

Privacy Statement

November 2023

Processing of your data

Refugee Talent Hub (RTH) records data from refugees who register with us, and from our partners and others interested in our activities. This includes personal data, such as names, (email) addresses and phone numbers. According to the General Data Processing Regulation (GDPR, or in Dutch: AVG), we are obliged to record the arrangements for processing personal data. For example, we must state what we do and don't do with the data, and what we expect from our partners. This document describes these agreements.

This statement was adopted on 3 July 2023 and applies to candidates and website visitors only.

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For whom is this policy intended?

This policy is intended for all individuals and organisations with whom we share personal data.

More specifically, this policy is written for:

- people with refugee backgrounds whose personal data we store and may share with employers;
- the employers with whom Refugee Talent Hub enters into a cooperation agreement (Partners);
- recipients of our newsletter;
- civil society organisations we work with in order to create better job opportunities for refugees.

What do all the legal terms mean?

As there are many legal terms used in the GDPR (AVG), we would like to explain them first.

Personal data: any data that provides information about a natural person and that allows you to directly or indirectly identify that person. For example, a name, (email) address or telephone number.

Data Subject: the person to whom personal data relates, or their representative. For example, the candidate whose address and phone number are stored.

Processing personal data: anything you can do with personal data, such as:

- collecting, recording and organising data;
- data retrieval, modification and consultation;
- providing data to others;
- the blocking or destruction of data.

Controller: the person or organisation that determines:

- whether personal data may be processed and, if so, which data;
- for what purpose such personal data may be processed;
- what exactly that processing entails; and
- which means may be used in the process.

Processor: the organisation that processes personal data for the Controller. In order for this processing to come about, a processor agreement is drawn up.

Processor agreement: an agreement in which the Controller (Partner) and the Processor (Refugee Talent Hub) agree on the processing of personal data.

What personal data does Refugee Talent Hub request from you?

Refugee Talent Hub only collects and processes data voluntarily provided to us through registration, online or by email. We treat all data confidentially and only use it to inform candidates about our activities or (when registering for an activity with one of our Partners) to inform Partners about who is coming. From Data Subjects (candidates) we process the following data: First name, Last name, Email address, Telephone number, Date of birth, Country of birth, Postal code, City, Residence status, Level of Dutch, Level of English, Desired professional sector, Education, LinkedIn profile, Work experience, and CV.

From our Partners, we process the following data: Company name, Contact first name, Contact last name, Contact email address, Contact phone number, Contact position.

We process this data to collect information about the candidates who are in our database / want to participate in our activities. This information is collected because it is necessary for the activities carried out by Refugee Talent Hub: bringing refugees and the labour market closer together.

Why and how do we process your personal data?

When processing personal data, we comply with the law. We process this data in a proper, careful and transparent manner, as required by law. The personal data belongs to Data Subjects and Partners and we use it only for the purposes we have mentioned above. If we want to use the data more broadly, we seek consent from the person in question and/or ensure we have a legal basis for doing so.

Data Subjects (candidates) who register with us and Partners of Refugee Talent Hub are responsible for the accuracy of the personal data. Candidates can access, change or delete their data themselves at any time by logging into their [personal online account](#). We regularly check whether we are still allowed to retain personal data:

- If Data Subjects **have not logged in for 6 months** (or have never logged in after logging in 6 months ago), **we will send an email** to ask if their data is still correct and if they are still interested in RTH activities, and with a request to log in to (1) check and update their data or (2) unsubscribe. This group will continue to receive emails from us.
- If they do not respond to this (not logging in) and **remain inactive** (neither logging in nor registering for Refugee Talent Hub activities) **for the following 6 months, we will send another email**. This email will indicate that the account will be set to inactive and that the Data Subject will no longer receive messages from Refugee Talent Hub. The Data Subject can log in to avoid this. **Two weeks after this email, the Data Subject's account will be changed to 'inactive'.**
- If Data Subjects **have had an inactive status for one year, their data will be deleted.**

We ask our Partners to delete any personal data received from Data Subjects within one week of the joint activity of Refugee Talent Hub and Partner.

How did we get your personal data?

We obtained your personal data from you by creating an account on www.refugeetalenthub.com/en/register.

With whom do we share your personal data?

Personal data is stored in our Salesforce system and managed by Refugee Talent Hub. Besides us, Partners, and Data Subjects themselves, no other parties will have access to the personal data for which we are responsible.

