Policy, and you have informed the third party of your actions and this Privacy Policy.

### **How we collect your personal data**

You may choose to share your personal data with us in a number of ways, including by making an online application or purchasing our Services via our websites, or by taking part in one of our actions, courses or workshops, visiting our websites via cookies, emailing us, completing a survey, via a third party website for applications, with third parties as a named reference, or by providing your contact details by letter or telephone, or by completing an internal form to support your employment or contractual status with us. This may include subscribing to one of our Services, requesting newsletters, obtaining downloads, registering for online events and webinars, contacting us via social media channels, accounting and administration (business to business) or applying for an opportunity.

You may choose not to provide the personal information we request via the Services. However, not providing the requested information may restrict your ability to use certain features of the Services.

### **How we use your personal data**

We use the personal data you have provided to us to provide our Services, respond to your requests, improve our Services, conduct research and analysis about the Services we provide, personalise your experience, track use of the Services, provide feedback to third parties listed on the Services, display relevant advertisements, market our Services, provide customer support, contact you, for recruitment purposes, back up our systems, enable disaster recovery and improve the security of the Services.

We will store your contact details so that we can provide you with information about our products and services that may be of legitimate interest to you. We may also contact you to ask you to complete surveys which we use for research purposes (at your discretion). You may unsubscribe from these communications at any time.

### **With whom we share your personal data**

We share your personal data with your consent, to the extent necessary to complete a transaction or provide a product or service you have requested or authorised and where we have a lawful basis to do so (see clause 2). This includes sharing your personal data with our sub-contractors, subsidiaries and where we are legally obliged to do so.

We may disclose some or all of your personal information to :

- Any member of our organisation or group, including employees of our global subsidiaries described in the policy statement above,
- Other third party contractors and suppliers, including but not limited to benefits providers, travel providers, IT service providers and data hosting providers, parties supporting remote working on customer sites, our banks and external business advisors, such as lawyers, accountants and auditors.

Please be assured that our sub-contractors have contractual agreements in place incorporating data protection provisions as required by law. Our list of subcontractors is available here. In the event of a sale, merger, demerger, acquisition or other corporate reorganisation, your personal data will be shared and processed in accordance with our legitimate interests and those of the third parties involved. In all cases, data will only be shared where appropriate contracts, including confidentiality and/or data transfer obligations (where necessary), have been entered into with the intended recipients of your data.

We will disclose your personal information if we are required to do so to comply with any legal obligation, or to enforce or apply our terms of use, or to protect the rights, property or safety of our businesses, customers or others. This includes exchanging information with other businesses and organisations to protect against fraud and reduce credit risk, or to comply with UK Government or EU regulations.

### **Where your personal data is stored**

The personal data we collect from you is stored in professional data centres located in the European Economic Area, the United Kingdom and/or the United States of America (USA).

Your personal data may be transferred to and stored in the USA, and managed by sub-contractors who support us in the provision of our Services. Personal data of employees and contractors may be shared with third parties and transferred to their storage and sub-contracting destinations to support customer delivery arrangements, including business travel etc. Our list of sub-contractors is available (please see clause 6).

### **How long we keep your personal data**

If you contact us, we may keep a record of that correspondence. We may keep details of your visits to our website including, but not limited to, traffic data, location data, web logs and other communications data, and a record of the resources you access.

We may keep a record of your preferences and interests on the website, other information relevant to customer surveys, offers we have made to you and details of transactions you have carried out on the website and the fulfilment of your orders.

Data is kept for a maximum of 7 years, with the following exceptions:

- Training records are kept in perpetuity as proof that you have completed your training.
- Cashback records are retained in perpetuity as proof of having received/processed your cashback.
- Review and sponsorship records are kept in perpetuity as proof that we have received/tracked your file.
- Applications and CVs that are not pursued are deleted once a position has been filled.
- Personnel files, identification documents and documents verifying the right to work are kept for the duration of your employment plus a further 7 years once your employment has ended.

