

## PRIVACY STATEMENT

Last review date: 17/11/2023

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

This privacy statement applies to the following legal entities (hereinafter referred to as "We" or "Tentoo"):

- Tentoo Payroll Services nv (with registered office at Ikaroslaan 14, 1930 Zaventem (Belgium) and with company number 0462.803.529)
- Tentoo Partners vzw (with registered office at Ikaroslaan 14, 1930 Zaventem (Belgium) and with company number 0875.199.524)

Tentoo provides HR administration support for entrepreneurs and companies.

We act as data controller for personal data processed in the context of our business activities.

We make every effort to protect and process the personal data entrusted to us in an appropriate and transparent manner, in accordance with the applicable legislation and specifically in accordance with the General Data Protection Regulation 2016/679 of April 27, 2016 ("GDPR").

**Please follow the links below for additional information.** Where relevant, we have distinguished between different categories of data subjects:

## SCOPE OF THIS PRIVACY STATEMENT

### WHAT ARE OUR PURPOSES FOR PROCESSING YOUR PERSONAL DATA?

- I AM A VISITOR TO THE WEBSITE
- I AM A (POTENTIAL) FREELANCER WITHOUT SELF-EMPLOYED STATUS
- I AM (A CONTACT PERSON FROM) A USER COMPANY, SUPPLIER, BUSINESS CONTACT OR ANY OTHER PERSON WHOSE PERSONAL DATA IS PROCESSED

### WHAT ARE OUR LEGAL GROUNDS FOR PROCESSING YOUR PERSONAL DATA?

- I AM A VISITOR TO THE WEBSITE
- I AM A (POTENTIAL) FREELANCER WITHOUT SELF-EMPLOYED STATUS, (A CONTACT PERSON FROM) A USER COMPANY, SUPPLIER, BUSINESS CONTACT OR ANY OTHER PERSON WHOSE PERSONAL DATA IS PROCESSED

### WHAT ARE YOUR RIGHTS?

### HOW DO WE OBTAIN YOUR PERSONAL DATA?

- I AM A VISITOR TO THE WEBSITE
- I AM A (POTENTIAL) FREELANCER WITHOUT SELF-EMPLOYED STATUS, (A CONTACT PERSON FROM) A USER COMPANY, SUPPLIER, BUSINESS CONTACT OR ANY OTHER PERSON WHOSE PERSONAL DATA IS PROCESSED

### WHAT PERSONAL DATA DO WE COLLECT?

- I AM A VISITOR TO THE WEBSITE
- I AM A (POTENTIAL) FREELANCER WITHOUT SELF-EMPLOYED STATUS, (A CONTACT PERSON FROM) A USER COMPANY, SUPPLIER, BUSINESS CONTACT OR ANY OTHER PERSON WHOSE PERSONAL DATA IS PROCESSED

### WHO CAN WE TRANSFER YOUR PERSONAL DATA TO?

### IS YOUR PERSONAL DATA PROTECTED?

## HOW LONG IS YOUR PERSONAL DATA RETAINED?

- [I AM A VISITOR TO THE WEBSITE](#)
- [I AM A \(POTENTIAL\) FREELANCER WITHOUT SELF-EMPLOYED STATUS](#)
- [I AM \(A CONTACT PERSON FROM\) A USER COMPANY, SUPPLIER, BUSINESS CONTACT OR ANY OTHER PERSON WHOSE PERSONAL DATA IS PROCESSED](#)

## IS YOUR PERSONAL DATA USED FOR AUTOMATED DECISION-MAKING?

## HOW TO CONTACT TENTOO?

## CHANGES TO THIS PRIVACY STATEMENT

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### SCOPE OF THIS PRIVACY STATEMENT

The purpose of this Privacy Statement is to inform you about how and why we process your personal data as a data controller during the conduct of our business or when you use the Site and the forms and applications offered on it, to whom we transfer this information, your rights and who you can contact for more information about this.

When we refer to "the Site", we mean the web pages with URLs beginning with the following:  
<https://www.tentoo.be>.

The Site may contain links to other websites. Although we try only to provide links to websites that share our high standards of data protection, we are not responsible for the content of those websites or for their data protection policies. This Privacy Statement only relates to personal data collected by Tentoo.

Therefore, when you click on links on the Site, we strongly encourage you to read the Privacy Statement on the relevant websites before disclosing any personal data.

