

PRIVACY POLICY – VOLGHE

Last updated: 25/06/2026

1. INLEIDING: RECRUITMENT IS EEN AMBACHT, VERTROUWEN IS DE BASIS

At VOLGHE, we believe that the right match never happens by chance. It requires attentive listening, thorough research, and purposeful connections. For us, recruitment is far more than a transaction; it is a profession built on expertise, with people always at its core. because we work with people, careers, and the strategic future of organisations operating in the fields of QHSE (Quality, Health, Safety & Environment) and Sustainability, trust forms the cornerstone of our services.

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That trust naturally extends to the way we collect, process, and protect your personal data.

In a market that can sometimes be characterised by speed and a lack of transparency, VOLGHE deliberately chooses an open and transparent approach. We believe legal and privacy-related information should be clear, straightforward, and easy to understand.

This Privacy Policy explains, in plain and transparent language, which personal data we collect, why we collect it, how we protect it, and the rights you have regarding your personal data.

This Privacy Policy applies to all services provided by VOLGHE, including VOLGHE Search (permanent recruitment), VOLGHE Consult (interim management and freelance solutions), as well as your use of our website and any other interactions with our organisation.

2. WHO IS THE DATA CONTROLLER?

Whenever this Privacy Policy refers to "VOLGHE", "we", "us" or "our", it refers to the legal entity responsible for the processing of your personal data (the Data Controller within the meaning of the General Data Protection Regulation (GDPR)).

Company Details

VOLGHE BV

Registered Office: Lepelhoekstraat 23, 9100 Sint-Niklaas, Belgium

Company Registration Number (CBE): BE 0763.976.849

Represented by: Anaïs Volkers

For any questions, comments or requests concerning your privacy or the processing of your personal data, you may contact us confidentially at:

Email: info@volghe.com

Telephone: +32 470 19 10 13

3. WHAT PERSONAL DATA DO WE COLLECT?

As VOLGHE provides tailored recruitment and consultancy services through VOLGHE Search and VOLGHE Consult, the personal data we process depends on the nature of your relationship with us.

We only collect personal data that is necessary for delivering our recruitment and consultancy services.

A. Candidates (VOLGHE Search - Permanent Recruitment)

When you apply for a position, register with us, or when we proactively approach you through executive search, we may process the following categories of personal data:

- Identification and Contact Information: first and last name, residential address, email address, telephone number, date and place of birth, nationality.
- Professional Information (CV): employment history, education, professional qualifications, certifications (particularly within QHSE and Sustainability), language skills, professional competencies and skills.
- Motivation and Professional Assessment: information contained in your motivation letter, interview notes prepared by our consultants, assessments regarding your cultural fit with prospective employers, your career ambitions and expectations.
- Financial Expectations: your current remuneration package, salary expectations for future opportunities.
- Publicly Available Information: information available through professional networking platforms such as LinkedIn, where relevant to your professional profile.
- Optional Information: references from former employers (contacted only with your prior explicit consent), photograph, where voluntarily included in your CV.

B. Freelancers and Interim Managers (Volghe Consult)

If you work with VOLGHE as an independent consultant or wish to do so, we may process:

- all personal data listed under the category Candidates;
- additional information relating to previous assignments and project experience;
- company information, including company name, VAT number and registered office;
- financial and administrative information, including bank account details (IBAN/BIC), hourly or daily rates, invoicing details and insurance certificates (such as professional liability insurance);
- your current availability, notice period and availability for future assignments.

C. Clients and Business Contacts

If you work with VOLGHE as an independent consultant or wish to do so, we may process:

- all personal data listed under the category Candidates;
- additional information relating to previous assignments and project experience;
- company information, including company name, VAT number and registered office;
- financial and administrative information, including bank account details (IBAN/BIC), hourly or daily rates, invoicing details and insurance certificates (such as professional liability insurance);
- your current availability, notice period and availability for future assignments.