### **Accuracy of your personal data**

We make every effort to maintain the accuracy and completeness of your personal information. However, you can help us by contacting us if your personal information changes, or if you become aware that we are holding inaccurate personal information about you using the contact details in our policy statement above. We will not be liable for any loss arising from inaccurate, unauthentic, deficient or incomplete personal information provided to us by you or anyone acting on your behalf.

If you believe that the information we hold about you is incorrect or incomplete and you would like to have it rectified, please contact us using the details in our policy statement above. If we accept that the information is incorrect or incomplete, we will take reasonable steps to correct it.

### **Your data protection rights**

As a data subject, you have rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data
- Request rectification of your personal data if it is inaccurate or incomplete
- Request the deletion of your personal data
- Limiting the processing of your personal data
- Oppose the processing of your personal data

- Request the portability of your personal data

You also have the right to withdraw your consent to the processing of your personal data at any time if we rely on your consent to process your personal information. However, withdrawing your consent will not affect the lawfulness of the processing based on the consent prior to its withdrawal.

To exercise these rights, please contact us using the details provided in our policy statement above. We will respond to your request in accordance with applicable law. We may not always be able to respond to your request in full, for example if it affects professional secrecy, the confidentiality of third parties or if we need to protect our rights and legitimate interests. However, we will inform you of how we are responding to your request.

### **Cookies**

We use cookies and other similar technologies (such as web beacons, web beacons, mobile device identifiers and tracking technologies) to collect and store certain information when you interact with our Services, or when you interact with ads, content or features provided by third parties. These technologies may store information such as the unique identifiers of your mobile device or computer, the type of browser you use, your IP address, your language preferences, the referring URL, your browsing behaviour on our Services and the third party website, the pages you have visited, the length of your visit and the time of your visit. The cookies we use may be permanent or temporary. Permanent cookies remain on your device until you manually delete them, while temporary cookies expire when you close your browser.

We use these technologies for a variety of reasons, including to make it easier for you to navigate our Services, to allow you to access your accounts, to store your preferences, to personalise the content we show you, and to analyse how you use our Services and provide you with a better user experience. We may also use cookies to display targeted advertisements on our Services and on other websites and online services, and to measure the effectiveness of those advertisements. Third parties may also use cookies on our Services for the same purposes mentioned above.

By using our Services, you consent to our use of cookies and similar technologies in accordance with this Privacy Policy. If you do not agree to the use of these cookies, please disable or restrict their use in your browser settings. Please note that if you disable or restrict the use of these technologies, some parts of our Services may not function properly.

### **Links to other websites**

Our Services may contain links to other websites, products or services provided by third parties. Please note that this Privacy Policy does not apply to the privacy practices of such third parties. We encourage you to read the privacy policies of those third parties before submitting any personal information to those websites.

### **How we protect your personal data**

We take the security of your personal data seriously and put in place appropriate technical and organisational measures to protect your information from loss, misuse, unauthorised access, disclosure, alteration or destruction. We have put in place policies, procedures and controls to restrict access to personal data to employees, sub-contractors and third parties who need to know that information to perform their functions and to implement and maintain security measures to protect your personal data.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Services; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security measures to try to prevent unauthorised access.

### **Changes to our privacy policy**

We may update this Privacy Policy from time to time to reflect changes in our privacy practices. We encourage you to periodically review this Privacy Policy to stay informed about how we are protecting your personal information. Changes we make to this Privacy Policy will be effective immediately upon posting on this page. Your continued use of our Services following the posting of changes to this Privacy Policy constitutes your acceptance of those changes.

### **How to contact us**

If you have any questions or concerns about our privacy policy, or if you wish to exercise any of your data protection rights, please contact us by email at "info@dataceed.com".

You can also contact us by post at the following address Av. Arnaud Fraiteur 15/23,  
1050 Ixelles  
BELGIUM

If you are not satisfied with our response to your request, or if you have any concerns about our processing of your personal information, you have the right to lodge a complaint with the competent supervisory authority for data protection in your jurisdiction.