Please be aware that when you visit our pages on Facebook, Instagram, YouTube, and LinkedIn, whether you follow a shortcut on our website or not, cookies are processed by Facebook, Instagram, YouTube, and LinkedIn, respectively. These allow us to obtain more information - in a completely anonymised way - about the people who visit our pages on social media. For more information about why and how personal data is processed in that context, please refer to the Privacy Policy and Cookie Policy on these platforms' own websites:

- Facebook cookie policy: <https://www.facebook.com/policies/cookies/>
- Facebook privacy policy: <https://www.facebook.com/about/privacy/>

- Instagram cookie policy: <https://help.instagram.com/1896641480634370>
- Instagram privacy policy: <https://help.instagram.com/155833707900388>
- YouTube (Google) cookie policy: <https://policies.google.com/technologies/cookies?hl=en>
- YouTube (Google) privacy policy: <https://policies.google.com/privacy?hl=en>
- LinkedIn cookie policy: [https://www.linkedin.com/legal/cookie-policy?trk=homepage-basic\\_footer-cookie-policy](https://www.linkedin.com/legal/cookie-policy?trk=homepage-basic_footer-cookie-policy)
- LinkedIn privacy policy: [https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic\\_footer-privacy-policy](https://www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy)
- Calendly cookie policy:
- Calendly privacy policy: <https://calendly.com/privacy>

## **WHAT ARE OUR PURPOSES FOR PROCESSING YOUR PERSONAL DATA?**

### **I AM A VISITOR TO THE WEBSITE**

We only process your personal data for legitimate business purposes. These purposes include, but are not limited to:

- provision and proper organisation of our (online) services;
- handling questions, requests, and complaints (for example when these are sent via an online form);
- collecting statistics on the use of this Site ("web audience measuring");
- improving the performance and appearance of this Site.

### **I AM A (POTENTIAL) FREELANCER WITHOUT SELF-EMPLOYED STATUS**

We only process your personal data for legitimate business purposes and, in particular, for purposes linked to our legal status as an employer in the context of temporary employment. These purposes include, but are not limited to:

- managing the employment of temporary workers (personnel administration, processing and checking work done, payroll administration, etc.);
- compliance with legal obligations, particularly in the context of temporary employment;
- reporting occupational accidents;
- subscribing to (supplementary) insurance policies;
- customer management;
- providing information about our company, services and activities;
- proper organisation of our services;
- handling questions, requests and complaints;
- managing disputes;
- public relations;
- statistics and market research;
- security;
- logistics.

### **I AM (A CONTACT PERSON FROM) A USER COMPANY, SUPPLIER, BUSINESS CONTACT OR ANY OTHER PERSON WHOSE PERSONAL DATA IS PROCESSED**

We only process your personal data for legitimate business purposes. These purposes include, but are not limited to:

- customer and supplier management and management of other business contacts;
- invoicing and accounting;
- providing information about our company, services and activities;
- proper organisation of our services;
- handling questions, requests and complaints;
- managing disputes;
- public relations;
- statistics and market research;
- security;
- logistics;
- compliance with legal obligations.

## **WHAT ARE OUR LEGAL GROUNDS FOR PROCESSING YOUR PERSONAL DATA?**

### **I AM A VISITOR TO THE WEBSITE**

When you use online forms to contact us, your personal data is, in principle, processed for the protection of our legitimate interests (namely, our interest in handling your questions, requests and complaints in the best possible way).

In this regard, we will always determine on a case-by-case basis whether our interests outweigh your interests, fundamental rights, and freedoms. If you wish to receive more information about this, you can contact us at any time.

### **I AM A (POTENTIAL) FREELANCER WITHOUT SELF-EMPLOYED STATUS, (A CONTACT PERSON FROM) A USER COMPANY, SUPPLIER, BUSINESS CONTACT OR ANY OTHER PERSON WHOSE PERSONAL DATA IS PROCESSED.**

We only process your personal data for the purposes mentioned above:

- to conclude and perform agreements with you;
- to comply with our legal obligations;
- in the context of the legitimate interests of our company and/or a third party, such as (but not limited to) our business activities, customer management, supplier management, etc., and after balancing the relevant interests. If you wish to receive more information about this, you can contact us at any time.

When we are required by law to obtain your free, informed, specific, and unambiguous consent to process your personal data for certain purposes (for example, for direct marketing or market research activities), we will only process your data for these purposes after we have received such consent from you.

## **WHAT ARE YOUR RIGHTS?**

You have a number of rights regarding the personal data we process about you. In particular, you have the right to:

- access and receive a copy of your personal data insofar as this does not affect the rights of third parties, in particular the right of defence in court or the right to privacy;
- ask to update or correct your personal data if you believe it is inaccurate or incomplete;
- ask us to erase your personal data, or restrict the way we use it, if you believe that we do not have or no longer have legitimate grounds for processing it. However, these rights do not apply to the extent that the processing is necessary in the context of the establishment, exercise or defence of legal claims;
- withdraw your consent for the processing of your personal data (to the extent that the processing is based on your consent);
- receive your personal data in a structured, commonly used, and machine-readable form and transfer it to another party (to the extent that the processing is based on your consent or for performance of a contract);
- object to the processing of personal data in cases where a legitimate interest constitutes the grounds for processing; if you do this, we will stop the processing unless we have overriding and mandatory legitimate grounds for it or unless the processing is related to the establishment, exercise or defence of a legal claim.