D. Website Visitors

When you visit our website, we may process certain technical information in order to optimise the performance and functionality of the website.

This may include:

- Technical Information: IP address, browser type, operating system, device information.
- Browsing Information: pages visited, time spent on our website, links clicked, including calls-to-action such as "Find a Consultant" or "Hire Permanent Talent".
- Cookies: For more information regarding our use of cookies, please refer to Section 11 of this Privacy Policy.

4. FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS DO WE PROCESS YOUR PERSONAL DATA?

VOLGHE never processes personal data without a legitimate purpose.

Each processing activity is linked to a specific purpose and is based on one of the legal grounds set out in Article 6 of the General Data Protection Regulation (GDPR).

A. Providing Our Core Recruitment Services (Matchmaking & Mediation)

- Purpose: assessing qualifications, experience and cultural fit, introducing candidates to prospective employers or clients, coordinating interviews, managing the recruitment process from initial intake through successful placement.
- Legal Basis: Performance of a contract or taking steps at your request prior to entering into a contract.

Where we proactively approach you through executive search, processing is based on your explicit consent where required. Before presenting your profile to any specific client, we will always obtain your explicit consent.

VOLGHE does not distribute CVs indiscriminately. Transparency is fundamental to our way of working.

B. Contract and Project Management (VOLGHE Consult)

- Purpose: preparing framework agreements and project contracts, managing timesheets, processing invoicing for interim management and freelance assignments.
- Legal Basis: performance of the agreement concluded between you (the Freelancer), VOLGHE and the end client, as all parties are involved in the execution of the assignment and the related privacy safeguards.

C. Client Relationship Management (Partnership First)

- Purpose: maintaining long-term relationships with clients, informing clients about suitable candidates, discussing ongoing assignments and collaborations.
- Legal Basis: our legitimate interest in maintaining commercial relationships and continuously improving our services.

D. Compliance with Legal and Administrative Obligations

- Purpose: complying with tax, accounting, employment and other legal obligations, preventing fraud, cooperating with competent public authorities where legally required.
- Legal Basis: compliance with a legal obligation to which VOLGHE is subject.

E. Marketing and Communications

- Purpose: keeping you informed about relevant developments, market trends and insights within the fields of ESG, Sustainability and QHSE, inviting you to networking events, webinars or other professional initiatives organised by or in collaboration with VOLGHE.
- Legal Basis: your consent, where required (for example, for newsletters sent to candidates or prospective clients), our legitimate interest, where you are an existing client or business contact with whom we have an established professional relationship, and applicable legislation permits such communications.

5. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

Your personal data is treated with the utmost confidentiality.

VOLGHE only shares your personal data with third parties where this is strictly necessary for the provision of our services and always in a secure and responsible manner.

We never sell your personal data to third parties.

We may share your personal data with:

Prospective Employers and Clients

Where, following a thorough assessment, we believe you are a suitable candidate or consultant for a specific position or assignment.

Important: Your profile, CV and our recruitment notes will only be shared with a client after we have discussed the opportunity with you and obtained your explicit consent.

IT and Software Service Providers

We work with trusted partners that provide and maintain our technical infrastructure, including our Applicant Tracking System (ATS), cloud storage services, website hosting and email services.

These providers act as Data Processors on our behalf and are contractually bound by Data Processing Agreements (DPAs) requiring them to comply with appropriate technical and organisational security measures.

Financial and Legal Advisors

Our accountant, external accounting firm, payroll provider and legal advisors may process personal data where necessary for invoicing, payroll administration, legal compliance or the protection of our legitimate interests.

6. HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

VOLGHE retains your personal data only for as long as necessary to fulfil the purposes for which it was collected, taking into account applicable statutory retention periods.

Candidates and Freelancers

If you apply for a position or register with VOLGHE, your personal data will initially be retained for four (4) weeks following the completion of the recruitment process if this does not result in a placement.

