

## 1 Who are we?

This is the Privacy Policy of People Insights BVBA, with registered office at Boslaan 35, 3080 Tervuren, Belgium and registered in the Crossroads Bank of Enterprises under the company number BE 0891.084.659.

In the context of our activities (executive coaching for leadership, team coaching and other HR related activities plus educational activities/teaching) we collect, hold, disclose and/or otherwise process personal data. Pursuant to the applicable data protection and privacy legislation, we qualify as the controller with respect to the personal data that we process.

## 2 What is the importance of this Privacy Policy?

We value your right to privacy and strive to protect your personal data in accordance with applicable data protection legislation and more specifically with the General Data Protection Regulation ("GDPR") and its national implementing legislation.

In this Privacy Policy we set forth how we collect your personal data, how and for which purposes we may use your personal data and to whom your personal data may be disclosed by us.

Further, this Privacy Policy includes important information regarding your rights with respect to the processing of your personal data. Therefore, we encourage you to read this Privacy Policy carefully.

From time to time, we may need to change this Privacy Policy. In such a case, we will send you an email with the link to the new version on our website. The most recent version of this Privacy Policy is available on our website(s): [www.peopleinsights.eu](http://www.peopleinsights.eu).

**Attention:** By sharing your personal data with us, we expect that you read this Privacy Policy carefully.

## 3 **Note:** This does not mean that we need your 'consent' to the processing of your personal data. We do not process your personal data on the basis of your consent, unless specifically indicated (e.g. for sending of our electronic newsletter). Whose personal data do we collect?

In the context of our services (as described above), we may process personal data of contact persons at our clients or other commercial partners, suppliers/service providers, of visitors or participants to a congress or another event (including speakers), students at Universities/Business Schools, and of visitors of our website.

#### 4 How do we collect personal data relating to you?

We may collect information about you in various ways::

- ✓ directly from you when you provide us with your personal data (as a coachee or client in other activities or student) during a coaching session/meeting/telephone/virtual or another event organised by us or by a third party;
- ✓ directly from you in the context of contractual negotiations or the conclusion of an agreement;
- ✓ via our professional clients, when they make first contact for an assignment, during the assignment and & follow up after and also when they organize a coaching session or other workshop/meeting for you;
- ✓ directly from you when you register on our website(s), when you navigate our website(s), when you complete a contact form on our website(s) or when you register for our electronic newsletter;
- ✓ via students and Universities/Business schools during the whole teaching process from start to end and follow up, and also via the University/Business Schools' internal IT system (e.g. Moodle);
- ✓ or
- ✓ via third parties and official sources (such as Universities/Business schools, IT systems, social media (e.g. Linked In), internet, ...)

#### 5 What personal data do we collect?

We may collect the following personal data about you:

<b>Identification and contact information</b>	Personal identification data: name, address, telephone number, mobile number, email address
<b>Financial information</b>	Identification data and bank account numbers (esp. clients & service providers)
	Financial transactions: amounts that you have to pay and have paid, overview of the payments, etc.
<b>Personal characteristics</b>	Personal characteristics: sex, birth date, nationality, language preference
<b>Profession and employment</b>	Profession and employment (individual or company, where appropriate VAT number)
<b>Other categories of data</b>	Organisation charts, photos, Individual Talent, Performance and potential assessment data (e.g. 360 degrees,..), Governance, Bios/cvs, data collection on opinions/thoughts during calls/meetings,...

Anytime certain information is mandatory and other information is optional, this shall be clearly indicated.

## 6 For what purposes do we use your personal data?

We use this personal data for the following purposes::

- ✓ to prepare, perform and report on coaching sessions and other HR related activities' reports
- ✓ for customer management,
- ✓ for the management of our website(s),
- ✓ for the organisation of events, including workshops, education, holiday greetings email, email distribution lists
- ✓ to comply with legal obligations

For your full information, you can find hereinafter the legal grounds used for these processing activities:

- ✓ for the processing of your personal data for the *delivery of the - services*, we rely upon the necessity for the **performance of a contract**,
- ✓ in all other cases, the processing of your personal data is based on the necessity for the purposes of the **legitimate interests as a company** (i.e. the interest of making contacts with prospects and possible clients),

## 7 With whom do we share your personal data?

- ✓ **With our service providers ('processors'):**

In the context of our activities as described above, we may share your personal data with third parties, in particular with service providers (such as IT/cloud service providers, website provider, Admin. Provider, Universities/Business schools) that act as our 'processors'.

