

Privacy Notice

1. Introduction

Hightekers B.V. (hereinafter referred to as “Hightekers”, “We”, “Us” or “Our”) is committed to protecting the privacy and security of your personal information. We ensure the confidentiality of our consultants, employees, clients and users of our services who communicate with us (online or offline), during meetings or conferences, at events, by telephone, via our mobile apps, websites and social media platforms.

We have therefore drawn up this privacy notice to inform you about the data we collect, what we do with your information, how we protect it, and what rights and choices you have regarding your personal information.

In this document, we refer to data protection legislation, in particular the General Data Protection Regulation (GDPR), Regulation (EU) 2016/679 of 27 April 2016, which regulates the processing of personal data within the territory of the European Union, as well as the Dutch GDPR Implementation Act of 16 May 2018.

Hightekers B.V. is the data controller for the personal data we process, unless otherwise stated.

We are registered with the Dutch Data Protection Authority (AP) under registration number FG0015637.

You can contact us by telephone, email or post.

Our main address: Prins Hendrikkade 21-E, 1012 TL, Amsterdam.

Telephone: +31 20 323 5640

Email: dpo@hightekers.com

Our Data Protection Officer is: Dr Louis Sanchez de Lozada.

2. Who does this Privacy Notice apply to?

This Privacy Notice applies to:

- website visitors, to the extent we use cookies or similar technologies;
- prospects;
- customers and customer contacts;
- candidates;
- consultants;
- employees;
- suppliers; and
- other business contacts.

3. What personal data do we process?

Depending on your relationship with us, we may process the following categories of personal data:

- identification and contact data, such as name, address, email address and phone number;
- professional data, such as job title, employer, experience, qualifications, CV data and LinkedIn profile information;
- recruitment and HR data, such as application data, references, work experience, training records, attendance data and, where relevant, payroll and benefits data;
- financial and administrative data, such as bank details, invoicing data, salary-related data and tax information;
- compliance and identification data, such as copies of ID documents and work authorisation or immigration data, where necessary;
- communication data, such as emails, call notes, requests, complaints or feedback;
- website and device data, such as IP address, cookie data, log data and information about the use of our websites or applications; and
- in limited cases, special category data, for example health data, where necessary for employment, social security or legal compliance purposes and where permitted by law.

4. How do we collect personal data?

We collect personal data:

- directly from you;
- through our websites, forms, correspondence and conversations;
- from customers, suppliers, partners or referees;
- from public sources, such as professional networks or corporate websites; and
- from systems and tools used in connection with recruitment, HR, service delivery, contract management, invoicing, compliance and security.

5. Why do we process personal data and on what legal bases?

We process personal data only for specific and legitimate purposes. Depending on the context, we rely on one or more of the following legal bases: performance of a contract, compliance with a legal obligation, legitimate interests, consent, or – for special category data – an applicable exception under the GDPR.

5.1 Service delivery and relationship management

We process personal data to:

- provide services to customers;
- identify, assess, onboard, manage and support consultants, candidates, employees or contractors;
- prepare, perform and manage contracts; and
- respond to requests and maintain business relationships.

Legal basis: performance of a contract, pre-contractual steps and/or legitimate interests.

5.2 Recruitment and HR administration

We process personal data for recruitment, HR administration, payroll, benefits, absence management, performance management, disciplinary processes, grievance handling and compliance with employment and social security laws.

Legal basis: performance of a contract, legal obligation, and where required an applicable condition for special category data.

5.3 Compliance, security and business operations

We process personal data for identity verification, right-to-work checks, audit, accounting, fraud prevention, information security, access management, IT support, dispute management and the establishment, exercise or defence of legal claims.

Legal basis: legal obligation and/or legitimate interests.

5.4 Website use, analytics and service improvement

We process personal data to administer, secure, analyse and improve our websites and services.

Legal basis: legitimate interests and, where required by law, consent for non-essential cookies or similar technologies.

5.5 Marketing communications

We may use personal data to send information about our services, events, reports, news or other business updates.

Depending on the channel and applicable law, we rely on consent or on legitimate interests where this is lawful and where you have the ability to object.

