

# Privacy Statement

## I. GENERAL PROVISIONS

### A. Introduction

1. This Privacy Statement explains how we treat your personal data and is applicable to the registration and processing of all personal data that you provide to Start People NV in any way.
2. It describes how we collect, use and process your personal data and how we satisfy our legal obligations towards you. Start People NV attaches the greatest importance to the privacy of your personal data and will only use it for the purposes described in this Privacy Statement.
3. This Privacy Statement is applicable to the personal data of our Website Users, Candidates, Clients, Suppliers and other people with whom we may contact in order to find out more about our Candidates.
4. In view of the relevant data protection legislation, including, but not limited to, the General Data Protection Regulation (GDPR) 2016/679, Start People NV is the company that is responsible for your personal data.
5. Start People NV is entitled to adjust this Privacy Statement at any time. Any change to the Privacy Statement will be announced on this website. The most current version of the Privacy Statement can be found on this website at any time.
6. If any provision from this Privacy Statement is completely or partially invalid, voidable or in conflict with the law, it shall be deemed to stand on its own and to be inapplicable. In such a case, Start People NV will replace the provision in question with a provision of equal intent that is not completely or partially invalid, voidable or in conflict with the law. The other provisions of the Privacy Statement will remain in full force.
7. Belgian law is applicable to this Privacy Statement. The Court in Antwerp is authorized to acknowledge any disputes.

### B. Definitions

**Candidates** – All applicants for all roles advertised or promoted by Start People NV, including permanent, part-time and temporary positions and freelance assignments with Start People NV Clients, as well as people who have sent a resume to Start People NV that is not related to a specific job. Individual contractors, freelancers and supplier employees who have been proposed for positions at Start People NV Clients as part of an MSP offering or otherwise will be treated as candidates for the application of this Privacy Statement.

**Clients** – This category includes our customers and others to whom Start People NV provides services in the course of its business.

**General Data Protection Regulation (GDPR)** – A European Union statutory instrument that aims to harmonize the European data protection laws. It took effect on May 25, 2018 and any references to it must be interpreted accordingly so that any national legislation that implements the regulation is included.

**Managed Service Provider (MSP) Programs** – Outsourcing by Clients of the management of external personnel (including freelancers, independent contractors and temporary employees) to an external recruitment provider.

**Recruitment Process Outsourcing (RPO) services** – Full or partial outsourcing of the recruitment process for permanent employees to a recruitment provider.

**Personnel** – Includes employees and interns who are directly involved in the Start People NV business as well as specific other people who are involved in the provision of service to Start People NV. Personnel does not include individuals hired by Start People NV for the purpose of being placed

with Clients outside of an RPO /MSP agreement (i.e., project sourcing, temporary work). These individuals are treated in the same way as the Start People NV Candidates and are included under this Privacy Statement.

In the same way, independent contractors and consultants who perform services for Start People NV are included under the definition of “Supplier” for the purposes of this Privacy Statement.

**Suppliers** – Refers to partners and companies and independent contractors and freelancers who provide services to Start People NV. In specific cases, Start People NV will outsource the services it provides to Clients to external suppliers who perform services on Start People NV’s behalf. Suppliers that are individual contractors, freelancers, or supplier employees will be treated as Candidates for data protection purposes. In this context, Start People NV requires Suppliers to communicate the relevant parts of this Privacy Statement to their employees.

### **C. Whose personal data is processed?**

In order to be able to use the Start People NV services, you must provide the personal data necessary for the Start People NV work/services.

1. **Candidate Data:** In order to provide you with the best possible employment opportunities, we need to process specific information about you. We only collect information that will help us to find you an appropriate position, such as your name, age, contact details, education details, employment history, immigration status (whether or not you require a work permit), ...  
Depending on the circumstances and the applicable local laws and requirements, we may also collect information related to your health or details of any criminal convictions.
2. **Client Data:** The data that we collect about Clients is very limited. If you are a Client, we only collect your contact data or the data regarding individual contact persons within your organization so that we can provide our services such as: finding Candidates, providing a Managed Service Provider (MSP) program and notifying you about the magazine (whether or not digital) published and commissioned by Start People NV.
3. **Personnel Data:** We must process specific information about you: your candidate data and your salary and wage statement, the name of a contact person in case of emergency, evaluation forms and payroll information.
4. **Supplier Data:** We require a small amount of information about our Suppliers, specifically, contact details within your organization (names, telephone numbers and email addresses) and your bank details so that we can pay you for the services you provide.
5. **Website Users:** We collect a limited amount of data about our Website Users that we use to help us to improve your experience when using our website and to help us manage our services. This includes information such as the manner in which you use our website, the frequency with which you access our website and the times when our website is most popular.
6. **People whose data we receive from Candidates and Personnel, such as references and contact persons for emergencies:** In order to be able to offer Candidates appropriate job opportunities in a safe manner and to provide for every possible event for them and our personnel, we require some basic background information.

