

# Privacy Policy of BE4 Management

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*This Privacy Policy was last updated on 14/01/2023.*

Dear,

Since your privacy is a right that we support ourselves, we have spared neither expense nor effort to provide transparency through Our privacy and cookie policies.

Out of respect for your Personal Data and based on the General Data Protection Regulation (GDPR), we strive to use all means that are available to and feasible for us to carefully process and secure the collected Personal Data of Yours.

## Terminology

We use the following terms which may be stated in both singular and plural form without losing their meaning. Some of the terms below are clearly defined by and derived from Article 4 of Regulation (EU) 2016/679, which will be abbreviated in this section as “GDPR - Article 4, (see [link](#))”.

For the purposes of this Privacy Policy these terms of which the initial letter is capitalized are:

“**Account**” refers to the personal account that was created by You or by Us to provide You with full or partial access to our Service.

“**Client**” refers to anyone or any legal entity enquiring Us for or having an agreement with Us by which We will deliver our products or services.

“**Communication**” refers to any kind of direct and indirect communication with Us, be it in a written or oral form and whether it is in person, by using the Service, (e-) mails, video or voice calls by using any form of communication technology or by contact on third-party and social media platforms that are used by the Company.

“**Company**”, also referred to as “We”, “Us”, “Our” or “Ourselves” refers to

**BE4 Management CommV**  
**Zeugsteeg 6 - 9000 Ghent - Belgium**  
**VAT BE 0723.920.502**  
**RPR Ghent**  
**[info@be4management.be](mailto:info@be4management.be)**  
**Phone: +32 467.01.56.44**

**Controller** is defined in “GDPR - Article 4 ([link](#))” as “*the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.*”

**Cookies** is a small text file that a website stores on your device such as a computer or mobile device when you visit the Service ([https://commission.europa.eu/cookies-policy\\_en](https://commission.europa.eu/cookies-policy_en)). For more information about the cookies we use and your choices regarding cookies, please visit our [Cookies Policy](#).

**Country** refers to: Belgium.

**Data Subject** is an identified or identifiable natural person and defined in “GDPR - Article 4 ([link](#))” as *“an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”*. In this privacy policy “Data Subject” refers to You, Client or employees.

**Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.

**Personal Data/ Your Information/ Personal Information** is defined in “GDPR - Article 4 ([link](#))” as *“any information relating to an identified or identifiable natural person (‘Data Subject’);*

**Processing** or to **Process** is defined in “GDPR - Article 4 ([link](#))” as *“‘processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.”*

**Processor** is “GDPR - Article 4 ([link](#))” as *“a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.”*

**Service** refers to the Website or our services, offerings, memberships, job applications or jobs.

**Service Provider** is any third-party company that or individual employed or assigned by the Company who has the task to facilitate and provide services related to the Service of the Company and the way it is used.

**Third-party Social Media Service** refers to any social network/media website or any website which is used by the User to sign up or log in on our Service.

**Usage Data** refers to the data which is collected automatically by the use of the Service or the infrastructure of the Service. For example: IP address, the time You visit or spend on specific pages of Our Service and diagnostic data.

**Website** refers to BE4 Management and accessible from <https://www.be4management.be/>

**You:** also referred to as “User” means any subject using or accessing the Service, whether the subject is as an individual, or acts on behalf of a company or a legal entity.

## Legal Context

This Privacy Policy has been mainly created with respect to:

- the [Belgian Law of 30 July 2018](#) (Law on the protection of natural persons with regard to the processing of personal data)
- and the [European Regulation \(EU\) 2016/679](#) (on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ( hereafter the “General Data Protection Regulation” or “GDPR”).

If some specific cases We may be subject to other laws and for these relevant cases We will refer to the applicable laws.

Please note that by using our Service You agree with the fact that We will Process Your Personal Data as described in this Privacy Policy.