Where you have provided your explicit consent to remain in our talent pool so that we may contact you regarding future opportunities within QHSE or Sustainability, we will retain your personal data for up to three (3) years following your last demonstrable activity or contact with VOLGHE.

Before the expiry of this retention period, we will contact you to ask whether you wish to remain part of our professional network.

Clients, Business Contacts and Suppliers

Personal data relating to clients, business contacts and suppliers will be retained for the duration of the business relationship and for a period of ten (10) years following its termination where necessary for contractual liability, legal claims or compliance purposes.

Accounting and Financial Records

Personal data processed for tax and accounting purposes will be retained for the statutory retention period of seven (7) years, calculated from 1 January of the year following the relevant financial year, in accordance with applicable Belgian tax and accounting legislation.

7. HOW DO WE PROTECT YOUR PERSONAL DATA?

As specialists in quality management, health and safety, and risk prevention, we fully understand the importance of effective risk management.

Accordingly, VOLGHE has implemented appropriate technical and organisational measures to protect your personal data against loss, unauthorised access, alteration, disclosure, or any other form of unlawful processing.

These measures include, among others:

- Secure servers and encrypted network connections (SSL/TLS encryption for our website);
- Strict access control mechanisms, including password policies and Multi-Factor Authentication (MFA);
- Access to personal data is strictly limited to authorised personnel whose access is necessary for the performance of their duties, including Anaïs Volkers and other authorised employees;
- Regular system backups, software updates, and security monitoring to minimise vulnerabilities;
- Collaboration with reputable IT service providers that are ISO-certified or demonstrably comply with the highest European information security standards.

8. INTERNATIONAL TRANSFERS OF PERSONAL DATA

VOLGHE primarily operates within Belgium and the wider Benelux and European markets.

As a general rule, your personal data is processed and stored on servers located within the European Economic Area (EEA).

Should it become necessary - for example through the use of certain cloud-based software solutions - to transfer personal data to a country outside the EEA, VOLGHE will ensure that such transfers take place only:

- to countries that have been recognised by the European Commission as providing an adequate level of data protection; or
- by implementing appropriate safeguards, including the Standard Contractual Clauses (SCCs) approved by the European Commission, supplemented where necessary by additional technical and organisational security measures.

VOLGHE will ensure that every international transfer of personal data complies with the requirements of the General Data Protection Regulation (GDPR) and all other applicable data protection legislation.

9. YOUR RIGHTS AS A DATA SUBJECT

You remain in control of your personal data at all times.

Under the General Data Protection Regulation (GDPR), you are entitled to exercise the following rights, which VOLGHE fully respects:

Right of Access

You have the right to request confirmation as to whether we process your personal data and, where this is the case, to obtain access to that data and receive a copy thereof.

Right to Rectification

If your personal data is inaccurate, incomplete or no longer up to date—for example because you have obtained additional professional qualifications or certifications—you have the right to request that we correct or complete your personal data without undue delay.

Right to Erasure ("Right to be Forgotten")

You may request that we erase your personal data from our systems. We will comply with such a request unless we are legally or contractually required to retain certain information, such as accounting records or contractual documentation.

Right to Restriction of Processing

Under certain circumstances, you have the right to request that we temporarily restrict the processing of your personal data.

Right to Data Portability

You have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format and, where technically feasible, to transmit those data to another data controller.

Right to Object

You have the right to object to the processing of your personal data where such processing is based on our legitimate interests.

Unless we demonstrate compelling legitimate grounds that override your interests, rights and freedoms, we will cease the processing.

You also have the unconditional right to object at any time to the processing of your personal data for direct marketing purposes.

Right to Withdraw Consent

Where the processing of your personal data is based on your consent—for example, your inclusion in our talent pool or the submission of your profile to a specific client - you may withdraw your consent at any time without providing any justification.

The withdrawal of your consent shall not affect the lawfulness of any processing carried out prior to such withdrawal.

How Can You Exercise Your Rights?

