



Privacy Policy

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1 Introduction

Your Local Employer of Record (hereinafter referred to as “Your Local Employer of Record”, “We”, “Us” or “Our”) is committed to protecting the privacy and security of your personal information. We take care to safeguard the confidentiality of our consultants, employees, clients and users of our services who communicate with us (online or offline), during meetings or conferences, at events, by telephone, via our mobile apps, websites and social media platforms.

Therefore, we have developed this privacy policy to inform you about the data we collect, what we do with your information, how we protect it, and what rights and choices you have regarding your personal information.

In this document we refer to data protection legislation, in particular the General Data Protection Regulation (GDPR), Regulation (EU) 2016/679 of April 27, 2016, which regulates the processing of personal data in the territory of the European Union, as well as the Dutch GDPR implementation law of 16 May 2018.

Your Local Employer of Record is responsible for the processing of the personal information we process, unless otherwise stated.

You can contact us by telephone, e-mail or by post.

Our main address: Gable House 239 Regents Park Road, London N3 3LF, United Kingdom.

Phone: +44 20 3936 06 80

Email: dpo@hightekers.com

Our data protection officer is: Dr. Louis Sanchez de Lozada.



2. The information we collect and when

We only collect personal information that we know we will actually use, and in accordance with data protection laws. The types of personal information we collect about you may come from sources including third party websites, this website, inquiry/contact forms, events/exhibitions, other contact methods, and may include:

Users of our website

- Your name;
- Your address;
- Your telephone number(s);
- Your email address;
- Your responses to surveys or web forms;
- Data about your involvement with our website, including pages visited;
- Cookies; and/or
- Your IP address and other data relating to your device.

Potential consultants and employees

- Your name;
- Your address;
- Your date of birth;
- Your telephone number(s);
- Your email address;
- Your responses to surveys or web forms;
- Data about your involvement with our website, including pages visited;
- Cookies; and/or
- Your IP address and other data relating to your device.
- Professional biographical information obtained from public sources such as LinkedIn, resume publishing websites and social media platforms.
- Personal information about you provided by another consultant, employer or professional contact that you recommend;
- Feedback about you collected from our customers;
- Your gender;
- Your citizen service number;
- Details of bank account, pay slips and tax information;
- Information about salary, annual leave, pension and secondary employment conditions;
- Your workplace or location;



- A copy of your identity card or passport;
- Your nationality;
- A copy of the visa (if applicable), immigration information, European settlement status or pre-settled status;
- Information relating to recruitment (including copies of right to work documents, references and other information included in a CV or cover letter as part of the application process);
- Work records (including job titles, work history, working hours, working patterns, training records and professional associations);
- Salary history;
- Performance information;
- Time and attendance records;
- Information about disciplinary measures and complaints;
- Information about your use of our information systems and communications.

We may also collect and process special categories of personal data ("sensitive data"), including:

- Information about your health (e.g. disability status).

Customers or employees of customer organizations

- Your contact details;
- Information about your position or position;
- Personal data about communications we have had with you, especially if you have opened or forwarded emails, newsletters or other content we have sent to you;
- Personal information that you may include in feedback or references you provide about our consultants and/or employees (for example, confirmation that a consultant has worked with you);
- We process personal data about you from public sources such as LinkedIn and other social media platforms;
- We process personal data where you have been appointed as one of our delegates or delegates for an event for which the event organizer is authorized to provide us with the contact details of the delegates;
- In the context of our subsequent business relationships, we may expand this personal data to include your address, services and subscriptions used, call and agreement records and payment transactions.



3. How we use your information

Under the General Data Protection Regulation (GDPR), the legal bases we rely on for the collection and processing of this personal data are:

- Your consent. You have the option to withdraw your consent at any time. You can do this by contacting dpo@hightekers.com;
- When the processing is necessary for the performance of an agreement that we have concluded with you;
- When the processing is necessary for compliance with a legal obligation;
- Where the processing is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights override those interests.

Consultants

- To contact you and communicate with you in response to your request, responses to questions, suggestions, problems or complaints about which you have contacted us;
- Making our services available, including net salary calculations;
- Sending prospecting messages to inform you about our services, reports and information, events, promotions and competitions, as well as other content, in accordance with your marketing choices;
- For statistical analysis and feedback from you about our products, websites, mobile apps and other services and activities;
- To power our security measures and services so that you can access our website and mobile apps securely;
- To help us better understand you as a consultant/employee/client and the services you use so that we can better serve you;
- To provide you with online advertisements and promotions;
- Sending information about relevant offers, benefits and rewards, as well as information about other services available from companies in the group;
- Help answer your questions and resolve any issues you encounter;
- To contact you if we think you may be interested in our services in the future;
- To verify your identity;
- To check whether you are legally authorized to work in the Netherlands;
- To pay you, deduct tax and national insurance contributions;
- To pay you a pension and other benefits;
- For business management activities such as accounting and auditing;
- Making decisions about the continuation of your employment or arranging the termination of our contract;



- Assess your suitability for work and manage absenteeism;
- Monitor and ensure compliance with employment and equal opportunities legislation.

