

# Privacy Policy for VONQ.com and VONQ.com/nl

Updated: 28 May 2019

## 1 Introduction

- 1.1 This Privacy Policy (“**Policy**”) is used by VONQ B.V. (“**VONQ**”, “**we**”, “**us**”, “**our**”), a company with limited liability under the laws of the Netherlands, having its registered office in Rotterdam, the Netherlands, and its principal place of business at Westblaak 175, (3012 KJ) Rotterdam, the Netherlands and registered at the Chamber of Commerce under registration number 24402216. VONQ can be reached by emailing us at [hello@vonq.com](mailto:hello@vonq.com).
- 1.2 VONQ values the rights that have been admitted to natural persons such as you within especially the General Data Protection Regulation (“**GDPR**”), German Federal Data Protection Act (“**BDSG**”) and German Telemedia Act (“**TMG**”), the Privacy and Electronic Communications Regulations (“**PECR**”), and the Dutch Data Protection Act (“**DDPA**”), and therefore would like to inform you about the processing of data by VONQ. This Policy applies to all processing of data that identifies you or may be used by VONQ to identify you with (“**Personal Data**”) as performed in the course of our services for you, providing [www.vonq.com](http://www.vonq.com) and/or [www.vonq.com/nl](http://www.vonq.com/nl) (“**Website**”) to you and allowing your use thereof (“**Services**”). In cases Personal Data are processed by our platform “Job Marketing Platform”, we kindly refer you to the responding Privacy Policy on: <https://www.vonq.com/privacy-policy/>
- 1.3 When visiting the Website, VONQ processes Personal Data in relation to you as a visitor of the Website for which we have determined the purpose and means of processing and for which we are the ‘data controller’ pursuant to the GDPR.
- 1.4 We may amend this Policy at any time. In case the Policy is amended, this amended Policy will be made available to you through the Website.

## 2 Processing of Personal Data

- 2.1 VONQ is processing your Personal Data because you are visiting the Website. On the Website, you may perform activities such as but not limited to filling out contact forms. Where you provide Personal Data to us in the course of those activities, we will process such Personal Data as well.
- 2.2 While pseudonymous usage profiles may be created for advertising, market research, and site design purposes, VONQ does not perform any automated decision making based on this profile, including profiling as referred to in article 22(1) and (4) GDPR.
- 2.3 From visitors to the Website, we collect and process Personal Data where you would engage in activities on the Website or request anything from VONQ:
  - 2.3.1 If you visit our Website for purely informational purposes we will only process those of your Personal Data which are automatically transmitted to us by your Internet browser (“**Log Data**”): IP address; Browser type and browser version; Used operating system; Referrer URL; Hostname of the accessing device; Date and time of the request; amount of data sent. VONQ uses the Log Data only for statistical evaluations for the purpose of operation, security and optimisation of the Website. These Log Data cannot be assigned to specific persons and will not be merged with other data sources. VONQ reserves the right to subsequently check this Log Data if concrete indications of illegal use become known.
  - 2.3.2 Only when you intend to use Services offered via our Website it can be necessary that you have to enter further Personal Data. Here it merely concerns such, which are necessary for the processing of the respectively used Service. We will process all the information you choose to provide to us via the available forms, such as but

not limited to your name, company, further contact details and comments or questions.

- 2.4 The above-stated information is not mandatory and not necessary to enter into an agreement with us. Should you choose not to provide this information, we may not be able to offer you the Website as intended. We collect this Personal Data by asking you to provide us with them.
- 2.5 Apart from the above-stated list, we collect and process Personal Data such as your IP address, as collected via cookies and similar techniques (please be referred to article 5) automatically. This is not mandatory and not necessary to enter into an agreement with us. Should you choose not to provide this information, we may not be able to offer you the Website as intended.
- 2.6 VONQ anonymises parts of the Personal Data, which means we transform the Personal Data into data that can no longer be attributed to a natural person. We call this data 'Non-Personal Data'. VONQ hereby reserves the right to store Non-Personal Data for the purposes as referred to in the Policy, in specific article 3, and as long as we find to be necessary.

### **3 Purposes of processing Personal Data and legal basis thereof**

- 3.1 Personal Data is collected and processed by VONQ for the following purposes:
  - 3.1.1 Providing the Website and Services to you;
  - 3.1.2 Analysing the effectiveness of the Services and Website;
  - 3.1.3 Allowing you to contact VONQ and allowing VONQ to respond to your request;
  - 3.1.4 Analysing the use of the Services and Website;
  - 3.1.5 Analysing Personal Data to improve the Services and Website;
  - 3.1.6 Promoting the use of our Services and Website;
  - 3.1.7 Improving the Services and Website.
- 3.2 VONQ processes Personal Data on the following legal basis:
  - 3.2.1 You have given consent to the processing of your personal data for one or more specific purposes;
  - 3.2.2 VONQ's legitimate interest to maintain and monitor the performance of the Website and to constantly look to improve the site and the Services it offers to our users;
  - 3.2.3 VONQ's processing is necessary for the performance of a contract with you or the steps prior to entering into a contract with you.