### Two Categories Of Personal Data According To GDPR

Since We strive for transparency and unambiguity through this privacy policy, You will find below a distinction of two categories of Personal Data based on GDPR (and as summarized in the following link to Europa.eu, see [link](#)), namely:

#### *Category 1 - General Personal Data (hereafter referred to as GPD)*

“GPD” refers to any Personal Data that does not fall under the below mentioned Special Category of Personal Data (“SC-PD”) and it may be, but not limited to, the following Personal Data of Yours:

- Name
- E-mail
- Address
- CV
- Date or place of birth
- ID card/passport number
- income
- cultural profile
- Internet Protocol (IP) address (automatically collected)
- Data Usage (automatically collected)

#### *Category 2 - Special Category of Personal Data (hereafter referred to as SC-PD)*

As summarized in the following link to Europa.eu ([link](#)) and subdivided by Us in different types, the Special Category of Personal Data includes, but is not limited to, information such as:

##### *Type 1 of Special Category of Personal Data (hereafter referred to as SC-PD-T1)*

- racial or ethnic origin
- sexual orientation
- political opinions
- religious or philosophical beliefs
- trade-union membership

#### *Type 2 of Special Category of Personal Data (hereafter referred to as SC-PD-T2)*

This type of Personal Data is related to Your identity identification and may require a Copy of it:

- Your signature
- Your personal picture
- Your ID-card or passport
- Your National identification number

#### *Type 3 of Special Category of Personal Data (hereafter referred to as SC-PD-T3)*

This type of Personal Data is related to Your health details such as genetic, biometric or health data.

#### *Type 4 of Special Category of Personal Data (hereafter referred to as SC-PD-T4)*

This type of Personal Data is related to Your criminal convictions and offences unless this is authorized by EU or national law.

## Cookies

A Cookie is a small text file that a website stores on your device such as a computer or mobile device when you visit the site ([https://commission.europa.eu/cookies-policy\\_en](https://commission.europa.eu/cookies-policy_en)).

Please read our Cookie Policy, by clicking on this [link](#), in order to know which types of Cookies We or our partners use, their respective purpose and expiration time.

## The Legal Grounds and Purposes of Processing Your Personal Data

As summarized in the following link to Europa.eu ([link](#)), there are six legal grounds to process Personal Data that are listed in the GDPR and these are:

1. having the **consent** of the individual concerned to process his/her Personal Data
2. to fulfil a **contractual obligation** with the individual
3. to satisfy **legal obligations**
4. to **protect the vital interests** of the individual
5. to carry out the **task in the interests of the public**
6. to act in **legitimate interests of the company**

In the sections below You will find different purposes of Our data Processing and the legal grounds per respective purpose.

In addition, GDPR stipulates that We cannot keep Your Personal Data indefinitely. Consequently, We will generally apply this stipulation but for some of the purposes and cases of collecting Your Personal Data as mentioned below, You will find a mentioning of a specific retention time of Your Personal Data.

## Our Sources of Collecting Your Personal Data

The collection of Personal Data via the three sources below will be based on a clear purpose and on one of the legal grounds mentioned above.

### Source 1: From You as a Data Subject

You may share Your Personal Data with Us, either “on Your own initiative” or “on Our request”.

- On Your Own initiative, some examples:
  - You proceed to fill in the requested Personal Data via Our (contact) form(s) on our Website in order to allow Us to contact You
  - You provide us with more Personal Data during the Communication in order to allow Us to properly perform our services or execute Our Agreement with You.
- On Our request, an example:  
During any further Communication, agreement or relationship with You a need may arise to ask You more Personal Data in order to fulfil our legal or contractual obligations.

### Source 2: From Third Parties

Third Parties are, but not limited to:

- the health insurance fund or the registers of Health or Social Security
- any document from the police, public body or court that has relied on our services in the past or may serve Our future services for and relationship with You
- any professional or bar association to which We belong

We only collect Your Personal Data from Third Parties in case:

- this would be relevant for Us to fulfill Our contractual obligations with You or
- to act in legitimate interests of the company or
- to satisfy Our legal obligations or
- We are or obliged by the law to use this sources for collecting Your Personal Data and
- We are allowed by the law to use this sources for collecting Your Personal Data without Your explicit consent

### Source 3: From Public Sources

Public sources are, but not limited to:

- the National Gazette or the registers of companies and VAT numbers and in case:
  - this would help Us to verify Your role or that of others in a specific company/organization and
  - this is relevant for Us to fulfill our contractual obligations with You or satisfy legal obligations
- news or press articles about You or Your personal or professional profile on public networks in case this will help Us in our assessment of Your application for Our jobs or membership.