In order to exercise the above rights, you may send us a request indicating which right you wish to exercise:

- by sending an e-mail to [privacy@tentoo.be](mailto:privacy@tentoo.be); or
- by sending a written request to Tentoo Payroll Services nv, Ikaroslaan 14, 1930 Zaventem (Belgium).

You can also use this contact information if you wish to make a complaint about the processing of your personal data.

If you are dissatisfied with the way we handle your personal data, you have the right to lodge a complaint with the Data Protection Authority (in Belgium: Drukpersstraat 35, 1000 Brussels, phone: +32 (0)2 274 48 00, e-mail: [contact@apd-gba.be](mailto:contact@apd-gba.be)).

## HOW DO WE OBTAIN YOUR PERSONAL DATA?

### I AM A VISITOR TO THE WEBSITE

We may obtain personal data about you when you use the Site and the applications offered on it. For example, this can happen when you contact us using the contact information on the Site and/or when you use our online forms/services.

The Site may also use cookies to collect statistics about visits to this Site in order to improve its performance and appearance. For more information about the cookies we use and how you can control them, please see our separate Cookie Policy which can be accessed via the following link: <https://www.tentoo.be/cookie-policy-eu/>.

### I AM A (POTENTIAL) FREELANCER WITHOUT SELF-EMPLOYED STATUS, (A CONTACT PERSON FROM) A USER COMPANY, SUPPLIER, BUSINESS CONTACT OR ANY OTHER PERSON WHOSE PERSONAL DATA IS PROCESSED

We may obtain personal data about you in the course of our activities.

We may obtain this personal data because you give it to us (for example, by contacting us, filling out our online forms, etc.), because others give it to us (for example, third-party service providers we use in the course of our business) or because it is accessible to the public.

When we obtain your personal data from other parties, we make reasonable efforts to conclude contractual provisions with these parties obliging them to comply with the relevant data protection rules. This may involve that party providing you with all necessary information or - where necessary - obtaining your consent for the processing of personal data as described in this Privacy Statement.

## WHAT PERSONAL DATA DO WE COLLECT?

### I AM A VISITOR TO THE WEBSITE

Most of the personal data we collect through the Site relates to the following specific services:

- **Contact form**

You can contact us via the Site if you have any questions or to make an appointment. We process the following data in this context: first and last name, e-mail address, telephone number and the content of your message.

- **Pay simulator**

The Site allows you to calculate a pay simulation. We process the following data in this context: e-mail address, name, telephone number, invoice amount excl. VAT (incl. or excl. expenses), gross hourly pay excl. expenses, number of hours per day, expenses per day, income tax (free percentage to be entered between 11.11% and 99%), status (student, white-collar employee, artist, blue-collar worker).

- **'Request a quote' form**

You can use the Site to contact us to request a quote. We process the following data in this context: first and last name, e-mail address, telephone number, company name, job title/activity, duration of the project, number of hours per day, any expenses, invoice amount (excluding VAT), gross pay, net pay.

- **Download webinar**

The Site allows you to download the webinar. We process the following data in this context: name, e-mail address, telephone number.

- **Registration form for My Tentoo platform**

The Site allows you to register as a freelancer or user company. We process the following data in this context: first and last name, e-mail address, username, and password.

## - **Newsletter subscription form**

You can contact us via the Site if you have any questions or to make an appointment. We process the following data in this context: e-mail address.

## - **Application form**

You can use the Site to contact us to apply for one of our vacancies. We process the following data in this context: first and last name, e-mail address, telephone number, curriculum vitae and the content of your message.

The Site may also use cookies to collect statistics about visits to the Site in order to improve its performance and appearance. For more information about the cookies we use and how you can control them, please see our separate Cookie Policy which can be accessed via the following link: <https://www.tentoo.be/cookie-policy-eu/>.

**I AM A (POTENTIAL) FREELANCER WITHOUT SELF-EMPLOYED STATUS, (A CONTACT PERSON FROM) A USER COMPANY, SUPPLIER, BUSINESS CONTACT OR ANY OTHER PERSON WHOSE PERSONAL DATA IS PROCESSED**

The personal data we collect may include:

- standard identification and contact information (for example: first and last name, address (private/work), e-mail address (private/work), telephone number (private/work));
- personal characteristics (for example: civil status, age, sex, date of birth, place of birth, nationality, language, household composition, etc.);
- financial data (for example: bank account number, professional income, etc.);
- employment and education information (for example: the organisation you work for, your job title, qualifications, professional experience, etc.);
- in the context of temporary employment, data relating to performance of the temporary employment contract (for example: status, job title, user company, employment type, time worked, absences, etc.);
- the information provided by you on forms and via all the services and communication channels we offer;
- data about the services you require;
- data about the way you use our services;
- data you give us when you express an interest in our services;
- data about the way you interact with us and other similar information.

