



Privacy policy and data protection at Leadhunter B.V.

(tightened up in line with the GDPR of May 2018)

1. Background

Leadhunter works with confidential data of clients and is fully aware of the responsibility this entails. Every employee, when taking up employment with Leadhunter (either directly or through a hirer), immediately signs a nondisclosure agreement. The data received from the client and processed is stored on European servers and processed through a secure connection (https). In addition, for each assignment the 'need to know' principle is followed: the data of the client and the assignment concerned is only visible to the employees working on it at that moment. Our clients involve us in their commercial activities and that demands mutual trust. We want to maintain that trust by properly protecting the data supplied and collected.

A further dimension has been added with the introduction of the GDPR: we also want to be careful with the personal data we collect from prospects (potential customers) for our clients. That is why we have amended our privacy policy to meet the legal requirements concerning the retention policy, organization, data recording and the 'right to be forgotten'.

The recording of personnel data (Leadhunter employees) is also subject to this new legislation. We have of course taken that into account in this update of our privacy policy.

2. General

Leadhunter does not carry out profiling at a personal level, nor does it send bulk mails or sell databases with business data. Furthermore, Leadhunter works solely Business-to-Business and is not involved in acquisitions towards consumers.

The only personal data we process are those of contact persons within the businesses we approach on behalf of our clients, and naturally the direct contact information of our clients themselves and those working at Leadhunter. The internal rules for this have been brought in line with the requirements under the GDPR.

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3. Retention location and protection of databases

Leadhunter works entirely in the cloud. This means that no local data are stored at employees' workplaces. All systems run on European servers that are certified in accordance with ISO 27001 and dedicated for the Leadhunter application. The connection between workplace and server is through a secure and encrypted internet connection (https).

A database uploaded by the client can only be seen in its entirety by the client itself, Leadhunter's internal assignment supervisor and the system administrator. Other employees do work in the database, but only get to see the data they are actually working on at that moment. A logfile is created of all consultations of the data.

The client may access, download or amend the client's own database or delete it from Leadhunter's systems.

4. Different kinds of data and retention policy

Although most, but not all, of the data recorded by Leadhunter is not traceable to individuals, this does not apply to all data. There is also data that is used for all clients and data that is assignment-specific. A different privacy policy is therefore in place for different types of data.

4.1. General business data:

- Generally available information such as name and address, telephone number, website, sector, number of FTEs, etc.;
- The general business data that clients upload will be cross-checked against the general data already available about these businesses from other assignments. Any omissions and errors will then be corrected immediately (e.g. if a business has relocated, has changed its name or no longer exists);
- These general data are actively checked and amended where necessary by Leadhunter's call agents. If the data are older than 6 months, the call agent will be notified with a request to verify and/or amend the data;
- These general data are not subject to a retention period (are not automatically deleted), merely a monitoring period: after 6 months a notification will be issued to verify the data
- If clients download their database again, they will obtain the most up-to-date information; any amendments or additions will have been processed.

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4.2. Data traceable to individuals:

- Name of a contact person, direct email address, direct telephone number, etc.
- These data are subject to the GDPR and so there must be grounds to store and process these data. The GDPR gives six grounds:
 - Consent
 - Contract
 - Statutory obligation
 - Vital interests
 - General interest / duty of public authority
 - *Legitimate interests*
- Within the framework of the GDPR, 'Marketing' comes under the ground of legitimate interests: See recital 47 of the GDPR: 'The processing of personal data for direct marketing purposes may be regarded as carried out for a legitimate interest';
- Data traceable to an individual that clients upload will be cross-checked against the data already available from other assignments. Any omissions or errors (e.g. a job change or a different email address) will be corrected immediately in this way. If a person is shown to be no longer employed, his or her data will be deleted immediately;
- These data traceable to an individual will be actively checked by Leadhunter's call agents. If the data are older than 6 months, the call agent will be notified with a request to verify the data before use;
- These data traceable to an individual will be earmarked after six months for verification (the call agent may not use these data without having verified them). The retention period for unverified data is 12 months (six months after having been earmarked for verification), after which, if the data have not been verified, they will be automatically deleted;
- If clients download their database again, they will view the most up-to-date data; any changes or additions will have been processed and deleted data will also have been deleted in the download.