## Your Rights

In case You want to exercise any of Your following rights, then contact Us by emailing to [gdpr@be4management.be](mailto:gdpr@be4management.be) or [info@be4management.be](mailto:info@be4management.be) and by stating clearly the right you want to exercise and how You would like Us to communicate with You.

We will do our best to respond within 1 month. In case We need more time (up to 3 months from receiving Your request) we will inform You within 1 month about the additional time that We need in order process your request.

Please note that We always need a proof of Your identity in order to process Your request and that additional information may be required.

Please note, however, that We may need to retain some of Your Personal Data when we have a legal obligation or lawful basis to do so.

### Right of getting information

You have the right to ask Us why we need Your Personal Data, with whom We share it, on what legal basis we process it and how long We keep it.

Please check “GDPR - Article 12 ([link](#))” for more information about this right.

### Right of access

You have the right to ask Us

- what Personal Data we hold about You and have a consult it
- a copy of Your Personal Data we hold about You to verify its correctness

Please check “GDPR - Article 15 ([link](#))” for more information about this right.

### Right to rectification

You have the right to correct or update Your Personal Data, in case they became irrelevant, or ask Us to do so.

Please check “GDPR - Article 16 ([link](#))” for more information about this right.

### Right to transfer your data

You have the right to ask Us to transfer Your Personal Data from one organization to another. The first organization should have no objection to this.

Please check “GDPR - Article 20 ([link](#))” for more information about this right.

### Right to withdraw your consent

You have the right to withdraw your consent, by which you have allowed us to process your Personal Data, at any given time and without any motivation.

Please check “GDPR - Article 7 ([link](#))” for more information about this right.

### Right to be forgotten or removed

You have the right to ask Us to erasure Your Personal Data that We hold.

Please check “GDPR - Article 17 ([link](#))” for more information and the specific circumstances under which this right applies.

### Right to object to the processing of your personal data and to automatic decisions

You have the right to ask Us to stop processing Your personal data and in some cases You can object to automatic decisions.

Please check “GDPR - Article 21 and Article 22 ([link](#))” for more information about this right.

### Right to restrict processing

You have the right to Us to restrict processing Your Personal Data.

Please check “GDPR - Article 18 ([link](#))” for more information about this right.

## Privacy Policy for You as a User of Our Service

### To Send You our Newsletter

If you subscribe to our newsletter in order to get informed about Our new activities, services or other general information which We consider useful, We may need to process, but not limited to, the following General Personal Data (“GPD”):

- Your e-mail address
- Your First and Last Name

Please note that You will be able to unsubscribe for our newsletter at any time in case You don’t wish to receive Our newsletter anymore.

The applied Legal Ground in this case is based on your Consent.

You have the right to withdraw your consent, by which you have allowed us to process your Personal Data, at any given time and without any motivation.

Retention Time: 1 month after You unsubscribe from Our newsletter.

### To have Contact with Us

If You want to contact Us by submitting our contact form or by any means as described above with the term “Communication”, We may need to process, but not limited to, the following “GPD”:

- Your e-mail address
- Your First and Last Name
- Your phone number
- The organization or company you work or act for
- Your Country of residence
- The information You provide via Your Communication

We will contact You based on Your provided data, enquiry or specific consent in case You want to Us to send You optional information.

The applied Legal Ground in this case is based on your Consent.

You have the right to withdraw your consent, by which you have allowed us to process your Personal Data, at any given time and without any motivation.

Retention Time: 2 years after the last active contact.

We may occasionally apply longer retention times in order to comply with Our legal obligations.

