

Kanoff Legal Privacy Policy

This privacy policy provides details about the personal data Kanoff Legal SPRL/BVBA (hereinafter, “**Kanoff**”, “**we**” or “**our**”) collects from its candidates, clients or website visitors (hereinafter together “**you**” or “**your**”) and how it is processed. The website of Kanoff can be found at www.kanofflegal.com (hereinafter the “**Website**”).

Kanoff is committed to protecting your privacy. The purpose of this privacy policy (hereinafter the “**Policy**”) is to provide you with transparent, clear information about our data protection practices and policies as data controller. Kanoff seeks to put you in control of your personal data and to help you understand, in accordance with the applicable legislation, how and why we use your personal data.

The concept of personal data is broad and encompasses any type of information related to you, as a directly or indirectly identifiable natural person. We recommend you read this privacy policy carefully in order to better understand our practices regarding the processing of your data.

Protecting your data and privacy is of the utmost importance for us at Kanoff. We comply with data protection laws, including the European Regulation 2016/679 of 27 April 2016 on the protection of personal data (the “**GDPR**”) and any other applicable national acts or regulations regarding the processing of personal data or the protection of privacy.

1. Kanoff’s role as data controller

Kanoff is the data controller responsible for the processing of your data. Kanoff’s offices are located at Avenue Louise 279, 1050 Brussels, Belgium and registered with the Crossroads Bank for Enterprises under number 0473.236.769.

As a data controller we solely and autonomously determine the purposes and the means by which your personal data is processed.

2. What data does Kanoff collect?

We collect and process your personal data only for the purposes set out in this Policy. Your data can either be submitted to us, or collected by us, in different ways (including via written correspondence, e-mails, or during meetings with our consultants).

We do not use technical means such as cookies, device fingerprinting or the like to collect information. We collect information only by use of methods which you will/are able to become aware of.

2.1 Candidates:

In order to work with us, you will provide us with a current CV which will be used either for a specific job(s) and/or to have our recruitment consultants inform you about opportunities as they arise.

From our candidates we may collect personal details, including without limitation: name, e-mail address, physical address, telephone number and other relevant information from your Curriculum Vitae (“**CV**”) including additional, relevant information concerning your professional history.

Your CV will be stored in our internal database for consultation by our consultants. In addition, your CV may, but only with your prior permission, be shared with our clients (see section 4.1).

Given the personal nature of CV’s, occasionally sensitive information (such as political affiliation, ethnic origin, or the like) may be included by you in your CV. Kanoff does not knowingly collect sensitive personal information from individuals and encourages candidates not to submit sensitive personal information to us. If, however, a candidate transmits sensitive personal information to Kanoff, and unless that information is relevant to analyse your professional abilities or personality, we will delete it.

Further information may be collected from a candidate during our communications with you as well as from third parties (for example, through our follow up procedure with clients to whom your CV was (with your advance permission) provided).

2.2 Clients

In order to provide our services to clients as well as for purposes of client administration we may collect the name/s, e-mail address/es, country, telephone, cell phone, and fax numbers of client contact personnel.

2.3 Website visitors

Kanoff does not use cookies, device fingerprinting nor other similar techniques. We only collect information that you would decide to share with us, for instance by sending us an email.

3. On which legal basis and for what purposes do we process your data?

We always process your personal data on the basis, and within the boundaries of the legal principles as laid down under the applicable law. We do our utmost to limit the processing of your personal data to that which is strictly necessary for the achievement and performance of the purposes described below.

3.1 Your consent

Subject to obtaining your prior and specific consent and in accordance with the applicable law, we may process personal data, such as a candidate's contact details, information featured in your CV, or information voluntarily provided by a Website visitor. Providing your personal information to Kanoff constitutes your express consent to allow us to process such information for the purposes set out in this Policy.

Such personal data is processed in order to notify candidates of new job opportunities, and, should you be interested, and grant us your express approval to act on your behalf for a particular position/s, to convey your name and professional profile, on a strictly confidential basis, to potential employers seeking candidates with similar profiles. We will never share any of your personal or professional information with other third parties absent your permission to do so. Kanoff remains committed to protecting the personal information of users of our website and our services.

Further purposes may include providing ancillary services as a recruitment agency to connect the candidate to a client, keeping contact with an eye to notifying a candidate about specific positions as they arise as well as further communications regarding our services.

3.2 Performance of our duties

We may also process candidates' or clients' personal data wherenecessary for the performance of our legal duties or the performance of our contractual obligation towards our clients. In such a case, we limit the processing of your personal data to the extent strictly necessary.

(a) Legal obligation

Kanoff may process your personal data in order to respond to queries from regulatory or law enforcement agencies where we are required to do so (see below section 4.2).