### **4 Retention times**

- 4.1 We store your Personal Data as long as necessary to perform the purposes of processing as stated in the Policy. In addition, the following specific retention times apply.
- 4.2 IP addresses are anonymised immediately, with an encrypted transferred copy of the IP addresses kept for a week, for backup purposes. Other action may require us to keep your data for longer, for example when you download our content, such as a whitepaper or contact us through the Website.
- 4.3 If you apply to our jobs, we use the services and products of SmartRecruiters Inc. We kindly refer you to their [privacy policy](#).

### **5 Cookies and Google Analytics**

- 5.1 As stated above, VONQ collects Personal Data automatically via cookies and similar techniques. These are small data files placed and stored on your internet browser on your computer to serve as an identifier, to navigate through the Website, and to enable certain

features of the Website. These do not damage your computer and contain no harmful software.

5.2 Our Cookie Policy may be read at: <https://www.vonq.com/privacy-policy/>

## **6 E-mail**

6.1 You may provide your email address to VONQ via the Website. This data is used with your consent to contact you in the most optimal way and to perform the activities you have requested. For example, to inform you about tips on the latest job marketing developments.

6.2 Further to the above-stated e-mails, VONQ may contact you to further promote VONQ and its brands, products, and services. Where necessary, we will obtain your consent prior to sending these emails. Every e-mail offers you the possibility to withdraw consent and opt-out of emails from VONQ.

## **7 Recipients of Personal Data**

7.1 When such is necessary to perform our Services to you and the company you are applying to, we may transfer Personal Data to our processors. Processors shall always act and process Personal Data on behalf of VONQ and the instructions we provide them with. These may include:

7.1.1 Cookie Consent for our cookie popup (UK based);

7.1.2 Facebook tracking code (US based company, part of EU-US [Privacy Shield](#));

7.1.3 LinkedIn tracking code (US based company, part of EU-US [Privacy Shield](#));

7.1.4 Hotjar tracking code (Malta based);

7.1.5 Intercom for the Website chat function (US based company, part of EU-US [Privacy Shield](#));

7.1.6 Pardot, part of Salesforce, for marketing (US based company, part of EU-US [Privacy Shield](#)).

7.1.7 Prolocation Server hosting provider (Dutch company);

7.1.8 Google for retargeting (US based company, part of EU-U.S. [Privacy Shield](#));

7.2 When such is necessary to perform the Services, we will provide the Personal Data to affiliated companies of VONQ. These companies are:

7.2.1 VONQ GmbH, Georg-Glock-Straße 8, 40474 Düsseldorf, Germany.

7.2.2 VONQ UK Ltd., 1 Burwood Place, London W2 2UT, United Kingdom.

## **8 Security**

8.1 VONQ ensures that it has taken all measures as stated in article 32 GDPR, meaning that, considering the state of the art, the costs of implementation and the nature, scope, context and purposes of Processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, VONQ has implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including, among others, as appropriate:

8.1.1 the pseudonymisation and encryption of personal data;

8.1.2 the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;

8.1.3 the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;

8.1.4 a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

8.2 Should any Personal Data breach occur and result in a high risk to your rights and freedoms, we will communicate this to you without undue delay.

## **9 Your rights**

- 9.1 The GDPR provides data subjects, depending on the situation, with the following rights:
- 9.1.1 The right to access Personal Data;
  - 9.1.2 The right to rectification of Personal Data;
  - 9.1.3 The right to request from VONQ the erasure of Personal Data;
  - 9.1.4 The right to request VONQ whether the processing of the Personal Data may be restricted;
  - 9.1.5 The right to object to processing;
  - 9.1.6 The right to data portability;
  - 9.1.7 Where the processing is based on consent: the right to withdraw such consent at any time, without such withdrawal having an effect on the legitimacy of the processing prior to withdrawal;
  - 9.1.8 The right to lodge a complaint at a supervisory authority.
- 9.2 When performing these rights, VONQ may request specific additional information. Such additional information will only be processed for the purpose of performing the rights mentioned.

## **10 Children rights**

- 10.1 Our Website and Services do not address anyone under the age of 16 ("**Children**").
- 10.2 We do not knowingly collect personally identifiable information from Children. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from Children without verification of parental consent, we take steps to remove that information from our servers.

## **11 Questions**

- 11.1 Should you have any questions after reading the Policy, or would like to exercise any right as stated in the Policy, please do not hesitate to contact us with the details provided to you in the Policy or email us and our data protection officer at [legal@vong.com](mailto:legal@vong.com).