

Eversheds Sutherland Belgium Privacy Notice – Recruitment

Applying or considering applying for a work experience at Eversheds Sutherland (Belgium)

About this notice

This notice explains how and why Eversheds Sutherland (Belgium) CV (hereinafter referred to as “**Eversheds Sutherland**”, “**we**”, “**our**” and “**us**”) uses personal data about individuals who apply (or enquire about applying) (referred to as “**applicants**” or “**you**”) for a work experience with us.

For the purposes of the processing activities set out in this notice, we are a “**controller**” in relation to our use of your personal data. This is a legal term – it means that we make decisions about how and why we use your personal data and, because of this, we are responsible for making sure it is used in accordance with applicable data protection laws, in particular with the provisions of the General Data Protection Regulation (“**GDPR**”) and the Belgian Act of 30 July 2018 on the protection of individuals with regard to the processing of personal data. The controller in respect of personal data processed in connection with the www.eversheds-sutherland.com website is Eversheds Sutherland (International) LLP.

In this notice, when we talk about “**personal data**” we mean any information that relates to an identifiable natural person. Your name, address, contact details, salary details and CV are all examples of your personal data, if they identify you.

The term “**process**” means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.

You should read this notice, so you know what personal data we collect about you, what we do with it and how you can exercise your rights in connection with it.

What types of personal data do we collect and where do we get it from?

We collect your personal information from various sources. The table below sets out the different types of personal information that we collect and where we get it from.

Category	Type of personal data	Collected from
Contact information	<ul style="list-style-type: none"> • First Name, Last Name • Address • Email address • Contact details including mobile telephone number(s) • Your signature 	<ul style="list-style-type: none"> • You
Personal information	<ul style="list-style-type: none"> • Date of birth • Gender (if you provide us with such data) • Marital or relationship status (if you provide us with such data) • Previous and offered salary, compensation and other benefits and bank account details 	<ul style="list-style-type: none"> • You • Recruitment consultants and agencies • Your previous employers
Identity and background information	<ul style="list-style-type: none"> • LinkedIn profile and other available professional background information about you online • Career history, experience and skills • Driving licence information (if you provide us with such data) 	<ul style="list-style-type: none"> • You • Recruitment consultants and agencies

	<ul style="list-style-type: none"> • Residency and/or other visa information (where unrelated to your race or ethnicity) • Curriculum Vitae (CV) or resume • Details of education, qualifications, results and certificates and other evidence of the same • Images • Application form • Evaluative notes and decisions from job interviews • Preferences relating to job location and salary 	<ul style="list-style-type: none"> • Your previous employers • Publicly available information from online resources
Sensitive personal data	<ul style="list-style-type: none"> • Racial or ethnic origin (including your nationality and visa information) • Data concerning physical and/or mental health (including occupational health requirements, accident reports, day-to-day health concerns such as diabetes or epilepsy conditions which we should be aware of, dietary requirements, allergies,) (referred to as "Sensitive Personal Data") 	<ul style="list-style-type: none"> • You • Your emergency contact(s)
Recruitment administration, performance and grievance information	<ul style="list-style-type: none"> • Working preferences and feedback in relation to Eversheds Sutherland (Belgium) CV and our staff • Preference in relation to our use of your personal data • Interview notes and associated feedback 	<ul style="list-style-type: none"> • You

What do we do with your personal data, and why?

We process your personal data for particular purposes in connection with your application with us, and in connection with the management and administration of recruitment activities and strategies. We are required by law to always have a "lawful basis" (i.e. a reason or justification) for processing your personal data. The table below sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

Purposes of processing	Lawful basis We are permitted to process your personal data because...				
	1. You have given your consent to the processing	2. It is necessary to perform a contract with you or because you have asked us to before entering into a contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)
Administering your application for a job with us and considering your suitability for the relevant role (including organising and conducting interviews, communicating with or providing feedback to you, obtaining, considering and verifying your references and working experience,...)				✓	
Making a job offer to you and entering into a contract with you		✓		✓	
Completing all pre-contractual formalities if you are retained for the position		✓			
Supplementing our data, inter alia by using or researching data that are publicly accessible		✓			

Initiation of legal proceedings and defence in case of legal disputes



Improving our services and recruitment procedure



In the case of controls by supervisory authorities and control authorities (e.g. audits)



Note that where we have indicated in the schedule above that our processing of your personal data is either:

- necessary for us to comply with a legal obligation; or
- necessary for us to take steps, at your request, to potentially enter into a contract with you, or to perform it, and you choose not to provide the relevant personal data to us, we may not be able to enter into our contract with you.

Sensitive Personal Data

As mentioned above, we also process your Sensitive Personal Data which require a higher standard of protection under applicable laws. For such personal data, different lawful bases apply.

