

Protecting your privacy is of great importance to us. We created this Privacy Statement to demonstrate our commitment to your right to data protection, privacy and to outline how your Personal Data is processed.

1. Controller of your Personal Data

1.1. Personal Data

Personal Data is any information which is related to an identified or identifiable natural person. This includes but is not limited to names, email addresses, phone numbers, job functions and employer details/institutional affiliations, gender and nationality, dietary, medical requirements or recruitment Information.

1.2. Controller

The Controller of Personal Data, alone or when joined with others, determines the purposes of any Personal Data and the means of processing it. VONQ B.V. (hereinafter: "VONQ", "we", "us", "our") is the operator of this website and applications (hereinafter: "Online Service") and the Controller in the meaning of the General Data Protection Regulation (hereinafter: "GDPR") for the processing activities described in this Privacy Statement.

During our business relationship with you, VONQ may share contact information with affiliated VONQ companies. These affiliated companies and VONQ are jointly responsible for the protection of your Personal Data (article 26 GDPR). To establish a central point of contact in the context of this joint controllership, VONQ entered into an agreement with these affiliated companies granting you the right to centrally exercise your rights as a data subject under section 6 of this Privacy Statement.

To exercise your rights, you may reach out to our Data Protection Team via dpo@vonq.com. Please consult section 6 to learn more about your rights.

2. Processing of Personal Data when using VONQs Online Services

2.1. Categories of Personal Data

When using our website or applications (hereinafter: "Online Services"), we process information that you have voluntarily provided about yourself or that was generated by us by the use of our Online Services; it comprises the following categories of Personal Data:



- Contact information, such as first and last name, company, e-mail address, address, or phone number.
- Other types of Personal Data provided as part of a support issue or the sign-up to any other type of call-to-action forms and
- Information on your interaction with the Online Service, including your IP address, browser type and version, operating system, referrer, hostname of the accessing device; timestamp of the request, the amount of data sent of each request.

2.2. Purpose of processing

Your Personal Data is being processed for the following purposes:

- Providing the Online Services to you;
- Analysing the effectiveness of the Online Services;
- Improvement and further development, securing, updating, and troubleshooting of the Online Services;
- Verification of your identity and responding to requests;
- Billing the use of the Online Services;
- Providing offers and order processing;
- Contacting you with information about our products and services, providing further marketing information or, as outlined in section 4, in the context of customer satisfaction surveys; and
- Prevention of illicit activities, fraud, attacks towards our infrastructure and IT systems, enforcing our Online Service's terms and to preserve legal claims.

2.3. Online Services provided by your organization

VONQs Online Services may be provided to you by another company as part of an employment, contract, or similar relationship, for example by our enterprise customers. In this case, if our Online Services are provided by another company, there is a data processing agreement defining the relationship between VONQ and your company. According to this agreement, your company is the controller of your Personal Data. Please refer to your company regarding the processing of your Personal Data.

2.4. Cookies

Interacting with our Online Services should be as convenient as possible for you. To enable this we may use cookies and similar technologies. Cookies are small files temporarily stored on the hard disk of your device by your browser. Such a file often includes a unique identifier, i.e. a randomly generated number. While some cookies



expire at the end of your session; others may remain on your device for a longer period of time. If cookies are stored automatically, without your consent, these cookies are technically necessary to provide our Online Services. Other cookies (or similar technologies) will only be applied based on your prior consent.

2.5. External Links

This Privacy Statement only applies to Online Services that link to this Privacy Statement. It does not apply to third-party websites or if VONQ only processes information as a processor on behalf of a controller.

VONQ's websites contain links or references to other third-party websites we do not control and to which our Privacy Statement does not apply. We are not responsible for the content of third-party websites nor their privacy practices.

3. **Processing of Personal Data in the context of your business relationship with VONQ**

3.1. Categories of Personal Data

In a business relationship with us, VONQ may process the following categories of Personal Data of employees, contact persons and vicarious agents at (prospective) customers, suppliers or vendors (hereinafter: "Customers"):

- Contact information, such as first and last name, name of the company you work for, your job title, the country you or your job are in, your email address and your phone number;
- Project related information in, but not limited to, Recruitment Marketing Campaigns, necessarily processed in a project or contractual relationship with us or voluntarily provided by the Customer, such as Personal Data relating to orders, payments, requests, issues, and project specification, planning and development;
- Payment information, such as data necessary for processing payments, fraud prevention and, if mandatory by law, Customer compliance evaluations.