The parties who receive access to your data via us, may only use those data under the condition that they provide you with a service in partnership with Refugee Talent Hub.

In suspicious situations, we are required by law to share your data with government agencies.

How do we secure your personal data?

To secure your personal data, we have taken appropriate technical and organisational measures, based on available technology, implementation costs, the type of personal data and the risks involved, thus complying with the requirements in Article 32 of the GDPR (AVG). For example, Refugee Talent Hub's website has an SSL certificate and uses a firewall to prevent misuse.

Where is your data stored?

We store your data in various databases, always using strict security measures. Your data is only stored within the European Union. Furthermore, we enter into non-disclosure agreements (a so-called 'NDA') and processor agreements with all Partners specifically designed to protect your privacy.

Would you like to view, amend or delete your data?

You have the right to know how we process your personal data. The privacy legislation has several rights, we are happy to inform you about these rights and how you can use them. If you want to exercise any of these rights, please contact us by email at info@refugeetalenthub.com.

- **Right to access personal data:** you have the right to access your personal data and to be informed about how your personal data are processed;
- **Right to rectification of personal data:** You have the right to have your inaccurate and/or incomplete personal data amended;
- **Right to data erasure:** in specific situations, you have the right to have your personal data erased, unless there is a legal obligation to keep this personal data. Log into [your online account](#) and click on 'DELETE ACCOUNT' if you want your data deleted from our systems;
- **Right to restrict processing:** in specific situations, you have the right to have the processing of your personal data temporarily stopped;
- **Right to transferability of personal data:** in specific situations, you have the right to obtain certain personal data in a structured, common, machine-readable and accessible format and to transmit it to another controller;
- **Right to object:** in specific situations, you have the right to have the processing of your personal data temporarily stopped;
- **Right to withdraw your consent:** if you have given us consent to process personal data, you can withdraw this consent at any time.

What do we do if there is a data breach?

A data breach is a security incident where personal data has been lost, or where potentially unlawful processing of personal data cannot be ruled out. Should Refugee Talent Hub discover that a data breach has occurred, depending on the severity of the data breach, we notify the Personal Data Authority (AP) within 72 hours. If the data breach is relevant to Data Subjects, we will let them know within 72 hours after we discover the data breach, and take appropriate action.

Which cookies (and similar techniques) do we use?

On our website, we use our own cookies as well as third party cookies. Cookies are information files that can be automatically stored on/read from the visitor's device (such as PC, tablet or smartphone) when visiting a website. This is done via the web browser on the device.

These cookies collect the following data from you:

- IP address
- Cookie ID
- Website and click behaviour
- Referrer-URL

When you visit our website for the first time, we will display a message explaining cookies and asking for your consent to use cookies.

Why do we use cookies?

Refugee Talent Hub uses cookies to analyse and improve the website, to make your visit to our website easier and to offer appropriate features via social media and online advertising platforms.

How can I enable, disable or delete cookies?

More information on enabling, disabling and deleting cookies can be found in the instructions and/or by using your browser's Help function.

Delete and manage cookies:

- [Microsoft Edge](#)
- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Apple Safari](#)

LinkedIn Insight Tag

On our website, we use the LinkedIn Insight Tag. This is a piece of JavaScript code added to our website. It helps us understand how well our LinkedIn advertisements are performing and gathers information about visitors who come to our website through LinkedIn.

The LinkedIn Insight Tag places a cookie in the user's web browser. This gives us information about the user's LinkedIn profile, such as the LinkedIn ID. This information shows us how our LinkedIn advertisements are doing, but it doesn't tell us who you are. We use this to assess the effectiveness of our ads, helping us better tailor our future activities.

If you want to know how LinkedIn uses your data, please check out the LinkedIn Insight Tag [FAQ](#). For more information on how LinkedIn collects and processes data, refer to [LinkedIn's Privacy Policy](#).

You can choose whether or not to use LinkedIn cookies. You can manage this in the settings page on LinkedIn. You can find more information about this in the [LinkedIn Cookie Policy](#).

Changes to this privacy and cookie statement

When our services change, we will also update our privacy and cookie statement. Therefore, please check this privacy and cookie statement regularly for the most up-to-date information.

Filing a complaint

If you feel we are not helping you properly with questions about your privacy, you have the right to file a complaint with the [Personal Data Authority](#).

Refugee Talent Hub

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Registered with the Dutch Chamber of Commerce
under file number 66975085