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*with a personal touch*

# GDPR Privacy Policy

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Octagon Professionals BV

**Version 1.4**

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Professionals

<b>Code</b>	<b>Title</b>	<b>Date</b>	<b>Prepared by</b>	<b>Approved by</b>
QMS-GDPR-POL-01	GDPR Privacy Policy	17/02/2025	Benedetta Podestà, Vincenzo Toscani	Pambos Kyritsis

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## **OCTAGON PROFESSIONALS BV PRIVACY POLICY**

### **Information provided pursuant to Art.13 and 14 of EU Reg. 2016/679 (hereinafter GDPR)**

We are Octagon Professionals International B.V. We are committed and see it as our responsibility to protect your privacy. We collect and process your personal data in accordance with the General Data Protection Regulation (GDPR). We only process your personal data for the purposes set below. In this privacy policy, we would like to inform you about the personal data we collect, how we collect this data, why and when we collect this data, and how we protect this data.

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ANNEX I: Information Security Incident Management Policy

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## 1. Purpose and procedure for the processing of personal data

### Why do we collect your personal data?

We collect and process your personal data for the execution of our services, including recruitment & selection, personnel management, administration, employment and payroll. Collecting and processing. Data may be processed on paper, by automatic or electronic means, including post or e-mail, telephone (e.g. automatic calls, SMS, MMS), fax and other means (e.g. websites).

### Scope of processing

Data are processed by internal subjects duly authorized and instructed pursuant to Article 29 of the GDPR. It is also possible to request the scope of communication of personal data, obtaining precise information on any external parties who operate either as Data Processors or Independent Data Controllers (consultants, technicians, banking institutions, transporters, etc).

## 2. Consequences of failure to provide data

Transmitting data is never mandatory. However, failure to provide the Data marked as mandatory will prevent the Company from providing the Service. On the other hand, failure to provide optional Data will still allow you to access the Service.

## 3. Data recipients

Personal Data may be processed by natural persons and/or legal entities operating on behalf of the Company and by virtue of specific contractual obligations.

### General information

Data subjects (pursuant to Art.4, c.1 of the GDPR) are informed of the following general profiles, valid for all areas of processing:

- all data are processed in accordance with current privacy regulations (EU Reg. 2016/679);
- all data are processed in a lawful, correct and transparent manner towards the data subject, in compliance with the general principles provided for by Article 5 of the GDPR;
- specific security measures are observed to prevent the loss of data, illicit or incorrect use and unauthorized access (GDPR, Art.32).

#### 4. Transfer of data outside the EU

Personal data are not subject to dissemination or transfer outside the EU (they may be subject to transfer outside the EU only in compliance with the conditions set out in Chapter V of the GDPR, aimed at ensuring that the level of protection of the data subjects is not compromised "Art.45 Transfer on the basis of an adequacy decision, Art.46 Transfer subject to adequate safeguards, Art.47 Binding rules of enterprise, Art.49 Specific exceptions"). Data are also not subject to automated processes that produce significant consequences for the data subject. The management of databases and the processing of Data are related to the purposes of the processing and are carried out in accordance with the applicable data protection legislation.

#### 5. Data controller and data protection officer

The Data Controller is the undersigned Company (in the person of its pro-tempore legal representative) who can be contacted for any request regarding the processing of personal data or the exercise of rights as listed below, at the following addresses:

##### Data Controller

Octagon Professionals  
Address: Maanweg 174, 2516 AB Den Haag  
Tel. +31 (0)70 324 9300  
E-mail: [info@octagon.nl](mailto:info@octagon.nl)

##### Director and Pro-Tempore Legal Representative

Name: Pambos Kyritsis  
Date of birth: 01 NOV 1960  
BSN - Fiscal personal identification number: 2061.15.702  
E-mail: [pambos.kyritsis@octagon.nl](mailto:pambos.kyritsis@octagon.nl)

##### Data Protection Officer

Name: To be appointed  
Date of birth:  
BSN -  
E-MAIL:

## 6. Legal basis

The Data Controller processes Personal Data relating in the event that one of the following conditions exists:

- the User has given consent for one or more specific purposes; Note: in some jurisdictions, the Data Controller may be authorized to process Personal Data without the User's consent or another of the legal bases specified below, until the User objects ("opt-out") to such processing. However, this is not applicable if the processing of Personal Data is governed by European legislation on the protection of Personal Data;
- the processing is necessary for the performance of a contract with the User and/or the execution of pre-contractual measures;
- the processing is necessary to comply with a legal obligation to which the Data Controller is subject;
- the processing is necessary for the performance of a task carried out in the public interest or for the exercise of official authority vested in the Data Controller;
- the processing is necessary in order to pursue the legitimate interest of the Data Controller or third parties.

However, it is always possible to request the Data Controller to clarify the legal basis of each processing and in particular to specify whether the processing is based on the law, provided for by a contract or necessary to conclude a contract.

Failure to provide the aforementioned data will make it impossible to establish a relationship with the Data Controller. The aforementioned purposes represent, pursuant to Article 6, paragraphs b, c, f, suitable legal basis for the lawfulness of the processing. If it is intended to carry out processing for different purposes (e.g.: marketing communications, production of photo/video content, etc.), the data subjects will be asked for specific consent.

## 7. Data processing of data related to the website operation

This site processes user data in a lawful and correct manner, adopting the appropriate security measures aimed at preventing unauthorized access, disclosure, modification or destruction not only in the form of unauthorized access.

**Authorized data:** the processing is carried out using IT and/or telematic tools, with organizational methods and logics strictly related to the purposes indicated.

In addition to the data controller, in some cases, categories of persons in charge involved in the organization of the site (administrative, marketing, commercial, legal, system administrators) or external parties such as (such as third-party technical

service providers, postal couriers, hosting providers, IT companies, communication agencies) may have access to the data.

Among the Personal Data collected by [www.octagonpeople.com](http://www.octagonpeople.com), independently or through third parties, there are: Cookies; Usage data; email; name; telephone number; various types of Data.

Full details on each type of data collected are provided in the dedicated sections of this privacy policy or through specific information texts displayed before the data is collected.

Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically during the use of [www.octagonpeople.com](http://www.octagonpeople.com).

Unless otherwise specified, all Data requested by [www.octagonpeople.com](http://www.octagonpeople.com) is mandatory. If you refuse to provide them, it may be impossible for Octagon Professionals to provide the Service.

In cases where some Data [www.octagonpeople.com](http://www.octagonpeople.com) indicates as optional, Users are free to refrain from communicating such Data, without this having any consequence on the availability of the Service or its operation.

Users who have doubts about which Data are mandatory, are encouraged to contact the Data Controller.

Any use of Cookies - or other tracking tools - by [www.octagonpeople.com](http://www.octagonpeople.com) or by the owners of third-party services used by the Company's website, unless otherwise specified, has the purpose of providing the Service requested by the User, in addition to the additional purposes described in this document and in the Cookie Policy, if available.

The User assumes responsibility for the Personal Data of third parties obtained, published or shared through [www.octagonpeople.com](http://www.octagonpeople.com) and guarantees that he/she has the right to communicate or disseminate them, freeing the Data Controller from any liability towards third parties.

## Cookies

Octagon Professionals International B.V. applies the cookie policy to the website, as hereinafter detailed. This cookie policy explains how and why cookies may be used and stored when you visit our website. This Cookie policy should be read together with our privacy statement.

### What are cookies?

Cookies are a small package of data, sent from a website, that can be stored on your computer or mobile device. Almost every website uses cookie technology.

These cookies are designed to help websites remember things about their visitors, for example, to recognize visitors on subsequent visits. Cookies help us to provide our users with a better user experience while visiting our website.

This site uses cookies to make the user's browsing experience easier and more intuitive: cookies are small strings of text used to store some information that may concern the user, his preferences or the device of access to the internet (computer, tablet or mobile phone) and are mainly used to adapt the operation of the site to the user's expectations, offering a more personalized browsing experience and remembering the choices you have previously made.