### To Join Us

If You want to join Us by submitting Our form to join us or by any means as described above with the term “Communication”, We may need to perform a selection procedure after which You may get an approval to join US. Therefor We may need to process, but not limited to, the following “GPD”:

- Your e-mail address
- Your First and Last Name
- Your phone number
- The organization or company you work or act for
- Your Country of residence
- The information You provide via Your Communication

We will contact You after finalizing the selection procedure based on Your provided data, enquiry or specific consent and give You access in case You qualify to join US.

The applied Legal Ground in this case is based on Your Consent.

You have the right to withdraw your consent, by which you have allowed us to process your Personal Data, at any given time and without any motivation.

Retention Time: 2 years after the last active contact.

We may occasionally apply longer retention times in order to comply with Our legal obligations.

### To Create a Personal Account

If You want to create a personal account on Our Service by submitting Our form or by any means as described above with the term “Communication”, We may need to perform a selection procedure after which You may get an approval to get or create Your personal account. Therefor We may need to process, but not limited to, the following “GPD”:

- Your e-mail address
- Address of residence
- Your First and Last Name
- Your phone number
- The organization or company you work or act for
- Your Motivation Letter
- Your Curriculum Vitae (CV)
- The information You provide via Your Communication

We will contact You after finalizing the selection procedure based on Your provided data, enquiry or specific consent and deliver Your personal login details in case You qualify to have a personal account.



The applied Legal Ground in this case is based on Your Consent.

You have the right to withdraw your consent, by which you have allowed us to process your Personal Data, at any given time and without any motivation.

Retention Time: 2 years after the last active contact.

We may occasionally apply longer retention times in order to comply with Our legal obligations.

### [To log in to Our Members Page](#)

Once We approve to give You access to login on Our Service as a member, You may be required to fill in, but not limited to, the following “GPD”:

- Your e-mail address and/or username
- The password for that username

The applied Legal Ground in this case is based on acting in legitimate interests of the company.

Retention Time: 2 years after the last active contact.

## [Privacy Policy for Our Clients and Business Partners](#)

If case You, as a User of our Service, also become a (potential) client or Business Partner, We may also need to Process more Personal Data from You. In this case We will inform You what legal grounds of GDPR, per purpose mentioned below, are applicable and what category of Personal Data We may process.

### [To Provide And Execute Our Services, Products or Agreement](#)

#### *Requirement of General Personal Data (“GPT”)*

In order to provide You with Our services or products or to execute Our agreement with You, We will need to Process, but not limited to, the following “GPT” of You as a Client:

- Your e-mail address
- Your address of residence
- Your first and last name
- Your ID card/passport number
- The information You provide via Your Communication
- Your place and date of birth
- Your phone number
- The name of the organization or company You work or act for (if applicable)
- Your job position
- Your VAT or company number

#### *Requirement of Special Category of Personal Data (hereafter referred to as “SC-PD”)*

In some specific cases or exceptions We may need and be legally allowed to Process the “SC-PD” of Yours as described above (see “[Special Categories of Data](#)”) and more specifically the following types:

- “SC-PD-T1”
- “SC-PD-T2”
- “SC-PD-T3”

The applied Legal Ground in this case is based on fulfilling Our contractual obligation with You.

Retention Time:

- In General: 5 years after the end date of Our agreement/business relationship.
- For accounting documents: 7 years from the first day of the year following the closing of the financial year (Royal Decree of 21 October 2018, see [link](#)).
- We may occasionally apply longer retention times in order to comply with Our legal obligations.

### To Satisfy with Our Legal Obligations

In some specific cases or exceptions We may need and be legally allowed to Process the “SC-PD” of Yours as described and abbreviated above (see “[Special Categories of Data](#)”) such as:

- “SC-PD-T1”
- “SC-PD-T2”
- “SC-PD-T3”

The applied Legal Ground in this case is to satisfy with Our legal obligations.

Retention Time:

- In General: 5 years after the end date of Our agreement/business relationship.
- For accounting documents: 7 years from the first day of the year following the closing of the financial year (Royal Decree of 21 October 2018, see [link](#)).
- We may occasionally apply longer retention times in order to comply with Our legal obligations.

