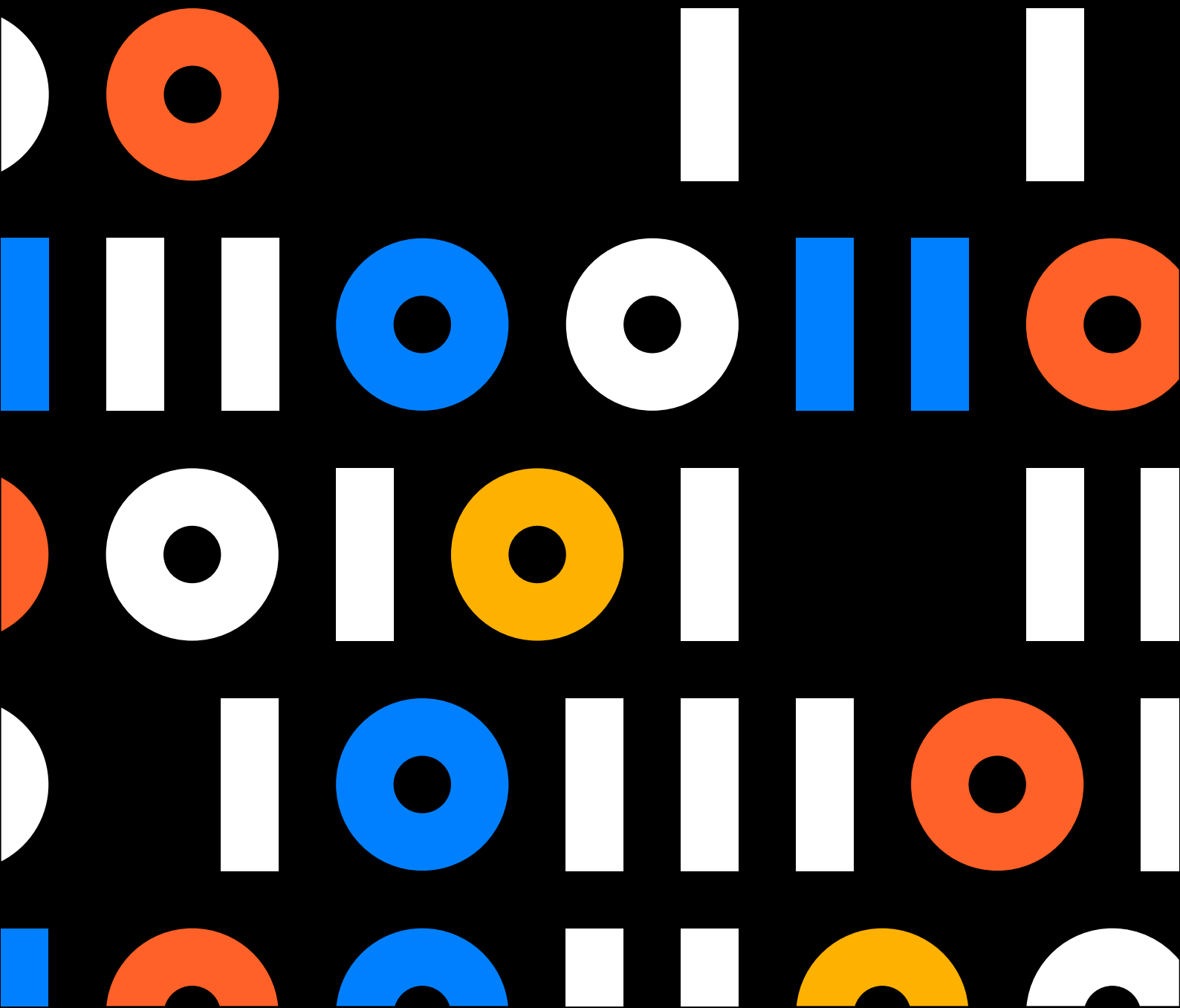


nomios

# Applicant Privacy Statement

Version 0.6  
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## CHANGELOG

Version	Date	Prepared by	Approved by
Version 0.5	12-01-2026	Espen van der Burg	Tim Fleur
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## 1. Introduction

This is Nomios' Applicant Privacy Statement, it provides information on the processing of personal data of the Applicants of Nomios Belgium which will, for the purposes of this Applicant Privacy Statement, be referred to as ("Nomios"). Nomios Belgium is based at Excelsiorlaan 89, 1930 Zaventem.

