**PRIVACY AND AI POLICY OF PAUWELS SOLUTIONS GROUP NV**

**(Version 2.4 September 2025)**

1. **Identity of the Controller**

This policy applies from September 15, 2025, and covers the entire **Pauwels Solutions Group**, namely Phoenix Holding BV (CBE 0802.117.645) and its subsidiaries, including Pyramid NV (CBE 0471.614.394), Pauwels Solutions Group NV (CBE 0466.878.816) and Pauwels Solutions Group France SARL (BODACC 811 883 255 RCS Lille Métropole). (Hereinafter collectively referred to as **Pauwels Solutions Group - PSG)**

Our internal privacy team and external DPO can be reached at [gdpr@pauwelsconsulting.com](mailto:gdpr@pauwelsconsulting.com)

Pauwels Solutions Group considers the protection of your personal data to be important.   
  
During your contact with Pauwels Solutions Group, you may share personal data with us so that we can identify you as an individual, employee of a company, etc. (Such as your full name, email address, address, and telephone number). This is your "personal data."

1. **What personal data do we process and for what purposes?**

Pauwels Solutions Group collects, records, and processes personal data from customers, candidates, employees, independent freelancers, or other persons with whom our company has contact. Data is communicated, for example, by individuals themselves when they contact us.

Personal data is always processed in accordance with the principles of privacy legislation and the General Data Protection Regulation, namely European Regulation 2016/679 of April 27, 2016, on the protection of personal data.

Personal data is processed in a lawful, proper, and transparent manner for a specific and explicit purpose. Pauwels Solutions Group also ensures data minimization through regular updates to our database.

Pauwels Solutions Group processes your personal data for the following purposes, among others:

* Customer management - collecting prospects, contact persons, company data, identification data, financial data, information and project information exchange;
* Recruitment of new employees – professional contact details, position, career experience, data related to a Customer's job description; Data relating to new employees and freelancers is uploaded to our systems so that a good match can be found between, among other things, a candidate's experience and specializations and available assignments. When entering into a new assignment within a customer agreement, personal data may be shared about the persons involved in the agreement. For example, customers may have certain requirements for security reasons that Pauwels Solutions Group must comply with. The persons concerned are always informed of this.
* Information about our professional and social activities, or any other topic that may be of interest to you, via our communication channels (e.g., newsletter, website);
* When you contact our company via social media or your profile is accessible within these platforms, personal data may be shared with Pauwels Solutions Group as part of that platform. We recommend that social media users check the privacy conditions as users of such platforms.
* For the further execution of agreements entered into;
* Handling financial commitments;
* Data analysis to improve the efficiency and performance of our services, for which AI models may be used;
* Pauwels Solutions Group uses AI tools to work smarter and more effectively and to better support candidates, employees, and employers. The use of these tools is to support the activities of PSG and will only be used for these purposes. Human intervention is always necessary when using an AI tool. Datasets are subjected to various tests to prevent bias and hallucinations and to evaluate accuracy. Pauwels Solutions Group inventories these tools and links measures to them according to the risk qualification of the AI tool and suppliers and the purpose for which they are used. These tools are also subject to technical and organizational measures designed to protect the (personal) data of Pauwels Solutions Group. If you would like more information, please contact our data and privacy team at[gdpr@pauwelsconsulting.com](mailto:gdpr@pauwelsconsulting.com) .
* In many cases, general-purpose AI (LLMs) are also used to support our employees on a license-based basis (e.g., Co-pilot), which are subject to special rules of the AI Act applicable to these models. Therefore, if you would like more technical information about these models, you may be referred to these large tech companies (Microsoft, Alphabet, Adobe, Open AI). Given the early stage of implementation of these AI tools, changes may be made to this clause.
* To comply with legal obligations;
* When the legitimate interests of the company require it, but this is always clear to the data subject, for example, security considerations.

Other data is collected automatically by cookies and other systems/applications that collect information.

Personal data is secured in an appropriate manner by means of appropriate technical and organizational measures that we prefer not to disclose. If you have any further questions about this, please contact our data protection officer (DPO) or your contact person within Pauwels Solutions Group.

Pauwels Solutions Group as Processor

When providing services on behalf of the customer, Pauwels Solutions Group sometimes gains access to the customer's personal data. In such situations, the customer will assume the role of "Controller" and Pauwels Solutions Group will assume the role of "Processor," as described in the GDPR. In these cases, you will be referred to the Controller regarding the processing of your personal data.

1. **With whom do we share our personal data?**

Pauwels Solutions Group opts for partners who can guarantee a similar level of protection for your personal data. Personal data will not be transferred outside the European Economic Area (EEA) unless sufficient safeguards are provided in accordance with the General Data Protection Regulation or the EU-U.S. Data Privacy Framework.

Your personal data may be shared with external business partners when necessary for processing. These may be suppliers of IT infrastructure, administration or accounting services, but also subcontractors or sub-processors.

With regard to our Customers, Pauwels Solutions Group acts as a Processor in most cases. In this capacity, professional data, which may contain personal data, may be shared. You will be informed of this when you join the company or when a new project is started. In any case, you can always obtain more information from our DPO.

