

PRIVACY POLICY SMULDERS WEBSITE

INTRODUCTION

In the exercise of its activities, SMULDERS GROUP NV processes various data, both commercial - as Personal Data.

SMULDERS GROUP NV and all its affiliates and subsidiaries value your privacy and take the protection of Personal Data very seriously. This Privacy Policy describes the policy of SMULDERS GROUP NV, and the main measures taken regarding the privacy of the users of the website and potential candidates for this Jobsite.

Furthermore, this Privacy Policy describes what Personal Data we process from you, on what basis, why and how long we keep it. This Privacy Policy also informs you of your rights and how to exercise them.

DEFINITIONS

Scope

This Privacy Policy applies to all users and potential candidates of this Jobsite.

Data Controller

SMULDERS GROUP NV, with registered office at Hoge Mauw 200, 2370 Arendonk, Belgium with company number BE 0533.835.144 as well as its affiliated companies, is the controller of your Personal Data. When processing your Personal Data, SMULDERS GROUP NV will respect the General Data Protection Regulation ("GDPR") and the applicable national privacy laws. SMULDERS GROUP NV, as the controller, will always process all Personal Data in a transparent, proportionate, and lawful manner and only for the purposes listed in this Privacy Policy.

For more information in connection with the processing of your Personal Data, you can always contact our GDPR referent at privacy@smulders.com.

1. What Personal Data is processed?

We collect and process various Personal Data from the users of our website and the candidates for the Jobsite (for the last category of data subjects, we refer you specifically to our Privacy Policy on the Jobsite).

These include the following Personal Data:

- a. If you are a user of our web site:
 - Information about your computer or mobile device and your visits and use of the Website, including your IP address, operating system, browser type and geographic location.
- b. If you contact us via the contact form:
 - Personal Data, such as first and last name, mobile phone number, e-mail address.
 - Other information that you provide to us in the field 'How can we help?'

2. Why is this Personal Data being processed and what is the legal basis for the processing?

a. If you are a user of our website

Our legal basis is legitimate interest (Article 6(1)(f) GDPR) in ensuring the functionality, security, and analysis of the website.

b. If you contact us via the contact form

- **For the processing of Personal Data (name, phone number, e-mail):**
 - our legal basis is the performance of a contract or steps prior to entering into a contract (Article 6, §1, (b) GDPR) if the inquiry relates to services or job applications.
 - our legal basis for responding to general inquiries is our legitimate interest (Article 6(1) (f) GDPR).
- **Other information provided in 'How can we help you?' field:**
 - our legal basis is the performance of a contract or steps prior to entering into a contract (Article 6(1)(b) GDPR) **or**
 - our legal basis is the legitimate interest, depending on context (Article 6 (1)(f) GDPR).

3. Duration of processing?

The Personal Data of the users will be kept for a maximum of six months. Your Personal Data is only accessible to our own employees and the website host.

4. Sharing And Transfer of Personal Data (Recipients of Personal Data)

Certain categories of Personal Data collected may be shared with third parties who are either independent controllers, or provide us with specific services relating to the support and operation of our website, in particular our processors:

- that provide statistical research and analysis.
- that provide hosting of the Website, related databases, and Cloud computing.

On rare occasions, we may be required to disclose your Personal Data pursuant to a court order or to comply with other mandatory laws or regulations to public authorities or other third parties to fulfill obligations in compliance with legal regulations.

Together, we make every effort to adequately secure your Personal Data. Your Personal Data will not be sold, rented, distributed, or otherwise made commercially available to third parties except as described above or with your prior consent.

5. What are your rights?

If you wish to exercise any of your rights under this section or under applicable laws, please contact our GDPR referent via e-mail at yourprivacyrights@smulders.com. To ensure the protection of your Personal Data, we may request additional information to verify your identity before processing your request.

We will respond to your request without undue delay and no later than one (1) month from the date of receipt. This period may be extended by an additional two (2) months if necessary, taking the complexity and number of requests into account. In such cases, we will inform you of the extension and the reasons for the delay within the initial one (1) – month period.

- **Right to be informed and right of access**

You have the right to access your Personal Data free of charge at any time, as well as the use we make of your Personal Data in accordance with the applicable provisions.

- **Right of rectification, erasure, and restriction**

You are free to choose what Personal Data to share with us. In addition, you always have the right to request us to rectify, supplement or delete your Personal Data.

You cannot oppose the processing of Personal Data necessary to support our recruitment and selection processes and the data we are required to keep and process about you by law.

You may also request to restrict the processing of your Personal Data.

- **Right of objection**

You also have a right to object to the processing of your Personal Data for severe and legitimate reasons.

- **Right of data portability**

You have the right to obtain your Personal Data processed by us in structured, common, and machine-readable form and/or to transfer it to other responsible parties in accordance with the applicable provisions.

- **Right to withdraw consent**

To the extent that the processing is based on your prior consent, you have the right to withdraw that consent.

- **Rights related to automated decision-making including profiling**

The processing of your Personal Data does not include profiling, nor will you be subject to automated decisions by us.