### **D. How do we collect your personal data**

1. Personal data that you give to us, for example:
  - by entering your details on the Start People NV website or via an application form, as part of the registration process;
  - by leaving a printed resume at an Start People NV office;
  - by emailing your resume to an Start People NV consultant or being interviewed by an Start People NV consultant;
  - by applying for jobs through a job aggregator, which then redirects you to the Start People

- NV website;
  - by entering your personal details into an Start People NV microsite;
  - through a social media channel such as Facebook or Twitter;
  - where you, as a customer, proactively contact us by telephone or email;
  - when you give us your business card;
  - ...
2. Personal data that we receive from other sources, for example:
- your reference person can provide personal information about you;
  - our clients may disclose personal information about you;
  - we may also collect information about you by searching on LinkedIn and other job sites;
  - if you “like” us on Facebook or follow us on Twitter, then we receive your personal information from those sites;
  - an MSP provider may share personal information about you with us;
  - when you are listed as a customer on a list of participants of relevant events;
  - ...
3. Personal data we collect via our website:

We collect a limited amount of data about our [Website Users](#) that we use to help us to improve your experience when using our website and to help us manage our services. This includes information about the manner in which you use our website, the frequency with which you access our website, the language in which you view our website and the times that our website is most popular.

We collect your data automatically via cookies.

## **E. Usage purposes**

1. The personal data that you provide to Start People NV is processed for the purpose of:
  - a. being able to execute and manage your registration;
  - b. checking this data for completeness and correctness;
  - c. being able to give you access to and allowing you to use the Start People NV Portal(s) and/or Community Network(s);
  - d. enabling you to use the Start People NV Website and services;
  - e. entering into and maintaining with you an Employee/Employer relationship, or a relationship aimed at the acquisition/execution of assignments and maintaining and conducting a personnel, financial and payroll administration (in this regard);
  - f. being able to offer you work, assignments, Training and/or educational opportunities, career and/or professional advice and/or other (work-related) services;
  - g. assessing your suitability for a specific position or assignment;
  - h. allowing you to participate in (online) tests offered by Start People NV and generating test results;
  - i. promoting and stimulating your personal development (if and insofar as you qualify for this purpose);
  - j. bringing you into contact with or introducing you to one or more Start People NV Principals and/or relations;
  - k. having you perform work, services and/or projects at Start People NV Principals and/or relations;
  - l. informing you about similar Start People NV products and/or services;
  - m. informing you about matters that, in Start People NV’s opinion, are important for you (including (new) job openings, Training organized by Start People NV, work-related matters, etc.);