We only process these data if:

- You have given your explicit consent to the processing
- It is necessary for your/our obligations and rights in the field of employment and social security
- It is necessary to protect the vital interests of the data subject or another person
- It is necessary for our establishment, exercise or defence of legal claims
- It is necessary for reasons of substantial public interest

These data are only accessible to a limited category of persons appointed by us.

Who do we share your personal data with, and why?

Sometimes we need to disclose your personal data to other people.

Inside the Eversheds Sutherland network

We are part of the Eversheds Sutherland network of law firms. Therefore, we may share your personal data with other entities in the Eversheds Sutherland network for our general recruitment analysis and workforce management purposes.

Access rights between members of the Eversheds Sutherland network are limited and granted only on a need to know basis, depending – for example – jurisdictions, departments, job functions and roles.

Where any Eversheds Sutherland entities process your personal data on our behalf (as our processor), we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them.

Outside the Eversheds Sutherland network

From time to time we may ask third parties to carry out certain business functions for us, such as the administration of our payroll and our IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to other people, we will

make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them. Examples of these third party service providers include service providers and/or sub-contractors, include our outsourced payroll, HR and marketing service providers, and our IT systems software and maintenance, back up, and server hosting providers.

We are likely to share your personal data to the following categories of recipients:

- consultants and professional advisors including legal advisors and accountants;
- recruitment agencies appointed by us or you;
- trade associations and professional bodies;
- insurers; and
- governmental departments, statutory and regulatory bodies.

Where is your personal data transferred to?

Since Eversheds Sutherland is a network of different law firms operating globally, we will sometimes need to transfer your personal data to recipients in jurisdictions other than your own. The data protection laws in these jurisdictions may not provide the same level of protection to your personal data as provided to it in your jurisdiction.

If any disclosures of personal data referred to above require us to transfer your personal data from within to outside the European Union (including to the United Kingdom), we will only make that transfer if:

- the recipient country ensures an adequate level of protection for your personal data;
- the recipient or recipient country is subject to an approved certification mechanism or code of conduct with binding and enforceable commitments which amount to appropriate safeguards for your personal data;
- we have put in place appropriate safeguards to protect your personal data, such as a contract with the person or entity receiving your personal data which incorporates specific provisions as directed by the European Commission;
- the transfer is permitted by applicable laws;
- you explicitly consent to the transfer; or
- another exception applies (for occasional transfers).

If you would like to see a copy of any relevant safeguards used by us to protect the transfer of your personal data, please contact dataprotectionoffice@eversheds-sutherland.be.

How do we keep your personal data secure?

We will take specific steps (as required by the abovementioned data protection laws) to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

However please note that, in relation to any personal data you submit to us online or via e-mail, we cannot guarantee the security of data sent to us in this way. Transmission of data over the Internet is at your own risk.

How long do we keep your personal data for?

We will only retain your personal data for a limited period of time, and for no longer than is necessary for the purposes for which we are processing it for. This will depend on a number of factors, including:

- any laws or regulations that we are required to follow;

- whether we are in a legal or other type of dispute with each other or any third party;
- the type of information that we hold about you; and
- whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

What are your rights in relation to your personal data and how can you exercise them?

Depending on the circumstances, you may have the right to:

- access your personal data and to be provided with certain information in relation to it, such as the purpose for which it is processed, the recipients or categories of recipients to whom it is disclosed and the period for which it will be stored;
- require us to correct any inaccuracies in your personal data without undue delay;
- require us to erase your personal data;
- require us to restrict processing of your personal data;
- receive the personal data which you have provided to us, in a machine readable format, where we are processing it on the basis of your consent or because it is necessary for your contract with us and where the processing is automated; and
- object to a decision that we make which is based solely on automated processing of your personal data.

If the processing of personal data is based solely on consent, you shall have the right to withdraw your consent at any time, without this affecting the lawfulness of processing based on consent before its withdrawal.

Where our processing of your personal data is based on the **legitimate interests** lawful basis, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

Please contact us at dataprotection@eversheds-sutherland.be if you would like to exercise any of your privacy rights.

You also have the right to lodge a complaint with the local data protection authority. For Belgium, this is the Belgian Data Protection Authority (*'Gegevensbeschermingsautoriteit'/'l'autorité de protection des données'*).

Cookies and similar technologies

For more information regarding how we use cookies and similar technologies in connection with your use of our platforms, please read our [Cookies Policy](#).

Updates to this notice

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this notice by email and we will publish revised versions of this notice on www.eversheds-sutherland.be.

Contact

Eversheds Sutherland (Belgium) CV

De Kleetlaan 12A

1831 Diegem

Belgium

Registered with the Crossroads Bank for Enterprises under company number 0817.550.246.

If you have any queries about how we process your personal data, please contact us by sending an e-mail to **dataprotection@eversheds-sutherland.be**.

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