This Applicant Privacy Statement may be amended over time. You are advised to regularly review the Applicant Privacy Statement for possible changes. We use personal information for various purposes, as described in detail below.

## 2. When does this Applicant Privacy Statement apply?

### 2.1 Personal data

Personal data is all information that identifies or can identify a living individual, the data subject. If the information allows you to tell who someone is, or in combination with other information allows you to do so, it is considered personal data. This includes obvious identifiers like a name, phone number, email address, home address, date of birth, and photos, but it also includes less obvious identifiers such as bank account numbers, employee numbers, and technical identifiers (such as an IP address or device ID). Even without a name, if the information can identify a specific individual, it is considered personal data. Some categories of personal data are considered more sensitive than others and require a higher level of protection. These are called "special categories of personal data" and include personal data about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sexual life or orientation or include genetic or biometric data used for the purpose of uniquely identifying a natural person.

During the course of your application for a role at Nomios, we will collect and process various types of personal data of you. This Applicant Privacy Statement explains what personal data is processed, for what purpose, and what third parties receive your personal data.

## 2.2 Processing of personal data of Applicants

Under data protection law anything you do with personal data is considered processing. Processing is a very broad term that includes activities such as collecting, storing, using, sharing, sending, updating, correcting, deleting and destroying. Even if the personal data is at rest in some database, it is considered processing. This Applicant Privacy Statement applies to Nomios' processing of personal data of all its (former) applicants who applied for any role at Nomios (who will, after this, be referred to as the "Applicants").

## 2.3 Role Nomios

Nomios is the controller for the processing of all personal data of you, as described in this Applicant Privacy Statement. Nomios determines how your personal data is processed, and for what purpose.

## 3. For which purposes do we process your personal data?

Nomios may process your data for various purposes, all of which have been set out below. This may be personal data that you provided to us explicitly, but also personal data that we collected or generated ourselves. The legal basis of the processing activities as indicated below may either be the necessity for the performance of Nomios' obligations under the employment agreement or the necessary legitimate business purposes of Nomios. In exceptional cases we may ask you for consent for the processing of your personal data.

Exceptions to the retention periods set out below may apply in case the personal data is required for the establishment, exercise or defence of legal claims.

## 3.1 3.1. Recruitment

### 3.1.1. Purpose

If you contact one of our recruiters, was referenced by a Nomios Employee, or apply directly for a job through our website or social media pages, we process the personal data that either you or a third party provide to us during the application process in our recruitment database, Recrutee. We use the personal data in Recrutee to conclude, and communicate with you during, the recruitment process.

### 3.1.2. Personal data

For this purpose, we process personal identification information, contact details and CV.

### 3.1.3. Retention

For this purpose, we retain your personal data until four (4) weeks after the application process has been finalised. After this period, your personal data is deleted from our systems, unless you have provided consent. With your consent we keep your personal data for one (1) year to see if another suitable role becomes available. If you have become an Employee, your personal data is partially transferred to our Human Resource Management ("HRM") system to be used for the commencement of your employment. The personal data not necessary for the commencement of your employment is deleted from our systems.

## 4. Who has access to your personal data?

### 4.1. Access to your personal data within Nomios

The HR department has access to the personal data Nomios processes of you in our Recruitment system Recrutee. Besides access by the HR department, your personal data can be temporarily accessed by a member of the relevant Nomios departments, but only to the extent necessary to fulfil their respective tasks. Meaning they have access insofar required for conducting the interviews with you and completing the recruitment process by filling the vacancy. Without prior written authorization of Nomios, employees and independent contractors of Nomios shall not, directly or indirectly, access, use for any purpose, disclose to

anyone, publish, exploit, take, copy, alter, destroy, or remove from the offices of Nomios, nor solicit, allow or assist another person or entity to access, use, disclose, publish, exploit, take, copy, alter, destroy or remove from the offices of Nomios, any personal data or part thereof of another employee or job applicant of Nomios, except: (i) as permitted in the proper performance of their duties for Nomios; (ii) as permitted in the ordinary course of Nomios' business for legitimate business purposes; or (iii) as otherwise required by applicable laws and/or regulations.

## **4.2. Access to your personal data by third parties**

The following third parties have access to your personal data, where relevant, for the provisioning of their products or services to Nomios: - IT suppliers - Assessment agencies In the event such third parties are given access to your personal data, we will take the required contractual, technical and organisational measures to ensure that your personal data are only processed to the extent that such processing is necessary and that these third parties will only process your personal data in accordance with applicable (local) law.