You can opt out of marketing communications at any time using the unsubscribe option in the message or by contacting us.

From 1 July 2026, we apply a consent-first approach in the Netherlands for commercial phone outreach. This means that we only contact consumers by phone for marketing purposes where we have obtained prior, valid, specific and demonstrable consent. This approach also applies where the individual is a current or former customer, to the extent the communication is a marketing call.

For prospects in the Netherlands, we use contact details for commercial phone outreach, SMS or WhatsApp marketing only where we have obtained prior, valid and demonstrable consent, to the extent required under applicable Dutch law. Where consent is required, we retain evidence of that consent, including where possible the date, method of collection, wording of the consent request and channel for which consent was given.

If you withdraw your consent, or object where that right applies, we will stop using your data for that purpose and will update our prospecting or contact lists accordingly. Consent collected through pre-ticked boxes is not valid.

For existing customers, we may continue to use contact details for communications directly related to the performance, administration or follow-up of the existing contractual relationship. Where such communication has a marketing character, we apply from 1 July 2026 the relevant consent requirements for telephone marketing and, where relevant, the applicable rules for other electronic communication channels.

6. Who do we share personal data with?

We may share personal data with:

- group companies where necessary for internal administration, service delivery or governance;
- customers, prospects, consultants, contractors or other parties where necessary to provide services or manage a business relationship;
- service providers and processors such as IT, hosting, communications, payroll, recruitment, compliance, legal, accounting and support providers;
- professional advisers, auditors, insurers and external counsel; and
- competent authorities, courts, regulators or enforcement bodies where required by law or where necessary to protect our rights.

Where a third party acts as our processor, we put in place appropriate contractual safeguards.

7. International transfers

Where personal data is transferred outside the European Economic Area, appropriate safeguards are implemented in accordance with applicable privacy laws. These safeguards may include an adequacy decision, standard contractual clauses or another legally recognised transfer mechanism.

Further information about relevant international transfers can be provided upon request.

8. How long do we keep personal data?

We do not keep personal data for longer than necessary for the purposes for which it was collected, unless a longer period is required or permitted by law or is necessary for the establishment, exercise or defence of legal claims.

The applicable retention period depends on the nature of the relationship and the type of data.

For example:

- prospect data: for the period appropriate to sales follow-up or until consent is withdrawn, an objection is raised or the data is no longer needed;
- customer and contract data: for the duration of the relationship and thereafter as necessary for contractual, tax, accounting or legal purposes;
- recruitment data: for the duration of the recruitment process and, where permitted, for a limited additional period for future opportunities;
- HR and payroll data: for the employment relationship and thereafter in line with applicable employment, social security and tax retention periods; and
- security and log data: for a limited period appropriate for security, investigations and compliance.

Internal retention schedules may provide more detailed rules by category.

9. Your rights

Depending on applicable law, you may have the right to:

- be informed about how your personal data is used;
- access your personal data;
- request correction of inaccurate or incomplete personal data;
- request deletion of personal data;
- request restriction of processing;
- object to certain processing activities, in particular direct marketing;
- withdraw consent where processing is based on consent;
- request data portability where that right applies; and
- lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

You may exercise these rights using the contact details in this Privacy Notice.

10. Cookies and similar technologies

When you use our website, we may place cookies and similar technologies. For strictly necessary cookies, we rely on legitimate interests or the necessity of operating the website. For analytics, advertising or other non-essential cookies, we will request consent where required by law.

Further information about the cookies used, their purposes, retention periods and your choices is provided in our cookie notice or cookie banner, where applicable.

11. Security

We implement appropriate technical and organisational measures to protect personal data against loss, misuse, unauthorised access, disclosure, alteration or destruction. These measures are reviewed periodically and updated where appropriate.

12. Changes to this Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in law, business activities or processing practices. The latest version will be made available through the relevant channels.

13. Contact and complaints

If you have any questions about this Privacy Notice or about the processing of personal data, you may contact us using the details above.

You also have the right to lodge a complaint with the Dutch supervisory authority, the Autoriteit Persoonsgegevens.