A cookie consists of a small set of data transferred to the user's browser from a web server and can only be read by the server that made the transfer. It is not executable code and does not transmit viruses.

Cookies do not record any personal information and any identifiable data will not be stored. If you wish, you can prevent some or all cookies from being stored. However, in this case the use of the site and the services offered may be compromised. To proceed without changing the options relating to cookies, simply continue browsing.

Below are the types of cookies that the site uses:

### **Types of Cookies**

There are two categories of cookies, essential cookies and non-essential cookies.

**Essential cookies** are cookies that are essential for the operation of our website. These cookies enable certain features on our website, without these cookies you would not be able to use the website as intended.

**Non-essential cookies** are cookies that are not essential for operating our website. There are three categories of non-essential cookies.

**Functional cookies:** Collect information about your personal preferences on a website.

**Analytical cookies:** Collect information about the behaviour of visitors on a website to measure the performance of the website and to improve the user experience.

**Advertising cookies:** Monitor (the surfing behaviour of) visitors to create customer and user profiles (usually for personalized advertisements). They are used to measure the effectiveness of ad campaigns.

### **Cookies we use**

This website only uses analytical cookies, the other categories of cookies are not used on this website. This means we do not use cookies on the website to collect



your personal information in any way. Under the new privacy law (GDPR) IP addresses are identified as personal identifiable information. To comply with the GDPR all IP addresses from our visitors will be anonymized. This means that we collect information in a way which does not identify anyone. The processing of the anonymized information collected from analytical cookies is done on the basis of legitimate interest.

### **Why do we use cookies**

To track the number of visits to our website and the movement on our website (which pages are visited, on what page the website is left, time spent on pages and time spent on the website). This information is used to improve the user experience on our website.

COOKIES that are inserted in the browser and retransmitted through Google Analytics or through the blogger statistics service or similar are technical only if used for the purpose of optimizing the site directly by the owner of the site itself, who may collect information in aggregate form on the number of users and how they visit the site. Under these conditions, the same rules apply, in terms of information and consent, to Analytics COOKIES, as to technical cookies.

From the point of view of duration, a distinction can be made between temporary session cookies that are automatically deleted at the end of the browsing session and are used to identify the user and therefore avoid logging in to each page visited, and permanent cookies that remain active on the PC until they expire or are deleted by the user.

Session cookies may be installed in order to allow access and permanence in the reserved area of the portal as an authenticated user.

They are not stored persistently but exclusively for the duration of the navigation until the browser is closed and disappear when the browser is closed. Their use is strictly limited to the transmission of session identifiers consisting of random numbers generated by the server necessary to allow safe and efficient exploration of the site.

### **Third-party cookies**

In relation to the origin, a distinction is made between cookies sent to the browser directly from the site you are visiting and third-party cookies sent to your computer from other sites and not from the one you are visiting.

Persistent cookies are often third-party cookies.

Most third-party cookies are tracking cookies used to identify online behaviour, understand interests and thus personalize advertising proposals for users.

Third-party analytical cookies may be installed. They are sent from the domains of these third parties external to the site.

Third-party analytical cookies are used to collect information on user behaviour. The survey is anonymous, in order to monitor performance and improve the usability of the site. Third-party profiling cookies are used to create user profiles, in order to offer advertising messages in line with the choices expressed by the users themselves.

### **Google analytics**

For the analysis of our cookies, we use Google Analytics, a web analytics service provided by Google. The information that is generated by our cookies will be stored on Google services in the United States. Google may transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

### **Profiling cookies**

Profiling cookies are those that create profiles for the user and are used in order to send advertising messages in line with the preferences expressed by the same in the context of web browsing.

When using these types of COOKIES, the user must give explicit consent.

Article 22 of EU Regulation 2016/679 and Article 122 of the Data Protection Code will apply.

