

# Open Analytics Privacy Notice

Last updated: 19 May 2020

## 1. About this Notice

1.1 This Privacy Notice ("**Notice**") explains how we (as defined below) collect, share and use any information that, alone or in combination with other information, relates to you ("**Personal Data**") when you ("**you**" and "**your**"):

- (a) use our website <https://www.openanalytics.eu/> (the "**Website**") as a visitor,
- (b) apply for a position ("**Applicant**"), or
- (c) act in your capacity as the contact person of our customers ("**Customer**") to which we provide our [products](#) and [services](#).

1.2 This Notice also sets out the rights that you have in relation to the Personal Data that we process about you and how you can exercise them.

1.3 Open Analytics treats compliance with its privacy obligations seriously. This is why we have developed this Notice, which describes the standards that Open Analytics applies to protect Personal Data.

1.4 For the purposes of this Notice, Open Analytics NV, with registered office at Jupiterstraat 20, 2600 Antwerpen (Belgium) and registered with the company registry under number 0543.762.796 ("**Open Analytics**", "**us**", "**we**", or "**our**") acts as the data controller for the Personal Data that is collected via the Website, during the application process and when we contracted with you to provide our products and services. As a data controller, Open Analytics is responsible for ensuring that the processing of Personal Data complies with applicable data protection law, and specifically with the General Data Protection Regulation (GDPR).

1.5 Please take the time to read this Notice carefully. If you have any questions or comments, please contact us at [dp@openanalytics.eu](mailto:dp@openanalytics.eu).

## 2. What Personal Data does Open Analytics collect and why?

2.1 The types of Personal Data that we collect about you, and the reasons why we process it, are as follows:

Personal Data we collect	Why we collect it	Legal grounds for processing
<b>Visitors' use of the Website</b>		
IP address Online identifier Device type Browser type Browser version Broad geographic location	-Delivering and maintaining our Website and ensuring that it functions properly.	Our legitimate interest to deliver our Website to you
Name Surname	-Responding to the inquiry that you send us via the <a href="#">Contact Form</a> of our Website;	- Necessity for taking steps prior to entering into a contract with a potential

Professional e-mail address	-Providing you information about our products or services.	Customer, or - our legitimate interest to manage requests from the public
<b>Applicants</b>		
Name Surname E-mail address Home address Phone number CV Education details Work History Information that you send to <a href="mailto:careers@openanalytics.eu">careers@openanalytics.eu</a>	-Enabling you to contact us or enable us to respond, provide feedback and communicate with you during the recruitment process; -Evaluating and selecting Applicants including for example setting up and conducting interviews; -Evaluating and assessing the results thereto and as is otherwise needed in the recruitment processes including the final recruitment.	Our legitimate interest to carry out recruitment and to manage the hiring process
<b>Customers</b>		
Name Surname Professional e-mail address Title and employer	- Managing our Customer relations (invoicing, managing orders and contracts)	Contractual necessity
Name Surname Professional e-mail address Title and employer	- Marketing.	Our legitimate interest to promote our products and services

2.2 When you are an Applicant, during the job application process, we do not actively request any information that reveals your racial or ethnic origin, religion, political or philosophical beliefs, trade union membership, genetic or biometric information, or information about your health/sex life or sexual orientation, or about the commission or alleged commission of criminal offences and any related legal actions. We therefore ask you not to provide such information. Nonetheless, we may have knowledge of some sensitive data (e.g. religion) if you spontaneously provide it to us in your CV.

2.3 In general, we will use the Personal Data we collect from you only for the purposes described in this Notice or for purposes that we explain to you at the time we collect your Personal Data. However, we may also use your Personal Data for other purposes that are not incompatible with the purposes we have disclosed to you (such as scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

### 3. Cookies and similar tracking technologies

3.1 Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners in order to make their websites work, or to work more efficiently, as well as to provide reporting information.

3.2 We may also collect certain information automatically from your device. Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has

interacted with our Website, including the pages accessed and links clicked. Collecting this information enables us to operate our Website and make it available to visitors.

3.3 Cookies set by the website owner (in this case, Open Analytics) are called "first-party cookies". Cookies set by parties other than the website owner are called "third-party cookies". Third-party cookies enable third party features or functionality to be provided on or through the website. The parties that set these third-party cookies can recognise your computer or mobile device both when it visits the website in question and also when it visits certain other websites.