3.2. Purpose of processing

- Administrating and developing business relationships with Customers, including the exchange of information about Online Services, Recruitment Marketing Campaigns and projects in general by, for example, inquiries or requests or providing you with information about services purchased;
- Planning, performing and managing business relationships with Customers by performing orders and transactions, maintaining an up-to-date job board portfolio,



processing payments, accounting, auditing, billing and providing support in the aforementioned areas;

- Market evaluation and analysis, organizing events and other Customer focused activities;
- Ensuring the confidentiality, integrity, availability and resilience of our Online Services, as well as the detection and prevention of security threats, fraud or other illicit or malicious activities;
- Compliance with legal frameworks, best business practices and internal policies.
- Dispute resolution, enforcement of contractual agreements and any actions related to legal claims.
- Contacting you to exchange further information and offers regarding our Online Services, providing further marketing material and conducting customer satisfaction surveys as outlined in the following section 5.

4. **Processing of Personal Data in the context of VONQ KoPilot**

4.1. Categories of Personal Data

In the context of KoPilot, VONQ may process the following categories of Personal Data of potential candidates (hereinafter: "Candidate"):

- Contact information such as salutation, name, email address, and phone number.
- Professional information such as resume/CV content, including education, experience, skills, and certifications. AI chat and interview information such as answers to AI bot questions and interview transcript.
- Match Score Data: compatibility score generated through automated analysis comparing your profile with the job description.

VONQ collects the above mentioned categories of personal data directly from you as a candidate on our proprietary KoPilot Candidate journey platform when you submit your resume/CV, when you chat with our AI agent and when you engage in conversation with our AI agent in the initial interview.

4.2. Purpose of Processing

VONQ collects this Personal Data for the purpose of facilitating recruitment activities for our clients.

5. **Processing of Personal Data in the context of direct marketing and surveys**

We may process your contact information for direct marketing purposes (e.g. product updates, newsletters, invitations or similar) and for customer satisfaction surveys, You may, of course, opt-out of the processing of your contact data for these purposes at any time by



contacting our Data Protection Team via dpo@vonq.com or by using the opt-out mechanism provided in the respective communication.

6. Transfer of Personal Data

Your Personal Data may be transferred to:

- third-party IT service providers, such as hosting providers, cloud software providers or, but not limited to, text processors;
- third-party compliance providers, such as suppliers helping us with tax or legal obligations, financial compliance, also regulatory bodies, law enforcement, government authorities, or attorneys and consultants and;
- third-party suppliers and sales partners.

Those third-party recipients of your Personal Data may be located outside of your country of residence.

7. Your Rights

You may be entitled to specific rights pertaining your Personal Data, depending on the data protection laws in the jurisdiction in which you reside. In particular, illustrated using the example of the GDPR, you may be entitled to:

- Withdraw consent at any time with effect for the future (article 7 subs. 3 GDPR);
- Obtain information on the purposes of the processing, the categories of personal data concerned, the recipients of the data and the envisaged storage period (article 15 GDPR);
- Request that incorrect or incomplete Personal Data be rectified or supplemented (article 16 GDPR);
- Request the erasure of data – especially if the data is no longer necessary in relation to the purposes for which it was collected or is unlawfully processed, or you withdrew your consent according to the above (article 17 GDPR);
- Demand, under certain circumstances, the restriction of processing Personal Data (article 18 GDPR);
- The right to data portability, receiving your Personal Data in a commonly used, open and machine-readable format (article 20 GDPR);
- Object to the processing of data on the grounds of legitimate interests, for reasons relating to your particular situation (article 21 sec. 1 GDPR).

8. Security

VONQ implemented appropriate technical and organizational measures to protect your Personal Data from loss, misuse, and unauthorized access, disclosure, alteration, or



destruction and to ensure the confidentiality, integrity, availability and resilience of our systems.

9. Retention Period

VONQ will only retain your Personal Data for as long as it is required, unless indicated otherwise at the time of the collection of your Personal Data. If required by mandatory law (commercial or tax law) VONQ will erase your Personal Data once the retention of that Personal Data is no longer necessary for the purposes for which it was collected.

10. Contact

In case of comments, concerns or questions regarding your Personal Data or your wish to exercise your rights, please contact our Data Protection Team via: dpo@vonq.com.