- n. informing you and/or warning you about improper use and/or misuse of its Website;
  - o. informing third parties and/or warning them about your improper use and/or misuse of the Start People NV Website, insofar as this is necessary in order to counter and/or limit such improper use or misuse;
  - p. providing it to Processors who are hired by Start People NV to perform specific tasks;
  - q. analyzing the job market and own files with Parties Involved;
  - r. placing your Profile and/or resume (whether or not anonymized), after you have provided explicit permission for this purpose, on the Start People NV Website;
  - s. periodically sending you the Company Magazine (if and insofar as you qualify for this purpose);
  - t. periodically sending you one or more journals and/or magazines, whether or not in digital form, that are relevant for professional knowledge, this in the broadest sense of the word (if and insofar as you qualify for this purpose);
  - u. informing you about the products and/or services of Start People NV's carefully selected partners by placing information about them on its Website or by including information about them in its Company Magazine;
  - v. using and forwarding it to Start People NV Principals, relations and subcontractors and to government agencies;
  - w. providing it to the group companies affiliated with Start People NV within the Start People NV concern, meaning that your data may (also) be included in the database of these affiliated group companies;
  - x. in rare cases, we may use your personal data to help us formulate, execute or defend criminal proceedings;
  - y. It is possible that we use automated technologies. Where appropriate, we will ask your permission to perform all or some of these activities;
2. By registering with Start People NV, you grant to Start People NV the right to use the data provided in this registration for the aforementioned purposes, insofar as this is in line with the relationship between you and Start People NV.
  3. You can be offered the opportunity to indicate that your Personal Data may also be used in order to inform you by email, SMS or any other electronic means of communication about products and services, not identical or similar to the services provided by Start People NV, including the products and services of Start People NV's carefully selected. You can revoke your granted permission at any time by sending an email to [info@startpeople.be](mailto:info@startpeople.be).
  4. If your data is used by Start People NV to inform you by email, SMS or any other electronic means of communication about the similar products and services offered by Start People NV, then you can object to this at any time by sending an email to [info@startpeople.be](mailto:info@startpeople.be) with the request to no longer use your data for this purpose.
  5. If your data is used by Start People NV to periodically send you the Company Magazine or one or more journals and/or magazines, whether or not in digital form, that are relevant for your professional knowledge, this in the broadest sense of the word, you can object to this at any time by sending an email to [info@startpeople.be](mailto:info@startpeople.be) with the request to no longer use your data for this purpose.
  6. If your data is provided to the group companies affiliated with Start People NV and your data is (also) included in the database of these group companies, then this Privacy Statement is also applicable with regard to the processing of your data by these group companies. All of this with the understanding that the name of the relevant group company must be read wherever "Start People NV" appears in this Privacy Statement.

#### **F. With whom do we share your personal data?**

Where appropriate and in accordance with local legislation and requirements, we may share your personal data with the following categories of people:

- Any of our group companies;
- Clients and prospects;

- Current, past or prospective employers, educators, examination institutes and employment and recruitment agencies;
- Tax, audit or other authorities;
- Third parties such as service providers who perform services on our behalf;
- Third parties such as IT Providers and document storage providers;
- Platforms for marketing technology and suppliers;
- Regarding Candidates: potential employers and other recruitment agencies/organizations, third party partners, job sites and job aggregators, MSP Suppliers.

### **G. How do we safeguard your personal data?**

1. Start People NV makes the greatest effort to take appropriate organizational and technical measures in order to protect your personal data against wrongful processing and/or loss. Start People NV employees who have access to your personal data on behalf of Start People NV are bound by a confidentiality clause.
2. Despite the security measures taken by Start People NV, it can occur that third parties nevertheless succeed in circumventing these measures and/or using your personal data for improper purposes. Start People NV may never be held liable for this situation in any way.
3. Start People NV does not accept any liability in any way for any harm resulting from the use of the Personal Data by third parties to whom this data is provided on the basis of this Privacy Statement or with your consent. Start People NV is also not liable for non-compliance with the applicable law and/or regulations (including the privacy legislation) by these third parties.

### **H. How long do we keep your personal data?**

#### **Candidates**

The personal data of candidates will be kept for two years after the internal closing of your file.

The personal data of temporary workers / permanent employees who have effectively worked with us will be kept for ten years after the internal closure of your file.

The internal closing of your file is determined on the basis of the following criteria:

- Closing of current applications;
- Contacts from which it appears that you are still looking for employment mediation.

After expiration of the aforementioned period, you will be notified before we proceed to the final removal of your file. On the basis of this notification, you can still indicate that you wish to be retained in the database longer with a view to employment mediation.

Your personal data will be kept in accordance with the specific legislation, as well as limitation periods that require us to keep your personal data longer.

#### **Personnel**

The personal data of Personnel will be kept ten years after the termination of the employment contract.

#### **Clients / prospects**

The personal data of Clients will be kept ten years after the internal closing of your file.

Your personal data will be kept in accordance with the specific legislation, as well as limitation periods that require us to keep your personal data longer.

#### **Suppliers**

The personal data of Suppliers will be kept ten years after the last invoice from your file.

Your personal data will be kept in accordance with the specific legislation, as well as prescription periods that require us to keep your personal data longer.

## Website users

The personal data of Website users will be kept for 26 months.

### I. Liability

1. Start People NV's liability for indirect damages is excluded in all cases.
2. Any potential liability is limited to a maximum amount of € 2,500 per occurrence and a maximum of € 5,000 per calendar year.
3. Furthermore, Start People NV's liability will never amount to more than what is paid by its insurance in the relevant situation.