## **WHO CAN WE TRANSFER YOUR PERSONAL DATA TO?**

Our employees will have access to your personal data on a strictly 'need-to-know' basis for the purposes described above.

We may disclose your personal data to third parties who reasonably need to access it for one or more of the purposes listed above (see the section "What are our purposes for processing your personal data?"). These may include the following third parties:

- external service providers that provide various business services for us;
- marketers;



- law enforcement and government agencies in accordance with the applicable legislation;
- external professional advisers (for example lawyers or consultants from Tentoo).

We will not transfer your personal data to recipients located in countries outside the European Economic Area (EEA) whose legislation does not offer the same level of data protection. An exception to this is if a freelancer without self-employed status is seconded to a user company in a country outside the EEA. In that case, appropriate safeguards are put in place to guarantee an adequate level of protection.

## **IS YOUR PERSONAL DATA PROTECTED?**

We use strict technical and organisational (security) measures to protect your personal data both online and offline from access by unauthorised persons, unlawful processing, misuse, damage, loss, and destruction.

These measures include:

- instructions and training for the employees involved to ensure that they are aware of our data protection obligations when they handle personal data;
- administrative and technical controls to limit access to personal data to what is necessary (for example through the use of passwords);
- technical security measures, including firewalls, antivirus software and encryption;
- physical security measures, such as security badges to gain access to our business premises.

Although we take appropriate security measures as soon as we receive your personal data, the transfer of data over the internet (including e-mail) is never completely secure. We make every effort to protect your personal data, but we can never fully guarantee the security of personal data sent to us or sent by us.

We limit access to your personal data to individuals who reasonably need it to do their work.

## **HOW LONG IS YOUR PERSONAL DATA RETAINED?**

### **I AM A VISITOR TO THE WEBSITE**

Your personal data will not be retained for any longer than is necessary for the purposes described above.

As a general rule, personal data obtained from forms on the Site is retained for five years.

However, depending on the specific situation, we may retain your personal data for longer than this. Specifically, we will do this if any of the following periods are longer: (i) the time required for the activity or service concerned; (ii) the retention period stipulated by law; or (iii) the statute of limitations within which legal proceedings can be initiated.

## **I AM A (POTENTIAL) FREELANCER WITHOUT SELF-EMPLOYED STATUS**

Your personal data will not be retained for any longer than is necessary for the purposes described above.

In principle, your personal data will be retained while you are employed as a temporary worker and for a period of five years following the end of your employment.

However, depending on the specific situation, we may retain your personal data for longer than this. Specifically, we will do this if any of the following periods are longer: (i) the time required for the activity or service concerned; (ii) the retention period stipulated by law; or (iii) the statute of limitations within which legal proceedings can be initiated.

## **I AM (A CONTACT PERSON FROM) A USER COMPANY, SUPPLIER, BUSINESS CONTACT OR ANY OTHER PERSON WHOSE PERSONAL DATA IS PROCESSED**

Your personal data will not be retained for any longer than is necessary for the purposes described above.

As a general rule, personal data processed in connection with the use of our services is retained for 10 years after the end of the contractual relationship.

However, depending on the specific situation, we may retain your personal data for longer than this. Specifically, we will do this if any of the following periods are longer: (i) the time required for the activity or service concerned; (ii) the retention period stipulated by law; or (iii) the statute of limitations within which legal proceedings can be initiated.

## **IS YOUR PERSONAL DATA USED FOR AUTOMATED DECISION-MAKING?**

Automated decisions are decisions about individuals that are based solely on the automated processing of personal data and that have legal effects that significantly impact the individuals concerned.

As a rule, we do not use personal data for automated decision-making. Therefore, we do not make decisions about you based solely on automated processing of your personal data.

## **HOW TO CONTACT TENTOO?**

If you have any questions about this Privacy Statement or about this Site in general, please contact us by:

- sending an e-mail to [privacy@tentoo.be](mailto:privacy@tentoo.be); or
- calling us on +32 (0)2 725 70 00;
- sending a written request to Tentoo Payroll Services nv, Ikaroslaan 14, 1930 Zaventem (Belgium).

## CHANGES TO THIS PRIVACY STATEMENT

We may update this Privacy Statement from time to time. Any changes we make to this Privacy Statement in the future will be posted on this page. To notify you when we last updated the Privacy Statement, we will update the revision date at the top of this page every time we make a change. The updated Privacy Statement will then be effective as of that date. Please check this page regularly to stay informed of any changes and additions.