4.3. Conversation reports:

- A report will be made of every conversation in the name of our client;
- These reports are in writing (no audio recordings), static (not searchable) and are not used for profiling. The reports serve purely as reference information for the client in order to read about the progress and results of the assignment, and as proof for Leadhunter of services provided. The names of persons may appear in the text of the conversation reports. The reports can be sorted by company name, result and date, not by contents (i.e.: not by persons' names or job title);
- The conversation reports are not subject to a retention period, which means they are not automatically deleted. The client can delete the assignment, which means that the conversation reports will also be deleted;
- These notes of conversations are only visible to the client for whom they have been made, to the assignment supervisor concerned, to the system administrator and to the call agents working on the assignment. Once the assignment has been completed, it is made 'non-active' and the notes of conversations are no longer visible to the call agents. The client will then still be able to make a download of the database concerned, including the reports.

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5. Processing agreement

A new processing agreement is entered into for each new assignment that a client awards Leadhunter. This agreement lays down how Leadhunter will handle the personal data supplied. By entering into this processing agreement, the client gives consent for Leadhunter's employees to approach the prospects concerned in his/her name, within the preconditions that have been set for the assignment.

6. Contact details of clients

On the grounds of an agreement, data of contact persons at Leadhunter's clients are recorded. These data include such information as name, job title, email address, direct telephone number, social media accounts and further personal data that may be useful for the business relationship. These data will be retained even after the assignment has been completed. These data can be accessed by all assignment supervisors at Leadhunter, by the system administrator and in the case of active assignments also by the call agents scheduled for that assignment.

7. Right of access, rectification and the right to be forgotten

Every person (the data subject) who has reason to believe that Leadhunter has retained personal data concerning him or her in the database may ask to access these data. The request will be made using the form available for that purpose on the website, following which the authenticity of the request will be investigated and the data subject will receive an answer to the request within 14 days. The data subject has the right to rectify the data in the case of proven inaccuracies, or to erase the data from the database. If it concerns data that Leadhunter is handling for a client, the client will be informed about the erasure of the data concerned from the Leadhunter database and will be requested to remove this person for future assignments.

8. Contracted work

If Leadhunter contracts work to third parties that will necessitate the exchange of personal data, a processing agreement will be drawn up for this purpose. The retention period and conditions in this agreement may never be more generous than the terms that Leadhunter has laid down in its own procedures and agreements.

9. Processing of data of Leadhunter's employees and job applicants

Personal data of all employees working directly or indirectly for Leadhunter will be stored to enable the correct processing of time sheets and wages. Reports of the employee's performance and notes of any conversations may also be stored. These reports will be retained for up to five years following the employee leaving Leadhunter's employment and will be visible only to the directors of Coöperatie Leadhunter U.A.

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If payroll services are contracted out, Leadhunter will enter into a processing agreement with the processor of these data in order to protect the employees' privacy. The processor will make itself known to the employee concerned and explain the retention policy of the data concerned on request.

The emails that employees send via the Leadhunter mail system are expected to be purely business emails (the @serviceafdeling.nl and @leadhunter.nl mailboxes are not intended for personal emails or private email communication). These emails may be viewed by the assignment supervisor, the internal coach and the system administrator for coaching or follow-up purposes. This email traffic is regarded as business traffic in the name of Leadhunter and therefore is not subject to a retention period. Should an email accidentally contain personal data that the employee wishes to have removed, he or she should contact the management board of Coöperatie Leadhunter U.A.

Data of job applicants will be retained for one year following the rejection of the candidate. Upon entering into employment or a cooperation arrangement, the information supplied by the job applicant and the reports of the interviews conducted will be added to the personnel file and the aforementioned retention policy will apply.

10. Point of contact within Leadhunter

Due to the limited extent of the personal data stored and the fact that Leadhunter does not focus on profiling, selling databases and/or targeting consumers, no separate Data Processing Officer (DPO) has been appointed. Any questions should be put to the director of Coöperatie Leadhunter U.A.: Mr A.M. Brouwer (telephone: 088-0039888, mail: anton@leadhunter.nl, postal address: Goese Dieplaan 97, 4463LA Goes).

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