### J. How can you access, amend or withdraw the personal data that you have given to us?

1. **Right to object:** This right enables you to object against the processing of your personal data for our legitimate interests, to enable us to perform a task in the public interest or to exercise official authority, to send you direct marketing materials and for scientific or historical research or statistical purposes.
2. **Right to withdraw consent:** When we have obtained your consent to process your personal data for specific activities, you may withdraw this consent at any time, upon which we will cease to perform the specific activity for which you previously consented unless we believe that there is an alternative reason to justify our continued processing of your data for this purpose, in which case we will inform you of this condition.
3. **Request by data subject to access data:** You may ask us to confirm what information we store about you at any time and you can request us to modify, update or delete this information. We may ask you to verify your identity.
4. **Right to deletion:** You are entitled to request that we delete your personal data in specific circumstances:
  - The data is no longer necessary for the purposes for which we originally collected and /or processed it;
  - You have withdrawn your consent for us to process your data and there is no other valid reason for us to continue the processing;
  - The data has been processed in a manner that does not comply with the GDPR;
  - It is necessary to delete the data in order to comply with our legal obligations as personal data controller;
  - If we process the data because we believe is necessary to do so for our legitimate interests, you object to the processing of your data and we are unable to demonstrate overriding legitimate grounds for our continued processing.

We are only entitled to refuse to comply with your request based on one of the following reasons:

- To exercise the right of freedom of expression and information;
  - To comply with legal obligations or to perform a public interest task or a task in the context of exercising official authority;
  - For public health reasons in the public interest;
  - For our archival, research or statistical purposes;
  - To exercise or defend a criminal procedure;
5. **Right to restrict processing:** You are entitled to request that we restrict our processing of your personal data in specific circumstances.

You are entitled to request that we restrict the processing of your personal data:

- When you dispute the accuracy of the personal data that we are processing about you. In this case, the processing of your personal data will be restricted for the period during which the accuracy of your data is verified;
- When you object to our processing of your personal data for our legitimate interests. In that case, you can request that the data be restricted while we verify our reasons for processing your personal data;
- When the processing of your data is unlawful, but you prefer to restrict our processing rather than to have your data completely deleted;
- When we have no further need to process your personal data but you require the data to establish, exercise, or defend criminal procedures.

If we have shared your personal data with third parties, we will notify them about restrictions on the processing, unless this is impossible or involves disproportionate effort.

6. **Right to rectification:** You are also entitled to request that we rectify any inaccurate or incomplete personal data that we have about you. If we have shared this personal data with third parties, we will notify them about the rectification, unless this is impossible or involves disproportionate effort.
  
7. **Right to data portability:** You are entitled to transfer your personal data between personal data controllers. In order to enable you to do so, we will provide you with your data in a commonly used machine-readable format that is password protected so that you can transfer the data to another online platform. This right to data portability applies to:
  - Personal data that we process automatically (without any human intervention);
  - Personal data that you provide to us.
  
8. **Right to submit a complaint to a supervisory authority:** You are entitled to submit a complaint with your local supervisory authority.

You can exercise any of these rights, or withdraw your consent for the processing of your personal data, by sending an email to [info@startpeople.be](mailto:info@startpeople.be).

It is important that the personal information we process about you is accurate and current. Please keep us informed if your personal information changes.

#### **K. How do we store and transfer your data internationally?**

In order to provide you with the best service and to perform the purposes described in this Privacy Statement, your data may be transferred:

- between and within USG People Belgium / Recruit entities;
- to third parties (such as advisers or other Start People NV suppliers );
- to overseas clients;
- to clients within your country who, in turn, may transfer your data internationally;
- to a cloud-based storage provider;
- to other third parties.

We want to make sure that your data is stored and transferred in a secure manner. We will therefore only transfer data outside of the European Economic Area (the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example by signing an agreement regarding transfer of data in which the standard

contractual clauses are included as adopted by the European Commission for the transfer of personal data by personal data controllers in the EEA to personal data controllers and processors in jurisdictions without adequate data protection laws.

## **L. Our legal basis for processing your data**

### 1. Legitimate interests

The GDPR states that we can process your data when it “is necessary for the purposes of the legitimate interests pursued by the personal data controller (Start People NV) or by a third party, except when such interests are overridden by the interests and fundamental rights of freedom of the data subject (you) that require protection of personal data”.