6. Complaints

If you have a question or complaint, please contact us asap: privacy@smulders.com

You are also entitled - if you believe that your Personal Data has been processed in violation of applicable data protection laws - to lodge a complaint with a data protection authority. You may do so in:

- Your country of habitual residence
- Your place of work
- The place where the alleged infringement occurred.

You can also contact the data protection authority in the country where our main establishment is located (Belgium), which acts as our Lead Supervisory Authority for cross-border processing.

Below are the relevant supervisory authorities and their contact details:

Belgium

Data Protection Authority (GBA):

Drukpersstraat 35, 1000 Brussels,

tel. +32 (0)2 274 48 00, fax +32 (0)2 274 48 35,

e-mail: contact@apd-gba.be.

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

Poland

Urząd Ochrony Danych Osobowych (UODO)

Website: <https://uodo.gov.pl>

E-mail: kancelaria@uodo.gov.pl

Telefoon: +48 22 531 03 00

The Netherlands

Autoriteit Persoonsgegevens (AP)

<https://www.autoriteitpersoonsgegevens.nl/een-tip-of-klacht-indienen-bij-de-ap>

Telephone: +31 70 888 85 00

France

Commission Nationale de l'Informatique et des Libertés (CNIL)

Website: <https://www.cnil.fr>

Telephone: +33 1 53 73 22 22

Germany

Bundesbeauftragte für den Datenschutz und die Informationsfreiheit (BfDI)

Website: <https://www.bfdi.bund.de>

Telephone: +49 228 99 77 99 0

(Remark: Germany also has regional supervisory authorities for each federal state.)

UK

Information Commissioner's Office (ICO)

Website: <https://ico.org.uk>

Telephone: +44 303 123 1113

7. Security measures

We have implemented security measures to prevent and manage the destruction, loss, alteration, unauthorized access, or data breach, and any other unauthorized processing of such Personal Data. In accordance with Article 28 of the GDPR, we ensure that when Personal Data is processed on our behalf by third-party service providers (processors), this processing is documented in a data processing agreement.

8. Varia

SMULDERS GROUP NV may change its corporate structure by changing its legal form by merger, acquisition, and sale. In such transactions, Personal Data will be transferred in accordance with this Privacy Policy and applicable data protection laws.

9. Cookies

For the proper functioning of this website, we use cookies. Cookies are small text files that are placed on a PC and read by a browser. See our cookie policy.

10. Social Media

Our website contains links to other sites: Facebook, LinkedIn, YouTube, and Instagram. Please note that SMULDERS GROUP NV is not responsible for the privacy practices of these sites or of its customers. We encourage you to read the privacy statements of each website that collects personally identifiable information.

- **Facebook / Meta:** <https://www.facebook.com/about/privacy/your-info> [[facebook.com](https://www.facebook.com)]
- **LinkedIn:** <https://privacy.linkedin.com/> [[privacy.linkedin.com](https://www.linkedin.com)]
- **YouTube:** <https://www.youtube.com/howyoutubeworks/privacy>
- **Instagram:** <https://privacycenter.instagram.com/policy>

11. Captcha

SMULDERS GROUP NV uses the hCaptcha security service ("hCaptcha"), provided by Intuition Machines, Inc. ("IMI"), a Delaware-based US corporation.

hCaptcha helps verify that actions (e.g., login or contact form submissions) are performed by humans. It runs automatically on designated pages (including in "invisible" mode), analyzing characteristics such as:

- IP address, server or browser details;
- Time spent on the page and mouse movements.

Collected data is forwarded to IMI in the United States. IMI acts primarily as a processor for SMULDERS GROUP NV; however, when we send data to IMI, they are the data controller and are legally bound by:

- EU-US, UK-US and Swiss-US Data Privacy Framework
- Standard Contractual Clauses (SCCs)

You must express freely given consent before hCaptcha is activated for visitors in the EEA. You can revoke this consent at any time, with no loss of access to alternative user support.

IMI minimizes long-term data retention and offers optional Zero-PII and First-Party Hosting features to reduce or avoid transfers outside Europe.

For details, see their official policies: Privacy Policy (last updated October 7, 2025): <https://www.hcaptcha.com/privacy>

12. Severability

If one or more clauses of this Privacy Statement are declared partially or fully void or non-binding by a judicial intervention, this will in no way affect the validity of the remaining clauses or the validity of the entire Privacy Statement. If SMULDERS GROUP NV wishes to modify or replace the clause(s) in question, the modified or new clause must be as close as possible to the clause(s) declared invalid or non-binding.

SMULDERS GROUP NV's failure to require strict compliance with the provisions of this Privacy Statement shall not be construed as any waiver or repudiation thereof.

13. Applicable law

Any dispute or claim relating to the processing of Personal Data and Privacy Policy or any information contained herein shall be governed by Belgian law and shall fall within the exclusive jurisdiction of the courts and tribunals of Antwerp (Belgium).

14. Updates

This Privacy Policy may be amended from time to time, within the limits of applicable data protection regulations.

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