### **More information**

If you have any questions concerning this cookie policy, please contact us at [datasupport@octagon.nl](mailto:datasupport@octagon.nl).

## **8. Data processing related to customer, legal entities, and suppliers**

### **Subject matter of the processing**

Processing operations that are essential for the execution of the contract with the customer and for the execution of the company's services, including recruitment & selection, personnel management, administration, employment and payroll.

**Categories of data subjects:** Customers or Members, actual and/or potential suppliers, candidates, professionals, counterparties, auditors, mailing lists, partners.

**The Company processes data collected from candidates & applicants:** First and last name, residential address, Date of birth, Contact information (Email address and

telephone number), information described in the CV (Employment history, Education history etc.).

**Personal data collected from companies and company contacts:** Name, Contact information (email address and telephone number), Job title, Job preferences. Personal identification data, Electronic identification data, Financial identification data, Loans and pensions details, Professional activities, Work permits, Immigration status, Physical description, Consumer behaviour, Marriage or current form of cohabitation, Details of other family members.

**In particular:** Tax code and other personal identification numbers, bank details, residential address, e- mail address, telephone number, name, address or other personal identification elements, personal, health and personal data present in the medical certificates of employees, data relating to criminal convictions.

**In general:** consent of the data subject for a specific purpose. Execution of a contract; The processing is required in order to comply with a legal obligation. The processing is necessary in order to satisfy a legitimate interest. The processing is necessary for the performance of a contract to which the data subject is a party or for the execution of pre-contractual measures adopted under a specific request of the data subject. The processing is necessary for compliance with a legal obligation.

### Data breach

In case of a suspected data breach we ask you to reach out to management and report this immediately by sending us an email at: [datasupport@octagon.nl](mailto:datasupport@octagon.nl)

Or write to:

Octagon Professionals BV

Maanweg 174

2516 AB Den Haag

The Netherlands

Or Call our office and ask for Data Processing Officer / General Manager:

+31 (0)70 324 9300

Or, use our contact Web Form:

<https://www.octagonpeople.com/contact/>

## 9. Data retention and processing methods

The processing of personal data is carried out by means of the operations indicated in Art. 4 no. 2) GDPR and precisely: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Personal data are processed both on paper and electronically. The Data Controller will process personal data for the time necessary to fulfil the purposes for which they were collected and related legal obligations.

The duration of data processing and retention is proportional to the time that is deemed to be necessary in order to achieve the purpose and in any case no longer than **2 years** from the termination of contract.

See:

<https://www.autoriteitpersoonsgegevens.nl/themas/werk-en-uitkering/personeelsgegevens/personeelsdossier>

The data retention period is extended to **7 years** for fiscal / tax management reasons, according to the provisions of the Dutch tax authority (The Belastingdienst).

See also:

[https://www.belastingdienst.nl/wps/wcm/connect/bldcontentnl/belastingdienst/zakelijk/btw/administratie\\_bijhouden/administratie\\_bewaren/](https://www.belastingdienst.nl/wps/wcm/connect/bldcontentnl/belastingdienst/zakelijk/btw/administratie_bijhouden/administratie_bewaren/)

## 10. Rights of data subjects

The Data Subject has at any time, the right to exercise the following rights:

1. **Right to be informed:** Individuals have a right to be informed about how their data is collected and used. Data controllers have to give clear and concise information to individuals, including what information is collected and used, its purposes, retention periods, and with whom the information will be shared. This privacy information must be very easy to understand and easily accessible to the individual. GDPR defines the right to be informed in articles 12-14.
2. **Right of Access:** Individuals have the right to access and receive a copy of their personal data, including metadata. This process is called subject access request or "SAR". Data controllers must provide this access free of charge and in an accessible format. GDPR defines the right to access in article 15.
3. **Right to Rectification:** Individuals have the right to have inaccurate personal data rectified or completed if the data is incomplete. A request may be made verbally or in writing. The right to rectification underpins the principle of