#### - Candidate data

It is reasonable to expect that when you are looking for employment or have posted your resume on a job site or professional network site, you agree that we collect and use your personal data in order to offer or provide our recruitment services to you, share that information with prospective employers and evaluate your skills according to our job vacancies. When it may be possible that you could get the job, your prospective employer may also want to double check information that you provided to us or confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with local laws.

We want to provide you with applicable job recommendations and relevant articles in order to help you in your job search. We therefore believe it is reasonable that we process your data in order to ensure that we send you the most appropriate information.

We also need to use your data for our internal administrative activities, such as payroll and invoicing.

#### - Client data

In order to be able to guarantee that we provide you with the best possible service, we store your personal data and/or personal data of individual contacts within your organization and we keep records of our conversations, meetings, registered job vacancies and placements. We consider this use of your data as necessary for our legitimate interests as an organization that provides you with various recruitment services.

#### - Supplier data

We store the personal data of individuals within your organization and your financial details in order to facilitate the receipt of and the payment for your services as one of our suppliers.

All of these activities are necessary within the scope of our legitimate interests as a recipient of your services.

#### - People whose data we receive from candidates and personnel, such as references

If a candidate or a prospective member of Personnel indicated you as one of their references, then we use your personal data in order to contact you for a reference. This is a part of our quality assurance procedure and that is why we consider this necessary for our legitimate interests as an organization that offers recruitment services and employs



people itself.

## 2. Consent

In certain circumstances, we are obligated to obtain your consent for the processing of your personal data regarding specific activities. Depending on what we do with your information exactly, this consent will be opt-in consent.

The GDPR states that consent is “any freely given, specific, informed, and unambiguous indication with which the data subject accepts processing of personal data regarding him/her by means of a statement or unambiguous active action”.

This means that:

- you must give us your consent freely, without our pressuring you in any way;
- you must know to what you are providing consent;
- you must have control over the processing activities to which you provide consent;
- you must take unambiguous active action in providing your consent.

We will keep records of the consents that you have provided in this manner.

You are entitled to withdraw your consent at any time by sending an email to [info@startpeople.be](mailto:info@startpeople.be)

## 3. Contract

As soon as there is a contractual relationship between parties, the processing of your personal data will occur on the basis of the legal foundation in executing an agreement.

### **M. Exercising or defending criminal procedures**

It may be necessary at times for us to process personal data and, where appropriate and in accordance with local laws and requirements, sensitive personal data in connection with exercising or defending criminal procedures. The GDPR allows this processing when it “is necessary for the establishment, exercise or substantiation of a legal claim or when courts act in their legal capacity”.

## **II. SUPPLEMENTARY PROVISIONS**

**In addition to the General Provisions (part I), the provisions contained in this section are applicable if and insofar as you use the Start People NV Website.**

### **1. Website**

1. Start People NV is responsible for the content of the website <https://www.gsk-stage.be>.
2. The Start People NV Website is public and accessible worldwide, with the exception of the Portal(s) and/or Community Network(s) present on the Website.
3. Each Data Subject can visit the Start People NV Website without communicating his/her Personal Data to Start People NV.

### **2. References and links**

The Start People NV Website contains references and/or hyperlinks to one or more third party websites. Start People NV is not liable in any way for the manner in which these third parties deal with the privacy legislation. Start People NV therefore recommends that you also read the privacy policy of these third party websites so that you are informed about how these third parties deal with your Personal Data.

### **3. Use of log files**

The Start People NV Website automatically collects specific non-identifiable information concerning the visitors to its Website, including the Internet Protocol (IP) address of your computer, the date and time of accessing the Website, the internet address of the website from which you have been redirected to the Start People NV Website, the IP address of your Internet Service Provider, your operating system, the parts, information and pages from the Website that you visited and/or viewed, as well as the material that you send to or download from the Website. This technical information is used for the management of the Website and to optimize the Website and Start People NV services. In addition, these data can be used for historical, statistical or scientific purposes. The stored technical data can be forwarded to third parties and can be permanently stored for future use.

### **4. Cookies**

1. General information about our Cookie policy

We try to make your visit to our site as pleasant as possible. We also try to provide customized information that is adapted to your surf profile. We use cookies for this purpose.

2. What are cookies?

Cookies are small text files that are created by the web server but are stored on the device with which you visit this website.

