

**YOUR PRIVACY IS IMPORTANT TO AMBITIOUS PEOPLE GROUP. BY MEANS OF THIS PRIVACY STATEMENT, AMBITIOUS PEOPLE GROUP WISHES TO INFORM YOU OF ITS PRACTICES WITH RESPECT TO THE COLLECTION AND USE OF YOUR PERSONAL INFORMATION (“PERSONAL DATA”).**

## **WHO IS YOUR DATA CONTROLLER?**

Ambitious People Group works with five (5) brands, that each focus on a specific segment of the recruitment sector (the “**Brands**”):

- LMH
- SAM
- Four Life Sciences
- Ardekay
- Five Finance

Each Brand encompasses several legal entities, incorporated under various jurisdictions. For your convenience, whenever we refer to one of these Brands in our Privacy Statement, we mean all legal entities that form that Brand.

The parent company of the Brands is Ambitious People Group B.V., a private company with limited liability incorporated under the laws of the Netherlands, having its registered seat in Amsterdam and its office in (1072 SB) Amsterdam at Jozef Israëlskade 48 E, the Netherlands, registered with the commercial register of the Dutch Chamber of Commerce under number 34278390.

Why and how your Personal Data is processed, is ultimately determined by Ambitious People Group B.V. Therefore, we consider Ambitious People Group B.V. to be the sole data controller with respect to your Personal Data. For the remainder of this Privacy Statement, we will refer to the Ambitious People Group B.V. as “**APG**”.

If you have any questions regarding this Privacy Statement, or if you wish to exercise any rights under this Privacy Statement, you can contact APG by e-mail at [privacy@ardekay.com](mailto:privacy@ardekay.com) or by phone at +31205708127.

## **TO WHOM DOES THIS PRIVACY STATEMENT APPLY?**

This Privacy Statement applies to everyone for whom APG processes Personal Data, for example:

- visitors of our website;
- APG's clients (and their employees);
- APG's candidates and prospects;
- recipients of APG newsletters and other mailings;
- APG's suppliers (and their employees).

## **WHEN DOES APG COLLECT YOUR PERSONAL DATA?**

APG may collect your Personal Data:

- when you register online with APG or one of its Brands;
- when you visit the website of APG or one of its Brands;
- when you subscribe to an online newsletter of APG or one of its Brands;

- when you contact APG or one of its Brands with regard to, for example, information requests, questions, comments or complaints;
- from job board partners;
- from referral partners, business directories and social media platforms such as LinkedIn.

## WHAT KIND OF PERSONAL DATA DOES APG COLLECT?

APG may collect the following Personal Data:

- A. Your (first, middle, last) names, (business/private) address, phone number, date of birth, e-mail address, gender;
- B. Your curriculum vitae and any other information relating to your professional or educational background, including but not limited to application history, interview history, placement history, industry, job category, assessments, hourly rate, type of contract (permanent/temporary);
- C. Your contact with APG – such as a note of a call between you and APG, a chat record when you engage in a chat session with APG, an email or letter you send to APG or other records of any contact you have with APG.

## ON WHAT LEGAL GROUNDS DOES APG PROCESS YOUR PERSONAL DATA?

To process your Personal Data as described above, APG relies on the following legal bases:

1. **Performance of a contract:** the use of your Personal Data is necessary to perform the contract that you have with us. For example, if you register with APG or one of its Brands to be approached for vacancies, APG will process all Personal Data provided by such registration.
2. **Legitimate interests:** the processing is necessary for the purposes of the legitimate interests pursued by us, namely for security reasons (e.g. system integrity and fraud detection), administrative and legal purposes. APG also wants to provide you with the best suitable content of the website, emails and newsletters, to improve and promote its products and services and the content on our website.
3. **Consent:** APG may rely on your consent to use your Personal Data for certain direct marketing purposes.

## WHY DOES APG PROCESS YOUR PERSONAL DATA?

APG processes your Personal Data for different purposes. Please find below the specific processing purposes, linked to the specific Personal Data that is collected in that respect (indicated by a letter corresponding with the section “**What Kind of Personal Data Does APG Collect?**”) and the specific legal ground(s) therefore (indicated by a number corresponding with the section “**On What Legal Grounds Does APG Process Your Personal Data?**”).

- Providing recruitment services to you: **A-C** and **1, 2**.
- Conducting market research, conducting retention and customer satisfaction surveys, conducting marketing activities (including through email newsletters, social media and onsite/offsite and online/offline advertisement), conducting sales activities (including analyzing your Personal Data and your use of APG services for making (personalized) offers and quotes Conducting legal processes, including (i) conducting legal proceedings, and (ii) collecting evidence for civil legal proceedings relating to you: **A-C** and **3**.

- Complying with statutory obligations, including (i) provision of data to authorized authorities in the context of criminal investigations, (ii) complying with (applicable) data retention obligations, (iii) the provision to third parties of information concerning customers in connection with an infringement of these third parties' rights; or (iv) complying with any request by you to exercise your rights under this Privacy Statement: **A-C** and **2**.

Each Brand uses aggregated information to analyze employment trends in various industries, for example the aggregate salary for certain job (categories). Such aggregated information cannot be used to identify an individual and, as such, does not qualify as personal data.