(b) Contract

Client data may be processed where necessary for the performance of contracts with clients including client management, the provision of recruitment services connecting clients to candidates, as well as for communications regarding the service and client administration.

3.3 Legitimate interests of Kanoff

When not strictly necessary for any of the above-mentioned purposes Kanoff may also process your personal data for other reasons including the achievement and the realisation of its legitimate interests. In such cases, however, Kanoff will always strive to maintain a fair balance between the need to process your data and the protection of your privacy. Whenever this is the case, Kanoff will keep you informed regarding the type of legitimate interest we are pursuing and will provide you with transparent information about the processing operations and your rights.

In particular, we may process your personal data for the following reasons:

- To notify candidates about future job opportunities beyond the specific role for which they have contacted us or to notify clients about potential opportunities beyond a specific mission;
- To maintain our business relationship, whether you are a website visitor, candidate or client, including by sending you occasional updates or general information about Kanoff;

4. With whom and how do we share your data?

4.1 Clients

We disclose the personal information of candidates to clients for the purpose of our activities as set out above. Kanoff may share this personal data with a client which has communicated vacancies corresponding to your profile and in which you have indicated to us your interest.

4.2 Law enforcement and public authorities

Where required by a public authority or a law enforcement agency, we may share your personal data in accordance with applicable law and only to the extent necessary.

4.3 Processors

We rely on contractually bound third-party companies and external service providers (referred to as “processors”) in order to provide our services. In such cases, personal data will be shared with these processors in order to allow them to continue providing their services to us. The processors are permitted to use the data only for the purposes specified by us. Furthermore, they are contractually obligated to handle your data exclusively in accordance with this privacy policy and in line with the applicable data protection laws.

More specifically, we use the services of the following processors in particular:

- business development providers;
- IT service providers for the provision of hardware and software as well as for the implementation of maintenance work.

Data is disclosed to processors on the basis of Article 28(1) of the GDPR or, alternatively, on the basis of our legitimate interests in the economic and technical advantages associated with the use of specialised processors and on the basis of circumstances in which your rights and interests in the protection of your personal data are not overridden (see point (f) of Article 6(1) of the GDPR).

5. What are your rights?

5.1 Access, rectification, erasure, portability and objection rights

For all the purposes defined above, and subject to applicable data protection laws, you have the following rights:

- the right to ask us to provide you with copies of personal data held about you at any time, which includes the right to inquire: whether we process your personal data, for what purposes; the categories of data; the recipients to whom the data are shared;
- the right to ask us to update or correct any out-of-date or incorrect personal data that we hold about you;
- the right to withdraw your consent where such consent has been given;
- the right to erasure within the limits afforded by data protection legislation;
- the right to oppose the processing of your personal data, within the limits afforded by data protection legislation;
- the right to data portability within the limits afforded by data protection legislation.

5.2 How can you to exercise your rights?

You may at any time exercise the abovementioned rights in accordance with data protection regulations, by sending a request with a copy of your ID card (passport or other proof of identity) to rk@kanofflegal.com or by writing us at Avenue Louise 279, third floor, 1050 Brussels, Belgium, and subject to complying with our reasonable requests to verify your identity.

5.3 Right to lodge a complaint

You may also lodge a complaint with the Belgian Data Protection Authority either by post at Rue de la Presse 35, 1000 Brussels, or by e-mail at contact@apd-gba.be or by phone at +32 2 274 48 00 or first-line assistance at +32 2 274 48 78.

6. How long do we keep your personal data?

We will not store your personal data beyond the time necessary for the performance of the purposes for which the data is processed. Specifically, we distinguish between a retention period and an archiving period:

- The retention period is the maximum period of use of your personal data for specific purposes:
 - the data processed for the execution of the contractual relationship or the performance of a legal duty is kept for the entire duration of the contract, or as long as the legal duty applies, and for the prescription period upon termination of the contract or of the legal obligation;
 - the data processed for other purposes may be retained for a longer period during which we will reassess the need to keep this data and pseudonymize the data where it does not affect the realisation of the purposes.
- The archiving period meets our legal obligation as well as the legal need to retain your data beyond the retention period for evidentiary purposes or to respond to requests for information from the competent authorities.

7. How do we protect your personal data?

We take appropriate technical and organisational measures to safeguard and protect your personal data against unauthorised or unlawful processing and against accidental destruction, loss, access, misuse, damage and any other unlawful forms of processing of personal data in our possession.

8. How can you contact us?

If you have any questions or comments about this privacy policy, if you would like to exercise your rights, or to update the information we have about you or your preferences, please contact us by post at Kanoff Legal, Avenue Louise 279, third floor, Brussels 1050, Belgium; or by email to rk@kanofflegal.com.