11. Legal basis of processing

In case your Personal Data is processed by one of our companies located in the European Economic Area (hereinafter: "EEA") the following applies:

11.1. Legal basis of processing

The legal basis for processing your Personal Data is that such processing is necessary for:

- the **performance of the contract** with you or in order to take steps at your request prior to entering into a contract (article 6 sec. 1 lit b GDPR);
- compliance with a **legal obligation** to which we are subject to (article 6 sec. 1 lit. c GDPR); and/or
- the purposes of **legitimate interest** pursued by us (article 6 sec. 1 lit. f GDPR).
- In other cases, you have given your **consent** to the processing of your Personal Data (article 6 sec. 1 lit. a GDPR).

11.2. Purpose and legal basis of processing Personal Data when using VONQs Online Services

Providing the Online Services to you; analysing their effectiveness, improvement and further development, securing, updating and troubleshooting of the Online Services:

- Performance of the contract, article 6 sec. 1 lit. b GDPR,
- Legitimate interest, article 6 sec. 1 lit. f GDPR.

Identity verification

- Performance of the contract, article 6 sec. 1 lit. b GDPR,
- Legitimate interest, article 6 sec. 1 lit. f GDPR.



Billing your use of the Online Services;

- Performance of the contract, article 6 sec. 1 lit. b GDPR,
- Legitimate interest, article 6 sec. 1 lit. f GDPR.

Providing offers and processing your order;

- Performance of the contract, article 6 sec. 1 lit. b GDPR,
- Legitimate interest, article 6 sec. 1 lit. f GDPR.

Contacting you product information and services, providing further marketing information or, as outlined in section 4, in the context of customer satisfaction surveys;

- Consent, article 6 sec. 1 lit. a GDPR,
- Legitimate interest, article 6 sec. 1 lit. f GDPR.

Prevention of illicit activities, fraud, attacks towards our infrastructure and IT systems, enforcing our Online Service's terms and to preserve legal claims.

- Legal obligation, article 6 sec. 1 lit. a GDPR,
- Legitimate interest, article 6 sec. 1 lit. f GDPR.

11.3. Purpose and legal basis of processing Personal Data in the context of your business relationship with VONQ

Administrating and developing business relationships with Customers, including the exchange of information about Online Services, Recruitment Marketing Campaigns and projects in general by, for example, inquiries or requests or providing you with information about services purchased;

- Performance of the contract, article 6 sec. 1 lit. b GDPR,
- Legitimate interest, article 6 sec. 1 lit. f GDPR.

Planning, performing and managing business relationships with Customers by performing orders and transactions, maintaining an up-to-date job board portfolio, processing payments, accounting, auditing, billing and providing support in the aforementioned areas;

- Performance of the contract, article 6 sec. 1 lit. b GDPR,
- Legal obligation, article 6 sec. 1 lit. a GDPR.

Market evaluation and market analysis, organizing events and other Customer focused activities;

- Consent, article 6 sec. 1 lit. a GDPR,
- Legitimate interest, article 6 sec. 1 lit. f GDPR.

Ensuring the confidentiality, integrity, availability and resilience of our Online Services, as well as the detection and prevention of security threats, fraud or other illicit or malicious activities;

- Legitimate interest, article 6 sec. 1 lit. f GDPR.

Compliance with legal frameworks, best business practices and internal policies.

Dispute resolution, enforcement of contractual agreements and any actions related to legal claims.

- Legal obligation, article 6 sec. 1 lit. a GDPR,



- Legitimate interest, article 6 sec. 1 lit. f GDPR.

Information exchange and offers concerning our Online Services, providing further marketing material and conducting customer satisfaction surveys, as outlined in section 5:

- Consent, article 6 sec. 1 lit. a GDPR,
- Legitimate interest, article 6 sec. 1 lit. f GDPR.

11.4. Purpose and legal basis of processing Personal Data in the context of VONQ KoPilot, as outlined in section 4:

- Consent, article 6 sec. 1 lit. a GDPR.

12. International Data Transfers

If we transfer your Personal Data to third countries outside the EEA, we ensure that your data is safeguarded by appropriate data protection controls, for example by so-called Standard Contractual Clauses (hereinafter: "SCCs"). Pre-approved by the European Commission, SCCs are consistent with the GDPR.

13. Region Specific Provisions

13.1. Do Not Track

The "Do Not Track" browser feature is currently not honored by our Online Services.

13.2. Usage by Children

VONQ's website and Online Services are not directed to minors, we do not knowingly process Personal Data of children under the age of 13. If you, as parent or legal guardian, believe that VONQ processed your child's Personal Data, please contact our Data Protection Team via dpo@vonq.com. We will initiate the appropriate steps to remove the information as soon as possible.