### Privacy Policy for Job/Internship Applicants

If You want to apply for Our jobs and/or internship vacancies We will need to be able to perform a suitable selection procedure. Therefor We may need to process Your Personal Data and ask You for the following:

- Your e-mail address
- Your address of residence
- Your first and last name
- Your ID card/passport number
- The information You provide via Your Communication
- Your place and date of birth
- Your phone number
- The name of the organization or company You work or act for (if applicable)
- Your (desired) job position or salary
- Your bank account details
- Relevant data regarding the social and fiscal legislation (family composition)
- Your career, educational or training trajectory and planning

- Your CV
- Your motivation letter
- Your references
- Your acquired information during Your application process with Us
- Your VAT number (if applicable)

The applied Legal Ground in this case is based on Our contractual obligation with You in case You are accepted for the applied job.

### **Screening**

During Your application process We may collect some of Your Personal Data from Public Sources (see section above: [link](#)) and communicated with You. You have the right to object this kind of screening by informing Us before or during the application procedure.

The applied Legal Ground in this case is based on acting in legitimate interests of the company.

Retention Time:

- In case Your application has been rejected We will store Your acquired Personal Data for 6 months starting from the date of communicating the rejection to You. As Your Personal Data, such as Your CV, must be up to date, We may ask You for an updated CV or other relevant Personal Data.
- In case Your application has been approved, Your collected Personal Data, the purposes and legal grounds will be processed with respect to the applicable law(s) and communicated to You at the latest when concluding with You any employment or internship agreement.

## Retention of Your Personal Data

Since GDPR stipulates that We cannot keep Your Personal Data indefinitely, We will apply this stipulation. For some of the purposes and cases of collecting Your Personal Data as mentioned above, You will find a mentioning of a specific retention time of Your Personal Data. In addition, We may occasionally apply longer retention times in order to comply with Our legal obligations.

Unless defined otherwise and justified by a legal ground, as described under the section "[Legal Grounds](#)", We will not retain Your Personal Data longer than necessary for the purposes mentioned above.

## Transfer of Your Personal Data

We will not transfer Your Personal Data except to our trusted Processors or their platforms which may be based in a third country (outside the E.U.) where the data protection laws may differ than those from the jurisdictions of the Data Subject. In any case we will strive for a secure processing of Your Personal Data in accordance with our Privacy Policy.

For clarification:

- We use the cloud-based storage, web development and hosting services of Wix.com which has, together with its affiliates, certified its compliance with the EU-US Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework.

*“The EU-U.S. and Swiss-U.S. Privacy Shield Frameworks were designed by the U.S. Department of Commerce and the European Commission and Swiss Administration to provide companies on both sides of the Atlantic with a mechanism to comply with data protection requirements when transferring Personal Data from the European Union and Switzerland to the United States in support of transatlantic commerce.”* (source: Privacy Shield Framework).

To learn more about the Privacy Shield Framework, visit the following [link](#).

- We use Microsoft, Zoom, WhatsApp, Google and Dropbox for communication or storage of data. These companies are compliant with the EU-US Privacy Shield Framework.

In case We are involved in a merger, acquisition or asset sale We may transfer or disclose Your Personal Data but We will inform You prior to that transfer or disclosure.

Please note that once You provide Us Your consent to this Privacy Policy and submit Your Personal Data, this will represent Your agreement to the transfer mentioned above.

## Disclosure of Your Personal Data

We do not disclose Your Personal Data with any third party unless We are allowed or obliged by law to do so. This may be required by law or by any public authority or body which provides a valid request. Some examples, but not limited to, are:

- Courts
- Government Agencies
- Police

In some other specific cases We may disclose Your Personal Data in the good faith belief that it is necessary, but not limited to:

- a) Protect and defend Ourselves in terms of Our rights, assets or legal liability
- b) Prevent or investigate possible misuse of Our Service
- c) Protect the public or other Users in terms of (personal) safety
- d) Fulfill Our contractual agreement with You

Within the above context We may disclose Your Personal Data to, but not limited to, the following third parties:

