

thalento<sup>®</sup> 



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Thalento<sup>®</sup> nv's Privacy Statement  
for the Thalento<sup>®</sup>  
OpiBuilder platform

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## Privacy statement

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Thalento® NV is committed to guarantee privacy and data protection. By means of this privacy statement (hereinafter referred to as the "Privacy Statement"), Thalento® NV wishes to inform the user in detail about the processing of his/her personal data and associated rights when using the **Thalento® OpiBuilder platform**. We encourage you to read this privacy statement carefully.

By using the Thalento® OpiBuilder platform, Thalento® NV has access to your personal data, which it will process with respect for the privacy of the user and with compliance to the law of 8 December 1992 on the protection of privacy with respect to the processing of personal data (<https://www.privacycommission.be/nl/privacywet-en-uitvoeringsbesluiten>), which, from 25 May 2018, will be replaced by the (European) General Data Protection Regulation (also known as the GDPR). (<http://eur-lex.europa.eu/legal-content/NL/TXT/?uri=CELEX:32016R0679>).

If you wish to receive more information concerning privacy and data protection, please visit the website of the Commission for the Protection of Privacy (also referred to as the Privacy Commission) via the link: <https://www.privacycommission.be/en>.

Thalento® NV is committed to protect your privacy and personal data. If you have any questions about this Privacy Policy, please contact us at any time at [privacy@thalento.com](mailto:privacy@thalento.com).

This Privacy Statement was last reviewed on 23 May 2018.

## To whom does this privacy statement apply?

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This Privacy Statement applies to all of the users of the Thalento® OpiBuilder platform.

## Contact details Thalento® nv

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THALENTO® nv  
Corda Campus - Corda 6  
Kempische steenweg 293/35  
3500 Hasselt, Belgium  
Company number 0830.586.452  
Contact: [info@thalento.com](mailto:info@thalento.com)

## What means ...

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### Processing of personal data

By 'processing' we mean any operation or set of operations performed on personal data (whether or not by automatic means, such as collection, recording, organisation, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, as well as the blocking, erasure or destruction of personal data).

By 'personal data' we mean all information about an identified or identifiable natural person.

### A processor

A processor shall be the natural or legal person, de facto association or public administration processing personal data on behalf of the controller, with the exception of persons who are authorised to process the data under the direct authority of the controller.

### A controller

A controller is any natural or legal person, de facto association or public administration which alone or jointly with others determines the purposes and legal and technical means of the processing of personal data.

### A user

A user is an individual who uses the Talento® OpiBuilder platform.

## Who is responsible for the processing?

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### Talento® as a processor

Talento® is considered to be a processor of personal data in so far as it processes personal data on behalf of its customers, in which case these customers act as data controllers.

### Talento® as the data controller

Talento® is considered controller when it determines the purposes and means of the processing of personal data.

A user who wishes to exercise his rights as a data subject must always contact the controller.

## Who is a data protection officer?

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Thalento® NV has appointed a Data Protection Officer in charge of supervising and monitoring Thalento®'s privacy and data protection policy with respect to the processing of personal data. You can contact the Data Protection Officer on [privacy@thalento.com](mailto:privacy@thalento.com) for all your questions concerning privacy and data protection regarding the processing of your personal data and the exercise of your rights.

## What personal data is processed by Thalento® nv on the Thalento® OpiBuilder platform?

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Thalento® processes personal identification data in order to provide the features of the Thalento® OpiBuilder platform to legitimate users. This is done on the basis of personal data Thalento® obtains from customers who wish to make use of the Thalento® OpiBuilder platform. The processing of personal data is based on legitimate interest in the function of securing and tailoring the Thalento® OpiBuilder platform.

## Who receives my personal data?

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Your personal data will not be passed on to other external parties without prior consent, unless Thalento® NV is obliged to do so on the basis of a statutory provision or a court ruling.