Cookies are stored on the hard disk of your PC or in the memory of your smartphone or tablet. A cookie usually contains the name of the website from where the cookie originates, the "life span" of the cookie (that is, how long the cookie will remain on your device) and a value that usually consists of a randomly generated unique number.

3. What is the purpose of cookies?

First of all, we use cookies to improve your user experience and to help our online services function better.

In general, cookies ease and accelerate the interaction between you and the website or (mobile) application that you visit. For example, they help you navigate between the different parts of a website. If we can identify you with a cookie, you do not always have to enter the same data, for example, your login data.

In addition, we use cookies to make the content of our websites and (mobile) applications more interesting for you. We do this by adapting that content to your personal taste and needs.

We also use cookies to identify your surfing behavior. How did you end up on our website? How long did you use it? With statistical results, we can improve our websites where necessary and respond to our users' preferences and needs. Finally, we can use this data in order to fulfill specific reporting obligations.

4. What types of cookies do we use and for what purposes

#### **Functional Cookies**

The functional Cookies remember information that you enter or indicate on the various pages. In this way, you do not always have to fill in all of your data again or indicate your preferences.

They make it possible for you to respond on our websites and they optimize the appearance of our website.

## Analytical Cookies

Analytical cookies collect general information about the manner in which our online services are used. We can make statistical analyses of the information we receive in this way. How did you end up on our web page? On which part or page do you spend the most time? With statistical results, we can make the structure, navigation and content of our online services as user-friendly as possible and improve them.

## Social media Cookies

Social media cookies are used in order to enable the integration of social networking sites on our websites. For example, they make it possible to share information that you find interesting with friends or colleagues.

They also inform us, for example, whether you have ended up on our site via social media.

### 5. An overview of the cookies that we use

The cookies that we use depend on which part of our website you arrived.

Here is an overview:

Typekit:	Offers custom fonts for a pleasant surfing experience.
AddThis:	Lets you share information or articles on our site via social media.
DoubleClick:	Reports on results from our Marketing campaigns.
Facebook Connect:	Informs us whether you have come to our site via a Facebook banner.
Google Adwords:	Reports on the results from our Marketing Campaigns through Google Adwords.
Google Analytics:	Reports on the use of pages, online forms, documents and other parts of our website.
Google Tag manager:	Optimizes and manages our cookies.
Hotjar:	Reports about the geography of visitors to our site.
Marketo:	Reports on visits and clicks on the Marketo landing pages.

### 6. How can I manage or delete cookies?

Most browsers are set up to automatically accept cookies. You can adjust the settings of your browser so that cookies are blocked or you are warned when a cookie is placed on your device. You can also manually delete the cookies from your device or have this automatically performed by your browser after each visit to the website. Consult your browser's help function for this purpose.

If you disable the cookies used by this website, it can prevent you from visiting certain areas of the website or that specific settings will not be remembered when you return to this website later. For example, specific pages will not open, specific clips will not play or specific data will not be saved in order to be filled in automatically on a subsequent visit.

## III. HOW CAN YOU CONTACT US?

If you have any questions, comments or complaints regarding this Privacy Statement and the manner in which Start People NV records, uses and processes your data, you can let us know via email to [Privacy@usgpeople.be](mailto:Privacy@usgpeople.be) or send a letter to USG People Belgium, Privacy Office, Frankrijklei 101, 2000 Antwerp.

DPO Contact information, Wim Van Wassenbergh, [wvanwassenbergh@usgpeople.be](mailto:wvanwassenbergh@usgpeople.be).

Start People NV will inform you as soon as possible, and in any case, within one month after receiving the request, of Start People NV's response to the request:

- Granting of the request.
- Impossibility to inform you of the response to the request within one month due to the complexity of the request.
- Refusal of the request and the possibility to submit a complaint to the supervisory authority or to appeal to the court.

The need for additional information when there is uncertainty regarding the applicant's identity. In principle, the requests are granted free of charge by Start People NV unless your request is apparently unfounded or excessive, in particular due to its repetitiveness. In that case, Start People NV may charge a reasonable administrative fee or refuse the request.

You are also entitled to file a complaint with the Belgian Data Protection Authority, Belgische Gegevensbeschermingsautoriteit, Drukpersstraat 35, 1000 Brussels, Tel +32 (0)2 274 48 00, Fax +32 (0)2 274 48 35, email: [commission@privacycommission.be](mailto:commission@privacycommission.be).