

BELEAP Data & Privacy Policy

1. Definitions

The following terms shall have the following meanings in the context of these Data & Privacy Policy:

- 0.1 “BELEAP”, “We”, “Our” or “Us” means BELEAP Consultants B.V. (Chamber of Commerce number: 77405102)
- 0.2 “User”, “Users”, “You” or “Your” means a Professional or Client who visits or uses the Website, and/or contracts or offers Consultancy Services.
- 0.3 “Website” means the Websites operated by BELEAP and available at: BELEAP.COM, BE-LEAP.COM, BELEAP.ME, BELEAPERS.COM, and any of its regional or other domains or properties, including mobile web, iOS App and any Android App, or API or other access mechanism.

2. Our privacy obligations

- 2.1 BELEAP believes it is important to safeguard the privacy and confidentiality of information entrusted to Us. For this reason, We process Your personal data carefully and securely. In this Privacy Statement You can read how We collect, use, share and protect personal data through the Website.
- 2.2 This Data & Privacy Policy also explains how We process ‘personal data’ about people in the European Union (EU), as required under the General Data Protection Regulation (GDPR).
- 2.3 BELEAP is responsible for processing your personal data.
- 2.4 BELEAP is charged as much as possible with compliance with privacy legislation, including the information obligation and the exercise of rights. If you have questions or complaints about the processing of your personal data, you can also contact privacy@BELEAP.com.
- 2.5 We will review this policy regularly, and we may update it from time to time, without an obligatory notice to You.

3. The types of personal information We collect and hold

- 3.1 We collect personal information about our Users in order to provide our services and customer support. Our services and customer support are provided through many platforms including but not limited to: websites, phone apps, email, and telephone. The specific platform and product, service, or support You interact with may affect the personal data We collect.
- 3.2 Not all information requested, collected, and processed by Us is “Personal Information” as it does not identify You as a specific natural person. This will include the majority of content generated by You that you provide Us with the intention of sharing with other Users. Such “Non-Personal Information” is not covered by this policy. However, as non-personal information may be used in aggregate or be linked with existing personal information; when in this form it will be treated as personal information. As such, this Data & Privacy Policy will list both types of information for the sake of transparency.

- 3.3 In some situations Users may provide Us with personal information without Us asking for it, or through means not intended for the collection of particular types of information. Whilst We may take reasonable steps to protect this data, the User will have bypassed our systems, processes, and control and thus the information provided will not be governed by this policy.
- 3.4 In some situations, Users may provide Us personal information over platforms that are outside our control; for example, through social media or forums. Whilst any information collected by Us is governed by this Data & Privacy Policy, the platform by which it was communicated will be governed by its own Data & Privacy Policy.

4. How We collect personal information

- 4.1 While You use the Website, You may be asked to provide certain types of personal information. This might happen through our Website, applications, online chat systems, telephone, paper forms, or in-person meetings.
- 4.2 We may request, collect, or process the following information:
- i. Account Details – username, password, profile picture;
 - ii. Contact Details – email address, phone number;
 - iii. Location Details – physical address, billing address, time zone;
 - iv. User Generated Content – project descriptions and attachments, user profiles, reviews, ratings, etc.
- 4.3 Users can give permission for Us to connect to their account on other platforms to collect personal information, such as LinkedIn. Information collected will be governed by this Data & Privacy Policy.
- 4.4 In some situations, personal information of Users may be collected from public sources.
- 4.5 On our Website, You will encounter links to third party websites. These links may be from Us, or they may appear as content generated by other users. These linked sites are not under our control and thus We are not responsible for their actions. Before providing Your personal information via any other website, We advise You to examine the terms and conditions, the data & privacy policy, and cookie policy before using that website.

5. How we use personal information

- 5.1 The information We request, collect, and process is primarily used to provide Users with the service they have requested. More specifically, We may use Your personal information for the following purposes:
- i. to provide the service you have requested;
 - ii. to facilitate the creation of a Service Agreement;
 - iii. to facilitate the creation and contracting of an Assignment;
 - iv. to provide technical or other support to you;
 - v. to answer enquiries about our services, or to respond to a complaint;
 - vi. to promote our other services which may be of interest to you;
 - vii. to allow for debugging, testing and otherwise operate our Website;
 - viii. to conduct data analysis, research and otherwise build and improve our Website;
 - ix. to comply with legal and regulatory obligations;
 - x. if otherwise permitted or required by law; or

- xi. for other purposes with your consent, unless you withdraw your consent for these purposes.
- 5.2 The 'lawful processing' grounds on which We will use personal information about our Users are (but are not limited to):
 - i. when a User has given consent;
 - ii. when necessary for the creation, contracting, and performance of an Assignment to which the User is party;
 - iii. processing is necessary for compliance with our legal obligations;
 - iv. processing is necessary in order to protect the vital interests of our Users or of another natural person.
 - v. processing is done in pursuing our legitimate interests, where these interests do not infringe on the rights of our users.
- 5.3 We use an automated calculation of the estimated success ratio when matching a User or Users to an Assignment. The primary way this occurs is through User profiles and User generated data or content; in this context, User generated data or content will include reviews and ratings that Users receive related to Assignments.

6. When we disclose personal information

- 6.1 The personal information of Users may be held, transmitted to or processed on our behalf by our third-party service providers. Our third-party service providers are bound by contract to only use Your personal information on our behalf, under our instructions.
- 6.2 Our third-party service providers include:
 - i. Cloud hosting, storage, networking and related providers;
 - ii. SMS providers;
 - iii. Payment and banking providers;
 - iv. Marketing and analytics providers; and
 - v. Security providers.
- 6.3 We may also disclose Your personal information to third parties for the following purposes:
 - i. if necessary, to provide the service You have requested;
 - ii. We receive court orders, subpoenas or other requests for information by law enforcement;
 - iii. if otherwise permitted or required by law; or
 - iv. for other purposes with Your consent.

7. Accessing, correcting, or downloading your personal information

- 7.1 You have the right to request access to the personal information BELEAP holds about You. Unless an exception applies, We must allow you to see the personal information We hold about you, within a reasonable time period, and without unreasonable expense for no charge. If you wish to access information, We hold on You, that is not accessible through the Website, please contact Us via privacy@BELEAP.com.
- 7.2 You also have the right to request the correction of the personal information We hold about You. If You require assistance, please contact Us via privacy@BELEAP.com.