- ✓ **With government authorities:**

Further, we may share your personal data with the government, police authorities or the judiciary in case we have a legal obligation to do so, e.g. for tax purposes.

We will implement appropriate safeguards when transferring your personal data to third parties. If necessary, we will for example conclude a processing agreement specifying the limitations to the use of your personal data and the obligations with respect to the security of your personal data.

Your personal data and your profile will not be lent or sold to third parties for marketing purposes without your prior explicit consent.

## 8 How long do we store your personal data?

Your personal data will not be stored for longer than is necessary in relation to the purposes for which we process them (as listed above). Afterwards it is still possible that they can be found in our back-ups or archives, but they will no longer be actively processed in a file.

More specifically, the following storage periods apply:

- All data relating to services, in particular coaching sessions will be stored for a period of 7 years after the end of the session.

- Contact information for clients and coachees will be stored for a period of 5 years after the last written communication with the client/coachees.

Only where we are legally obliged to, or where this is necessary for defending our interests in the context of judicial proceedings (e.g. in case of a dispute), we will store the personal data for longer periods.

## **9 How do we protect your personal data?**

We will implement the necessary administrative, technical and organisational measures for ensuring a level of security appropriate to the specific risks that we have identified.

We protect your personal data against destruction, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed.

Further, we seek to ensure that we keep your personal data accurate and up to date. In view thereof, we kindly request you to inform us of any changes to your personal data (such as a change in your contact details).

More information on our protection measures is available upon simple request.

## **10 What are your rights and how can you exercise them?**

You have (under certain conditions) the right to:

- ✓ information about and access to your personal data;
- ✓ rectify your personal data;
- ✓ erasure of your personal data ('right to be forgotten');
- ✓ restriction of processing of your personal data;
- ✓ object to the processing of your personal data;
- ✓ receive a copy of your personal data

To read more about these rights, and circumstances under which you can use these rights, see the Annex to this document. In principle you may exercise these rights free of charge. Only where requests are manifestly unfounded or excessive we may charge a reasonable fee.

We aim to respond as quickly as possible to your requests or questions. We might request a proof of identity in advance in order to double-check your request.

Finally, you have the right to lodge a complaint with the Belgian Privacy Commission / Data Protection Authority relating to the processing of your personal data by us.

## **11 Contact**

If you have any questions, comments or complaints in relation to this Privacy Policy or the processing of your personal data by us, please feel free to contact us by e-mail at the attention of Sunita Malhotra, Managing Director People Insights BVBA- via [sunita@peopleinsights.eu](mailto:sunita@peopleinsights.eu).

## Annex – More information about your rights as a data subject

**Right to information and right to access your personal data** You may at any time request more information on our processing activities and the personal data that we are keeping from you.

**Right to rectification of inaccurate or incomplete personal data of** You have the right to require us to, without undue delay, rectify or complete any of your personal data that is inaccurate or incomplete.

**Right to deletion of your personal data ('right to be forgotten')** You may request us to delete (part of) your personal data in the following situations:

- when the processing is no longer necessary for achieving the purposes for which they we collected or otherwise processed these; or
- when the processing was based on your consent and you have decided to withdraw that consent;
- when you have other reasonable grounds to object to the processing of your personal data;
- when we would unlawfully process your personal data;
- when your personal data have to be erased in compliance with a legal obligation directed to us.

We note that in some case, we may refuse to delete your personal data: (i) for exercising the right of freedom of expression and information; (ii) for compliance with a legal obligation; or (iii) for the establishment, exercise or defence of legal claims.

**Right to restriction of processing** You may request us to (temporarily) restrict the processing of your personal data in the following situations:

- when you have contested the accuracy of your personal data, for a period enabling us to verify this accuracy; or
- when the processing appears to be unlawful and you request us the restriction of use of your data instead of the deletion of this data; or
- when we no longer need the personal data for the purposes of the processing, but you need them for the establishment, exercise or defence of legal claims; or
- pending verification whether our legitimate grounds override yours in the framework of an objection.

**Right to object to the processing of your personal data (free of charge)** You may under certain circumstances object to the processing of your personal data, when such processing is based on our “legitimate interests”. If we agree, we will no longer process your personal data, unless we have compelling legitimate grounds to do so, or because such a processing is necessary.