## **4.3. The use of your personal data by data processors**

When a third party processes your personal data solely following Nomios' instructions, it will act as a data processor. We enter into a data processing agreements with such processors which set out the conditions on which the processing of personal data by the processor is allowed. In this agreement we include obligations to ensure that your personal data are processed by the processor based solely on Nomios' instructions and for the purposes set out by Nomios.

## **4.4. International Data Transfer**

Our aim is to process your personal data within the European Economic Area ("EEA"). There may, however, be occasions when we need to transfer your personal information outside of the EEA to a country that is not regarded under European Law as providing the same level of data protection as the country in which Nomios is based. In these circumstances we will take appropriate steps to

ensure that your personal data is adequately protected. Typically, such steps include carrying out a data transfer impact assessment, security reviews of the recipients, and putting in place contracts with such recipients which include the standard contractual clauses (SCCs) to ensure they employ the same or similar appropriate technical and organisational measures as Nomios, so your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the contact details below.

## 5. How is your personal data secured?

At Nomios, we apply a combination of technical and organisational measures to protect your personal data against loss, theft or other unlawful use. The technical measures include implementing access controls, encryption and firewalls. Furthermore, we take organisational measures such as training all employees to handle your personal data responsibly, continuously monitor our systems to prevent unauthorized access, and audit our compliance with the GDPR.

In case of a data breach, we will notify you promptly if it is likely to result in a high risk to your rights or freedoms, as required by law.

## 6. What rights do you have regarding your personal data?

Under the GDPR, you have the following rights:

**Right of access:** you may request information about the processing and a copy of the personal data we process of you.

**Right to rectification:** you may request us to correct inaccurate or complete incomplete personal data of you.

**Right to erasure:** you may request the erasure of your personal data in certain cases, such as when the personal data are no longer necessary for the purpose or when you have objected to the processing.

**Right to restriction of processing:** you may request us to restrict the processing of your personal data in certain cases, such as when you contest the accuracy of the personal data or have objected to the processing.



**Right to data portability:** you may request your data in a machine-readable format for transfer to another provider in the case the processing is based on consent or the performance of a contract, and the processing is carried out by automated means.

**Right to object:** you may object to the processing of your personal data based on legitimate interests such as direct marketing. We shall no longer process the personal data unless there is a compelling legitimate ground to do so, which overrides your interest, rights and freedoms, or for the establishment, exercise or defence of legal claims.

**Right to withdraw consent:** The right to withdraw the consent you have given at any time. When you have withdrawn your consent, we will not process your personal data any further. This does not affect the lawfulness of the prior processing during which your consent was not yet withdrawn.

To exercise these rights you can contact us using the contact details below. To ensure the security of your personal data, we may require proof of your identity. We will respond with the decision regarding your request within one month; however, this response may state that the response period is extended by a further two months if necessary, depending on the complexity of your request or the number of requests received.

## 7. Data protection officer

At Nomios, we have appointed a Data Protection Officer (DPO) to ensure compliance with data protection regulations, including the GDPR. The DPO oversees our data protection strategy, trains staff, conducts audits, ensures that your rights are respected, and that all data processing is conducted securely and in compliance with data protection legislation. The DPO serves as the point of contact for any privacy-related questions or concerns.

If you have any questions about this Applicant Privacy Statement or wish to exercise your rights, you can contact our Data Protection Officer (DPO) at:

Nomios Belgium, Excelsiorlaan 89, 1930 Zaventem.

Tel: 03 808 88 88

Email: [anai.christiaens@cranium.eu](mailto:anai.christiaens@cranium.eu).

If your query is not adequately addressed, you may contact your local data protection authority, Belgian Data Protection Authority, to lodge a complaint.

## 8. Statement management

### 8.1. Statement Maintenance

All inquiries about this Applicant Privacy Statement must be directed to the DPO via e-mail [anai.christiaens@cranium.eu](mailto:anai.christiaens@cranium.eu).

### 8.2. Publication

This Applicant Privacy Statement shall be available to all Applicants through Nomios' website or via alternative means as deemed appropriate by the DPO.

### 8.3. Revisions

The DPO is responsible for the maintenance and accuracy of this Applicant Privacy Statement. Once a year this Applicant Privacy Statement is reviewed. Changes to this Applicant Privacy Statement will come into force when published on Nomios' website.

This Applicant Privacy Statement has been last revised as per 15/01/2026