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APPENDIX 1 - Privacy Policy of HE Space Operations

This Privacy Policy is meant to help you understand what personal data we collect, why we collect it, and how you can update, manage, export, and delete your information.

HE Space Operations is the data controller with respect to the processing of your personal data. Read this information to learn how we process your personal data and what your rights are.

1. Personal data that we collect

There are two general categories of data: Personally Identifiable Information, which means any information that can identify a person, and Non-Personally Identifiable Information, which is aggregated data not associated with any individual, such as cookies.

There are 2 types of data that we process: information you give us (e.g. your CV) and information we collect automatically (e.g. cookies when you visit our Company website).

Information you give us

We process data that we receive from you. This contains Personally Identifiable Information and HE Space shall keep it, share it, and dispose of it according to the EU General Data Protection Regulation (GDPR).

The provision of our Service

HE Space pursues legitimate interests in offering our customers the most suitable candidate whilst offering our employees the best possible positions.

As part of offering our Service to the Clients, we process the personal data that you provide us with upon signature of a Letter of Intent, such as:

- First and last name
- Date of birth
- Current nationality
- Country of residence
- E-mail address
- Education and employment history information
- List of patents, publications, and other significant work

Information we collect automatically

When you use our online platforms, we collect information about your activity, such as your IP address and time of visit.

Non-Personally Identifiable Information (such as anonymous usage data, number of clicks, etc.) may be shared with interested third parties to help them understand usage patterns on our website.


Log data

We automatically collect certain information sent by your internet browser when you use our online platforms. That information includes your IP address, search engine used, links clicked, and search term used. We further record the time and number of your visits.

Cookies

We also use cookies (small text files sent by your computer each time you visit our online platform) to store visitor preferences and to expedite your access on our website.

You can refuse the use of cookies by selecting the appropriate settings on your browser software. Please note that there are some essential cookies that are necessary for the website to run smoothly. For all non-essential cookies, you can choose whether to accept or reject them, and this will not hinder or affect your access to our website.

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Analytics

We use Google Analytics to measure and evaluate access to and traffic on the website and create user navigation reports for our site administrators. Google operates independently from us and has its own privacy policy, which we strongly suggest you review.

2. How we use personal data

Your privacy is important to us and we will only process your data in accordance with this Privacy Policy and applicable data protection laws.

Below you can read for what purposes we use your personal data.

With your consent

We shall not forward the information you give us to third parties for marketing purposes or to add you to unsolicited mailing lists. However, we may use your personal data for consultation, own marketing research, or opinion polls when you have consented to our processing for these purposes.

You may subscribe and register for our electronic newsletter provided on our website. By subscribing and providing the requested data you consent to the processing of your personal data in accordance with our Privacy Policy in order to send you our newsletter. You have the right to withdraw your consent at any time.

Performance of a contract

We shall process your personal data where it is necessary to ensure the performance of a contract to which you are a party to.

Legal obligation

In the event that HE Space will have a legal obligation to process your personal data. For example, in order to process salary payments, to provide statistical data for the government or the tax authorities.

Legitimate interests pursued by HE Space

Primarily, we use your personal data to ensure that HE Space is offering our customers the most suitable candidates, at the same time seeking to match our employees with the best possible positions.

Candidates may provide their applications containing personal data via our website or by standard mail. With consent of the Candidate, HE Space shall store the data provided for a period of up to 24 months. We store the data on the basis of Art. 6 I a), b) and f) EU Data Protection Regulation. Our interest in storing and processing data is to submit an applicant to our customers or to offer the Candidate a position. The Candidate has the right to withdraw their consent at any time and to request deletion of their personal data.


3. Reasons we share personal data

If it is necessary to forward your data to other HE Space offices (HE Space group of undertakings) your data can be passed on to them. We will not share your personal data with third parties outside of the EEA. Also, your personal data will not be forwarded to third parties for marketing purposes.

4. How do we secure your data and how long do we store it

HE Space employs technical and organizational security measures, in order to protect any personal data administered by us against accidental or intentional manipulation, loss, destruction or unauthorized access by third parties. Our security measures are continuously upgraded in line with technological progress.

We follow Data Protection Guidelines to protect the confidentiality of your personal information. In addition, our business practices are reviewed periodically for compliance with policies and procedures governing the security and confidentiality of our information. Our business practices limit employee access to confidential information and limit the use and disclosure of such information to authorised persons.

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Personal data is deleted after expiry of the statutory or contractual retention periods. Applications sent via e-mail will be permanently deleted at your explicit request and HR data will be deleted after the contractual relationship terminated (in accordance with national laws and the specified retention periods).

5. How to access and control your personal data

If you would like to know what information we have about you, you may ask us to provide you with an overview of your personal data on file. You may also ask us to delete your personal data. You can do this by sending an email to dataprotection@hespace.com.

Please note that we may need to retain certain information to comply with national law or regulations. In certain cases, you may ask us to restrict it or you may object to certain processing.

You have the right to access your personal data (Article 15 of the GDPR). If you wish to know which personal data we process about you, you can make a written request for access to your personnel file. We will handle your request within a reasonable period of time.

Does your information appear to be incorrect, incomplete or irrelevant? Then you can submit an additional request to have your details changed or amended (Article 16 of the GDPR).

You can, in a number of cases, ask for the deletion of your data (Article 17 of the GDPR).

If you wish to receive the (digital) personal data that the HE Space processes about you, you can rely on your right to data portability (Article 20 of the GDPR). This means that you will receive your information in a format that you can easily pass on to another organisation if you wish.

You can also request to limit the processing of your data or object to it (Article 18 and 21 of the GDPR)

6. What can you do in case of a violation

If you think we have infringed your privacy rights, we kindly ask you to notify us by sending an email to dataprotection@hespace.com. This enables us to investigate the matter as soon as possible. You can also lodge a complaint at the relevant national supervisory authority.

7. Changes to this Privacy Policy

HE Space Operations is entitled to amend the Privacy Policy at any time. We will notify you by email in the event that an amendment will significantly affect your rights. The English version of our Privacy Policy is the original version.

8. Contact

If you have any questions relating to this Privacy Policy and the processing of your personal data, you may contact us at:

Controller

Mr. Keith Muirhead
HE Space Operations
Huygensstraat 44
Space Business Park
2201 DK Noordwijk
aan Zee
The Netherlands
Tel.: +31 71 341 7513
www.hespace.com

Data Protection Officer

Mr. Johan Martens
DPO Consultancy Reitscheweg 37
5232 BX Den Bosch