### **WITH WHOM CAN APG SHARE YOUR PERSONAL DATA?**

APG only shares your Personal Data to the extent (i) such is necessary for the provision of its services to you; or (ii) such is necessary to (legally) protect its legitimate interests in compliance with applicable law; or (iii) required by law.

APG shares your Personal Data with the Brands of APG in the following manner. To increase the chance of a match between you and a suitable job, APG has created Brands dedicated to specific sectors. Therefore, if you apply for a Brand, your Personal Data is stored in the database of that Brand. However, it is possible that vacancies available at other Brands provide an equally suitable or even better match with your profile. For that reason, the databases of each Brand are accessible to employees of other Brands. APG's employees are instructed to only source the databases of other Brands in case of 'cross Brand vacancies': vacancies that fit the profile of more than one Brand.

APG may also share your Personal Data with organizations that engaged APG or one of its Brands to fulfil vacancies on their behalf. APG will only share your Personal Data with organizations of which APG knows, or has received confirmation that, or may reasonably expect that such organization will only process your Personal Data in accordance with applicable law. Upon receipt of your Personal Data, that organization becomes (joint) data controller of your Personal Data, as such organization determines the purpose and means of its processing.

Furthermore, APG may share your Personal Data with other third parties, whom will process it on behalf of APG for the purposes stated above. Such third parties include, but are not limited to, IT service providers, survey service providers, data hosting providers and custodians. APG will not share your Personal Data with these third parties unless they have provided written assurances that the Personal Data shared will be protected in accordance with the provisions of this notice. Third parties will only be permitted to process your Personal Data for specified purposes and under our instructions.

In order for APG to provide its services, it may be necessary to transfer your Personal Data to a recipient in a country outside the European Economic Area. Where Personal Data is transferred out of the European Economic Area, and where this is to a Brand or vendor in a country that is not subject to an adequacy decision by the European Commission, Personal Data shall -in all cases- be adequately protected under appropriate safeguards such as European Commission approved

standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules. APG is happy to provide you with more detailed information upon request.

### **WHAT IS THE APG RETENTION POLICY?**

Our business is recruiting. If you found your job through APG at one point in your career, you may want to do so again at a later stage; even if you are not actively seeking a new job. Functioning as a career coach, APG considers it unpractical to delete your Personal Data from the database of a Brand after a given amount of time without you having asked us to do so. The next vacancy APG sends you may very well be your dream job! However, as removing your Personal Data from our database may not always be on the top of your mind, APG will periodically send you a reminder about your Personal Data and the option of it being removed. In any case, APG will remove your Personal Data from its database once you have reached the age of sixty-eight (68).

The Personal Data that is not included in our database, will be retained for as long as necessary to perform the purposes of processing as stated in this Privacy Statement. Each department within APG is familiar with the retention policies and shall periodically review the Personal Data to ensure that the applicable retention periods are complied with.

### **WHICH TECHNICAL AND ORGANISATIONAL SECURITY MEASURES ARE IN PLACE?**

In accordance with applicable data protection legislation, in particular the GDPR, APG observes adequate procedures to prevent loss or any form of unlawful processing of your Personal Data. APG uses appropriate business systems and procedures to protect and safeguard the Personal Data. APG also uses security procedures and technical and physical restrictions for accessing and using the Personal Data on our servers. Only authorized personnel are permitted to access Personal Data in the course of their work.

APG has implemented (at least) the following security measures across its organization:

- Office access with digital key only;
- Office doors and computers are locked when left unattended;
- IP restrictions;
- Firewall and malware detection;
- VirusScan's on all devices;
- Patch management for all services;
- Secured VPN connections;
- System administrators available 24/7;
- SSL certificates for all websites;
- Regular upgrades of software and server (speed);
- Strong password check;
- Double opt-in functions.

## **WHAT ARE YOUR RIGHTS?**

In accordance with applicable data protection legislation, you have several rights regarding your Personal Data and the processing thereof. You have the right to (ask us to) correct, supplement, delete or block your Personal Data for convenience, if it is incomplete, incorrect or is being processed in contravention of this Privacy Statement or any statutory provision. You also have the right to request APG to inform you of any Personal Data it holds relating to you. Furthermore, you have the right to receive your Personal Data, in a structured, commonly used and machine-readable format and have the right to transmit that Personal Data to another controller.

If you have any requests regarding your rights, or if you wish to exercise your rights, please contact APG using the contact details provided at the top of this Privacy Statement. Please note that under certain circumstances, APG's statutory obligations or legitimate interests may take precedence over your rights as described in this section. If this is the case, and if, as a result thereof, APG cannot (fully) comply with your request, APG will inform you thereof. Please also note that certain requests may affect our provision of services to you, your access thereto or may result in APG not being to provide you with services at all.

## **CONSENT AND WITHDRAWAL OF CONSENT**

You are entitled to withdraw your consent at any time by giving us written notice. Upon receipt of such a notice, APG will -without undue delay- stop processing your Personal Data to the extent possible by law. Please use the contact information provided at the top of this Privacy Statement to do so.

## **CHANGES TO THE PRIVACY STATEMENT**

APG reserves the right to amend the privacy statement and will post any revisions on its website. APG advises you to check this webpage regularly to see if any changes have been implemented.

This Privacy Statement was most recently changed on 25 May 2018.