Customers and potential customers

- To establish business relationships with you and/or your company;
- For payment and refund processing, if applicable.

4. Who we may share your information with

We may share your personal data with other organizations in the following circumstances:

- When the law or a government agency requires us to share personal information.
- If we need to share personal data to establish, exercise or defend our legal rights (this includes providing personal data to third parties for fraud prevention and reducing credit risk).
- We occasionally use services from other parties to handle certain processes necessary for the operation of the website. However, all shared information is collected and anonymized so that you or any of your devices cannot be identified from this information.
- We use data processors who are third parties and provide services for us. We have entered into data processing agreements with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do so. They will not share your personal information with organizations other than us, or additional subcontractors who are subject to our data processing agreement. They undertake to keep your personal data secure and for the period specified by us.

5. How we keep you informed about our services

We will send you relevant offers and information about our products and services in a variety of ways, including by email, but only if you have previously agreed to receive these marketing communications. When you register on our site we ask if you would like to receive marketing communications, and you can change your online marketing preferences at any time, by email or in writing. If you would like to change your marketing preferences, please email dpo@hightekers.com.



6. Your rights regarding your information

6.1 Right to be informed about the collection and use of personal data

You have the right to be informed about the collection and use of your personal data. We ensure this through our internal data protection policies and our policies relating to external websites. This policy is regularly reviewed and updated to ensure that it is accurate and reflects our data processing activities.

6.2 Right to access your personal data

You have the right to access the personal information we hold about you in many circumstances by making a request. We will provide information free of charge and aim to do so within one month of the date your identity is confirmed. If you would like to exercise this right, please contact us as indicated below.

6.3 Right to rectification of your personal data

If any of the personal information we hold about you is incorrect, incomplete or out of date, you can request that it be corrected. If you would like to exercise this right, please contact us as indicated below.

6.4 Right to restrict processing

You have the right to ask us to restrict the processing of your personal data. This may be, for example, because you have doubts about the accuracy of the data we have or about how we have processed your data. If you would like to exercise this right, please contact us as indicated below.

6.4.1 Right to erasure

You have the right to have personal data erased, also known as the 'right to be forgotten'. This right is not absolute and only applies in certain circumstances. If you would like to exercise this right, please contact us as indicated below.

6.4.2 Right to data portability

The right to data portability gives you the right to receive the personal data that you have provided to a controller in a structured, commonly used and machine-readable format. You also have the right to request that a controller transmit this data directly to another controller. If you would like to exercise this right, please contact us as indicated below.



6.4.3 Right to object

You have the right to object to the processing of all or part of the personal data we have about you. This is an absolute right where we use your data for direct marketing, but may not apply in other situations where we have a compelling reason to do so, such as a legal obligation.

6.5 For more information about your data protection rights

The Dutch supervisory authority regulates issues relating to data protection and privacy in the Netherlands. They provide a lot of information and topics on their website: <https://www.autoriteitpersoonsgegevens.nl>.

You can submit a complaint to the Dutch Data Protection Authority at any time via the form on their website: <https://complaints.autoriteitpersoonsgegevens.nl>. However, we hope that you will first consider reporting any problems or complaints to us. Your satisfaction is extremely important to us, and we will always do our best to resolve any issues you may encounter.

7. Retention period of your information

We retain your personal information to provide you with a high-quality and consistent service. We will always retain your information in accordance with data protection laws and never for longer than necessary to achieve its intended purpose. Unless there is a conflicting legal obligation, your data will be retained for a period of 10 years after our last contact with you, after which it will be deleted.

8. Have your say and share your thoughts

When using our websites, it is your responsibility to set appropriate privacy settings for your social media accounts so that you agree to how your information is used and shared on these networks.

9. Security

Data security is of great importance to Your Local Employer of Record, and to protect your data we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the data collected.

We take security measures to protect your information, including:



- Restricting access to our buildings to individuals who have been identified as having a right to be there (through the use of swipe cards, key card access and other related technologies);
- Implementation of access controls to our information technology;
- Using appropriate technical security procedures and measures (including strict encryption, anonymization and archiving measures) to protect your information across our computer systems, networks, websites, mobile applications, offices and stores;
- Never ask for your passwords;
- Recommend never entering your account number or password in an email or after following a link in an email.

10. What happens if our company changes ownership?

We may, from time to time, expand or reduce our operations, which may involve the sale and/or transfer of ownership of some or all of our operations. Any personal data you have provided will, if relevant to the transferred part of our activity, be transferred to that party. The new owner or operator will, under the terms of this Privacy Policy, be authorized to use this information only for the purposes for which we originally collected it.

11. Changes to our privacy policy

We may change this privacy policy from time to time (for example if the law changes). We encourage you to check this policy periodically to stay informed.

12. How to contact us

If you would like to exercise any of the above rights or if you have any questions or complaints about this policy or how your personal data is processed, please contact us using one of the following methods:

By email: dpo@hightekers.com

By post: Your Local Employer of Record, Gable House, 239 Regents Park Road, London N3 3LF

Phone: +44 20 3936 06 80

Thank you for taking the time to read our privacy policy. This policy was last updated on 29/02/2024.