- accuracy (Article 5(1)(d)) of the GDPR and is a safeguard against discriminatory treatment. (Art. 16 GDPR).
4. **Right to erasure:** The GDPR introduced a right for individuals to have their data deleted. This right is sometimes referred to as the “right to be forgotten”. This right is not an absolute right and can be limited in certain situations. The right only applies to data held at the time the request is received. You may still have the right to use data that may be created in the future. (Art. 17 GDPR).
  5. **Right to restriction of processing:** when certain conditions are met, the User may request the restriction of the processing of their Data. In this case, the Data Controller will not process the Data for any other purpose than their storage. (Art. 18 GDPR)
  6. **Right to data portability:** the User has the right to receive his/her Data in a structured, commonly used and machine-readable format and, where technically feasible, to obtain its unhindered transfer to another controller. This provision is applicable when the Data are processed with automated tools and the processing is based on the User's consent, on a contract to which the User is a party or on contractual measures connected to it (Art. 20 GDPR).
  7. **Right to object:** individuals have the right to object to the processing of their data in certain circumstances. An objection may be made in writing or verbally. An objection can concern all data or certain information or relate to a specific purpose. The individual has an absolute right to stop direct marketing based on personal data (Art. 21 GDPR).
  8. **Rights concerning automated decision-making and profiling:** Automated individual decision-making means decisions without any human involvement. Examples can include: a bank's decision to award a loan or not based on an online process; an aptitude test using preprogrammed algorithms and criteria to sort through job applicants and decide who will receive a job interview. GDPR defines rights concerning automated decision-making and profiling in article 22. Automated decision-making must not include profiling, but it often does. GDPR defines profiling as: “any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.”

## 11. Details on the right to object

When Personal Data are processed in the public interest, in the exercise of official authority vested in the Data Controller or to pursue a legitimate interest of the Data Controller, Users have the right to object to the processing for reasons related to their situation.

Users are reminded that, if their Data are processed for direct marketing purposes, they can object to the processing without providing any reason. To find out whether the Data Controller processes data for direct marketing purposes, Users can refer to the respective sections of this document.

## 12. How to exercise your rights

To exercise the User's rights, Users may send a request to the contact details of the Data Controller indicated, specifically by writing to:

Octagon Professionals,  
Maanweg 174, 2516 AB Den Haag,  
Tel. +31 (0)70 324 9300,  
E-mail: [info@octagon.nl](mailto:info@octagon.nl)

Requests are filed free of charge and processed by the Data Controller as soon as possible, in any case within one month.

## 13. Further information data processing

### Defence in court

The User's Personal Data may be used for the defence by the Data Controller in court or in the preparatory phases of its possible establishment, from abuses in the use of the same or related services by the User.

The User declares to be aware that the Data Controller may be required to disclose the Data upon request of public authorities.

### Specific information

At the request of the User, in addition to the information contained in this privacy policy, Octagon Professionals BV may provide the User with additional and contextual information regarding specific services, or the collection and processing of Personal Data.

### System logs and maintenance

For any purpose related to operation and maintenance, this site and any third-party services used by it may collect System Logs, i.e. files that record interactions, and which may also contain Personal Data, such as the User's IP address.

### **Information not contained in this policy**

More information in relation to the processing of Personal Data may be requested at any time from the Data Controller using the contact information.

### **Changes to this privacy policy**

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to Users on this page. In the event of non-acceptance of the changes made to this privacy policy, the User is required to cease using this site and may request the Data Controller to remove their Personal Data. Unless otherwise specified, the previous privacy policy will continue to apply to Personal Data collected up to that point.

## **14. Modifications to the present document**

This document constitutes the privacy policy of Octagon Professional BV and its website.

The Data Controller reserves the right to make changes or updates to this privacy policy at any time by notifying Users on this page and, if possible, on the website and, if technically and legally feasible, by sending a notification to Users through one of the contact details in its possession. Please consult this page frequently, referring to the date of last modification indicated at the bottom.

If the changes concern processing whose legal basis is consent, the Data Controller will collect the User's consent again, if necessary.