- Relevant Professional or Bar Associations to which We belong
- Our subcontractors on which We rely to perform our services properly (e.g. Postal services)
- Consultants or platforms for IT and CRM services and other professional advisory/services (e.g. Our Lawyer, website builder, platform to offer Our services or to send Our newsletters)
- Cookie providers (check our [Cookie Policy](#))
- Our financial or payment services providers (e.g. Our accountant or bank)

## Storage and Security of Your Personal Data

We always strive to use the most acceptable means to store and secure Your Personal Data, however We cannot guarantee its absolute security or be held responsible for any consequence or damage as a result of any misconduct, abuse, misuse, loss or publication of your Personal Data.

Besides Our Local Drives and Devices We use the cloud-based storage, web development and hosting services of Wix.com which has, together with its affiliates, certified its compliance with the EU-US Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework.

In addition, We use Microsoft, Zoom, WhatsApp, Google and Dropbox for communication or storage of Personal. These companies are also compliant with the EU-US Privacy Shield Framework.

For clarification:

*“The EU-U.S. and Swiss-U.S. Privacy Shield Frameworks were designed by the U.S. Department of Commerce and the European Commission and Swiss Administration to provide companies on both sides of the Atlantic with a mechanism to comply with data protection requirements when transferring Personal Data from the European Union and Switzerland to the United States in support of transatlantic commerce.”* (source: Privacy Shield Framework).

To learn more about the Privacy Shield Framework, visit the following [link](#).

## Links or Buttons to Other Websites or Social Media

In case We provide on Our Service links or buttons to websites of third parties and if You click on any of them, then please note that:

- You will be directed to the website of the respective third party
- and We cannot be held liable for any content, practices, cookie or privacy policy of the website or services offered by this third party

Some of the these links or buttons may direct You to (Our) social media accounts and consequently We advise you to read the privacy policy of those social media networks and any site You visit.

Please find below the links to the privacy policies of the following third parties:

- [Microsoft](#)
- [Zoom](#)
- [Twitter](#)
- [LinkedIn](#)
- [Google](#)
- [Wix](#)
- [Facebook](#)
- [Instagram](#)

## Children's Privacy

For Your information, please find the legal basis of the paragraphs below via the following link [Regulation \(EU\) 2016/679](#) and more specifically under *Article 8*.

We do not have any intention to address any individual under the age of 13 (hereafter the “Child”) or collect his or her Personal Data. In case the “Child” wants Us to Process his/her Personal Data for a justifiable reason, then We will need to have the consent of the holders of parental responsibility over the “Child”.

In case any holder of parental responsibility over a “Child” discovers that his/her “Child” has provided Us his/her Personal Data, then We request him/her to inform Us urgently.

In case We discover that We have collected Personal Data of a “Child” without the consent of a holder of parental responsibility over the “Child”, then We use all possible means to remove that Personal Data from Our storage.

You have the right to withdraw your consent, by which you have allowed us to process your Personal Data, at any given time and without any motivation.

## Complaints

If you have a complaint about the way We process Your Personal Data, please contact Us first so We can help You in the best possible way.

You can also submit Your complaint to the following link of the data protection authority:

<https://www.gegevensbeschermingsautoriteit.be/burger/acties/klacht-indienen>

or by (e-)mailing a letter to:

*Gegevensbeschermingsautoriteit  
Drukpersstraat 35, 1000 Brussel  
+32 (0)2 274 48 00  
[contact@apd-gba.be](mailto:contact@apd-gba.be)*

## Modifications to this Privacy Policy

We reserve the right to unilaterally modify or edit our Privacy Policy at any given time.

Any new or modified version will be published on Our Website and consequently be applicable from the date of its publication. In this case You will find the new date mentioned above (see “*Last updated on*”).

You are advised to review this Privacy Policy periodically for any changes.

## Contact Us

If you have any questions about this Privacy Policy, You can contact us by emailing to [gdp@be4management.be](mailto:gdp@be4management.be) or [info@be4management.be](mailto:info@be4management.be).



BE4 Management

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