3.4 We do not use cookies.

#### 4. Who does Open Analytics share your Personal Data with?

4.1 We may disclose your Personal Data to the following categories of recipients:

- (a) to **our third party vendors, services providers and partners** who provide data processing services to us, or who otherwise process Personal Data for purposes that are described in this Notice or notified to you when we collect your Personal Data. This may include disclosures to third party vendors and other service providers we use in connection with the services they provide to us, including to support us in areas such as IT platform management or support services, infrastructure services;
- (b) to **any competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- (c) to **our auditors, advisors, legal representatives and similar agents** in connection with the advisory services they provide to us for legitimate business purposes and under contractual prohibition of using the Personal Data for any other purpose;
- (d) to **a potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your Personal Data only for the purposes disclosed in this Notice;
- (e) to any other person if you have provided your prior consent to the disclosure.

#### 5. How we protect your privacy

5.1 We will process Personal Data in accordance with this Notice, as follows

- (a) **Fairness:** We will process Personal Data fairly. This means that we are transparent about how we process Personal Data and that we will process it in accordance with applicable law.
- (b) **Lawfulness:** We will process Personal Data only on lawful grounds.
- (c) **Purpose limitation:** We will process Personal Data for specified and legitimate purposes, and will not process it in a manner that is incompatible with those purposes, unless permitted by applicable data protection laws.
- (d) **Data minimization:** We will process Personal Data that is adequate, relevant and limited to what is necessary to achieve the purposes for which the data are processed.

- (e) **Data accuracy:** We take appropriate measures to ensure that the Personal Data that we hold about you is accurate, complete and, where necessary, kept up to date. However, it is also your responsibility to ensure that your Personal Data is kept as accurate, complete and current as possible by informing Open Analytics us promptly of any changes or errors. You should notify us of any changes to the Personal Data that we hold about you (e.g. a change of address).
- (f) **Data security:** We use appropriate technical and organisational measures to protect the Personal Data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal Data.
- (g) **Limited Retention:** We keep your Personal Data in a form that allows us to identify you for as long as necessary to achieve the purposes for which we are processing your data and do not store your data for longer, unless we must comply with applicable laws.

## 6. Data retention and deletion

- 6.1 We retain Personal Data we collect from you where we have an ongoing legitimate business need to do so (for example, to comply with applicable legal requirements).
- 6.2 When we have no ongoing legitimate business need to process your Personal Data, we will either delete or anonymise it or, if this is not possible (for example, because your Personal Data has been stored in backup archives), then we will securely store your Personal Data and isolate it from any further processing until deletion is possible.
- 6.3 If you are not successful as an Applicant, Open Analytics will keep your application form on file for future job openings no longer than two years. If you are successful and offered a job at Analytics, your Personal Data will be used to complete your hiring process by our HR department.

## 7. International transfers of data

- 7.1 Your Personal Data may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).
- 7.2 Specifically, some of our servers are located in Ireland, and some of our third party service providers and partners operate in Ireland. This means that when we collect your Personal Data we may process it in any of these countries.
- 7.3 However, we have taken appropriate safeguards with our third party service providers and partners to require that your Personal Data will remain protected in accordance with this Notice. Further details can be provided upon request.

## 8. Your data protection rights

- 8.1 You have the following data protection rights:
  - (a) If you wish to **access, correct, update or request deletion** of your Personal Data, you can do so at any time by contacting us using the following contact details [dp@openanalytics.eu](mailto:dp@openanalytics.eu).
  - (b) In addition, in certain circumstances, as stipulated in the applicable data protection legislation, you can **object to processing** of your Personal Data, ask us to **restrict processing** of your Personal Data or **request portability** of your Personal Data. Again, you

can exercise these rights by contacting us using the following contact details [dp@openanalytics.eu](mailto:dp@openanalytics.eu).

- (c) As a Customer, you have the **right to opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you.
- (d) If you have a complaint or concern about how we are processing your Personal Data then we will endeavour to address such concern(s). If you feel we have not sufficiently addressed your complaint or concern, you have the **right to complain to a data protection authority** about our collection and use of your Personal Data. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available [here](#).)

8.2 We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## 9. Linking to other websites

9.1 The Website may contain hyperlinks to websites owned and operated by third parties, such as social media's websites. These websites have their own privacy policies and we urge you to review them. They will govern the use of Personal Data you submit whilst visiting these websites.

We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

## 10. Updates to this Notice

10.1 We may update this Notice from time to time in response to changing legal, technical or business developments. When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Notice changes if and where this is required by applicable data protection laws.

10.2 You can see when this Notice was last updated by checking the “last updated” date displayed at the top of this Notice.