1. **How long do we retain personal data?**

Pauwels Solutions Group strives for quality and excellence and is growing year after year. In this respect, personal data may be shared within our group and within the purposes of the processing (Phoenix Holding BV and associated entities). We regularly update our database and, if you are included in our database, we will ask you whether you still wish to be included.

The following terms have been agreed with regard to candidates:

* Rejected candidates: 2 years without consent, 5 years with consent

With regard to persons who had a contractual relationship with Pauwels Solutions Group:

* Personal data is retained for up to 10 years after the end of the last agreement with the person, for the purpose of any commercial claims and occupational accidents. However, exceptions to this period may be made in exceptional cases, such as a long-term dispute.

Electronic identification data, such as IP addresses, are automatically deleted in accordance with the data retention period as set out in the cookie policy. The expiry date can be found on the website in the cookie pop-up. There you will find detailed information about the use of cookies on the website.

1. **Rights of the data subject**

You have various rights with regard to the data we process about you. If you wish to exercise any of the following rights, please contact us or our external DPO using the contact details provided in the first section of this Privacy Statement.

**Right of access and copy**

You have the right to access your data and obtain a copy of it. This right also includes the possibility to request further information about the processing of your data,

including the categories of data processed about you and the purposes for which this is done.

**Right to modification or rectification**

You have the right to have your data modified if you believe that we have incorrect data.

**Right to erasure (right to be forgotten)**

You have the right to request that we erase your data without undue delay. However, we will not always be able to comply with such a request, for example if we still need the data for an ongoing membership or file, or if we are legally obliged to retain certain data for a specific period of time.

**Right to restriction of processing**

You have the right to restrict the processing of your data. This means that processing will be temporarily suspended until, for example, its accuracy has been verified.

**Right to withdraw your consent**

If the processing is based on your consent, you have the right to withdraw this consent at any time by contacting us.

**Right to object**

You have the right to object to the processing of your data based on our legitimate interests or the public interest. This must be done on the basis of specific reasons related to your situation. In this case, we must stop processing, unless we can demonstrate compelling legitimate grounds for continuing the processing.

However, you can always object to the use of your data for direct marketing purposes, in which case we are obliged to stop processing your data for these purposes. For promotional messages that you receive from us by email, you can easily exercise this right of objection by clicking on the "unsubscribe" button provided.

**Right to portability**

You have the right to obtain your data that you have provided to us with your consent or in performance of an agreement in electronic form. This makes it easy to transfer it to another organization.

**Right to lodge a complaint with your supervisory authority**

If you believe that we are processing your data incorrectly, you always have the right to lodge a complaint with your supervisory authority in the field of data protection. You can do this with the supervisory authority of the EEA Member State where you usually reside, where you work, or where the alleged infringement has been committed. As a Belgian company, we refer below to the contact details of the Belgian Data Protection Authority.

Belgian Data Protection Authority (GBA) Drukpersstraat 35

1000 Brussels

+32 (0)2 274 48 00

[contact@apd-gba.be](mailto:contact@apd-gba.be)

For further information and the contact details of the supervisory authority of each EEA Member State, please refer to [this website page of the European Data Protection Board](https://edpb.europa.eu/about-edpb/board/members_nl) with all relevant contact details.

**Security and confidentiality**

Pauwels Solutions Group has developed security measures, adapted at a technical and organizational level, to prevent the destruction, loss, falsification, alteration, unauthorized access, or accidental disclosure to third parties of personal data collected on the website, as well as any other unauthorized processing of this data.

Our website and/or service does not intend to collect data about website visitors who are younger than 16 years of age unless they have permission from their parents or guardian. However, we cannot check whether a website visitor is older than 16. We therefore advise parents to be involved in the online activities of their children, in order to prevent data about children being collected without parental consent. If you are convinced that we have collected personal information about a minor without this consent, please contact us at gdpr@pauwelsconsulting.com and we will delete this information.

If you have the impression that your data is not secure or there are indications of misuse, please contact us at[gdpr@pauwelsconsulting.com](mailto:gdpr@pauwelsconsulting.com) .

**Accuracy of your data**

Any person who provides data to Pauwels Solutions Group guarantees that this data is accurate and complete. Providing inaccurate data or data belonging to third parties may result in the person being denied access, temporarily or permanently, in whole or in part, to the products and services of Pauwels Solutions Group.

**Other provisions**

This Privacy and AI- Statement may be amended from time to time, taking into account, among other things, new laws and regulations or developments in this area. The amendments will automatically take effect after publication. This Policy was originally written in Dutch, when there is any doubt the dutch version will prevail.

If any of the above provisions regarding the processing of personal data or any other provision is invalid, all parties agree that it will be replaced by a provision that approximates the underlying purpose of the original provision as closely as possible.

The privacy policy at Pauwels Solutions Group is subject to Belgian law.

The Belgian authorities (e.g., the Data Protection Authority) and the courts with jurisdiction over the registered office are, to the exclusion of all others, competent to hear disputes and complaints that may arise in relation to this website or its use, or concerning the processing of personal data or any other dispute.

For matters relating to compliance with applicable legislation, rights and obligations arising from the General Data Protection Regulation, or the follow-up of any information security incident, please contact[gdpr@pauwelsconsulting.com](mailto:gdpr@pauwelsconsulting.com) .

**PAUWELS SOLUTIONS GROUP**