You may exercise any of the rights described above by contacting us at:

Email: info@volghe.com

To protect your privacy and the confidentiality of your personal data, we may ask you to provide proof of your identity. You are, of course, free to redact any information that is not relevant for identification purposes, such as your national registration number.

We will respond to your request within the statutory period of one (1) month, although, in keeping with our commitment to responsiveness and efficiency, we aim to respond significantly sooner whenever possible.

10. AUTOMATED DECISION-MAKING AND PROFILING

We believe in transparency and clear communication: VOLGHE does not use automated decision-making or solely automated profiling.

As reflected in our mission, we believe recruitment is a profession built on expertise and human judgement - not a transactional process that can be delegated to an algorithm.

We do not use automated CV screening or automated decision-making systems to determine whether a candidate progresses to the next stage of a recruitment process.

The assessment of your skills, experience, personality and strategic fit with a client is always carried out by experienced recruitment professionals with human involvement throughout the process.

Accordingly, no decision producing legal effects concerning you, or similarly significantly affecting you, is based solely on automated processing within the meaning of Article 22 of the General Data Protection Regulation (GDPR).

11. COOKIES AND SIMILAR TECHNOLOGIES

When you visit our website to search for a consultant or explore permanent career opportunities, VOLGHE uses cookies and similar technologies.

Cookies are small text files stored on your device that help optimise your browsing experience and enable us to understand how our digital channels perform. We use the following categories of cookies:

- **Strictly Necessary Cookies:** These cookies are essential for the proper technical operation and security of our website and cannot be disabled.
- **Analytical Cookies:** These cookies enable us to measure website traffic and analyse visitor behaviour in an anonymised manner (for example through Google Analytics), allowing us to improve our website, content and user experience.
- **Functional Cookies:** These cookies remember your preferences, such as your language settings, in order to provide a more personalised browsing experience.
- **Marketing and Tracking Cookies:** These cookies are only placed with your explicit consent through our cookie banner. They enable VOLGHE and selected third parties to display relevant advertisements and content on other websites and digital platforms.

Upon your first visit to our website, you will be presented with a transparent cookie banner allowing you to manage your cookie preferences.

You may modify or withdraw your cookie preferences at any time through your browser settings or via the cookie settings available on our website.

12. CHANGES TO THIS PRIVACY POLICY

The legal and regulatory framework governing data protection continues to evolve, as do the sectors in which VOLGHE operates.

VOLGHE reserves the right to amend this Privacy Policy from time to time to reflect changes in applicable legislation, our services, our business operations or our internal procedures.

The most recent version of this Privacy Policy is always available on our website.

The date of the latest revision is indicated at the beginning of this document.

Where changes materially affect your rights or the way in which we process your personal data, we will inform you proactively through appropriate means, such as by email where appropriate.

3. QUESTIONS OR COMPLAINTS (BELGIAN DATA PROTECTION AUTHORITY)

VOLGHE believes in open, honest and transparent communication. If you have any questions, concerns or complaints regarding the manner in which we process your personal data, we encourage you to contact us first at:

Email: info@volghe.com

We will make every reasonable effort to resolve your concerns promptly and amicably, in line with our Partnership First philosophy.

If, however, you believe that your concerns have not been addressed satisfactorily, you have the right, pursuant to the General Data Protection Regulation (GDPR), to lodge a complaint with the competent supervisory authority in Belgium:

Belgian Data Protection Authority (DPA)
Rue de la Presse 35 / Drukpersstraat 35
1000 Brussels
Belgium

Telephone: +32 (0)2 274 48 00

Email: contact@apd-gba.be

Website: www.dataprotectionauthority.be

14. FINAL STATEMENT: OUR COMMITMENT TO YOU

At VOLGHE, you are never just a number, a data record or an anonymous profile.

We treat your personal data with the same level of care, professionalism and dedication that defines our recruitment services.

We search. We find. We connect.

Always securely. Always responsibly.