## Is anonymous data used for reporting purposes?

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We may use anonymous data for commercial purposes or for external reporting. Anonymous data are personal data that are rendered anonymous to such an extent that they no longer relate to an identified or identifiable person, or they are rendered anonymously in such a way that the individual is no longer recognisable, or is no longer recognisable.

## How long will my data be stored?

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Thalento® NV will only retain your personal information for the minimum period necessary to fulfill the purposes set out in this Privacy Statement, except in the case of dispute resolution or if a longer retention period is required by law. Non-personal information may be retained without limitation in time for statistical purposes.

## Data security and retention

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Thalento® NV acknowledges that the security of personal data is part of data protection. Thalento® NV therefore takes appropriate technical and organisational measures to protect your personal data against unauthorised processing or unauthorised access in order to prevent misuse.

When transferring personal data to a processor outside the EEA, Thalento® NV always does so in accordance with the terms of this Privacy Statement and Thalento® NV follows the applicable data protection laws and regulations to ensure adequate safeguards.

## Cookies

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Cookies are text files that can be placed on your computer in order to collect standard internet logging information and behavioural information. This information is used to track the visitor behaviour of the Thalento® OpiBuilder Platform and to compile statistical reports on the Thalento® OpiBuilder platform.

For more information about Thalento® NV's cookie policy, please read the Cookie Policy on the Thalento® OpiBuilder platform.

## What are my rights and how can I exercise them?

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A user who wishes to exercise his rights as a data subject must always contact the controller. See: who is responsible for processing.

How can I exercise my rights as a data controller at Thalento® NV?

You can exercise your rights by sending an e-mail to [privacy@thalento.com](mailto:privacy@thalento.com).

In order to prevent any unauthorised disclosure of your personal data, it is mandatory to send the request indicating the e-mail address linked to your Thalento® account.

Thalento® NV has one month to reply to your request. This period starts when Thalento® NV has received your application and has all the information it needs to satisfy it.

Thalento® NV will provide the requested information free of charge. Where requests are unfounded or excessive, in particular because of their repetitive nature, Thalento® NV may charge a reasonable fee or Thalento® NV may refuse the request.

If for any reason you believe that Thalento® NV has not dealt with your application correctly, you can contact the data protection officer of Thalento® NV at [privacy@thalento.com](mailto:privacy@thalento.com) and he will work with you to find a solution.

For the sake of completeness, we inform you that if Thalento® NV does not respond to your request, if it refuses or if the response does not meet your expectations, you are always entitled to lodge a complaint with the Commission for the Protection of Privacy (Privacy Committee), Drukpressstraat 35 in 1000 Brussels or [commission@privacycommission.be](mailto:commission@privacycommission.be).

### What rights can I exercise?

**Right of access:** You can ask us what personal data we process about you, what we process it for, what categories of personal data we process, with which categories of third parties we share your personal data, what the origin of the data processed is.

**Right of rectification:** It is currently possible for each user to change their password. In order to keep your data up to date, please make any changes yourself or contact us.

**Right to erase data:** You can ask us to erase your account. As a result, it is no longer possible to use the Thalento® OpiBuilder platform. After the request, Thalento® NV will suspend your account for 30 days in order to give you the necessary reflection period. After that, the account will be anonymised. See also: [Is anonymous data used for reporting purposes?](#)

**Right to limitation of processing:** in the cases provided for in Belgian and European privacy legislation. Where processing within the Thalento® OpiBuilder platform is restricted, your personal data (except for storage) will only be processed with your consent or for the creation, exercise or defence of any legal claim or for the protection of the rights of any other natural or legal person or for reasons of public interest. After obtaining this processing restriction, you will always be notified by Thalento® NV before the processing restriction is lifted.

**Right to withdraw consent:** If the processing of personal data is based on the basis of the basic consent, you as a user have the right to withdraw this consent at any time.

**Right of objection:** You have the right to object to the processing of your personal data only if the processing is based on a general interest or a legitimate interest.

### Is my data used for automatic decision making?

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There is no automatic decision-making, including profiling, within the Thalento® OpiBuilder platform.