



General Data Protection Regulation

DATE
2017

REFERENCE
GP-DPO-001 Personal Data Protection Policy

Tam Tam Consulting NV
Atealaan 34A – 2200 Herentals – Belgium
+32 14 70 10 70
info@tamtamconsulting.com



OBJECTIVE

At Tam Tam Consulting, we care about the trust of our employees, customers and suppliers. This involves respecting your privacy and protecting it with policies that govern the way your personal data are managed.

Tam Tam Consulting has customers and suppliers in many countries worldwide and is thus subject to different data protection laws and obligations.

This policy for the protection of personal data:

- reflects our commitment to manage your personal data in a secure and legal manner;
- establishes a uniform and adequate level of protection of personal data in the countries where we operate;
- set standards for the processing of personal data of our employees, customers and suppliers around the globe.

These standards apply whether the personal data is processed by Tam Tam Consulting or by a third party on behalf of Tam Tam Consulting. They have been translated into 10 commitments for processing personal data, which are in line with local data protection laws in the countries where we operate.

TAM TAM CONSULTING - 10 COMMITMENTS

These 10 commitments are intended to inform you about the minimum applicable standards we use to process your personal data. They describe what each standard or principle involves in practice for you and your personal data.

I. FAIR AND LAWFUL PROCESSING

Tam Tam Consulting processes personal data in a fair and lawful way. This means that the processing must be based on applicable law and be in line with the reasonable expectations of the data subjects whose personal data is processed.



What this means to you:

When you provide us with your personal data or when we collect personal data about you in any other way, it will be processed in the legitimate interests of the company and in a way that does not override your rights and freedom. By providing us with your personal data, you agree with your personal data will be processed by us as described in this policy and any other privacy notice we provide you with respect to your personal data.

2. PURPOSE LIMITATION AND SPECIFICATION

Tam Tam Consulting processes personal data only for the purposes communicated to you and not in a way which is incompatible with the purposes for which the personal data were obtained.



What this means to you:

You will be informed by a privacy notice of the purposes for which your personal data will be processed, which generally will be for HR management and administration purposes. For customers and suppliers this is respectively for customer and supplier management. Should Tam Tam Consulting wish to use your personal data for any other purpose, you will be notified of this in advance.

3. TRANSPARENCY

Tam Tam Consulting will inform employees, customers and suppliers about the details of the processing of their personal data and about the types of personal data that are collected, the purposes for which personal data will be processed, the recipients with whom the data are shared (such as third-party service providers) and the rights you have following data protection legislation.



What this means to you:

We will notify you about the processing of your data in our contracts with you and/or in our terms and conditions or by means of our privacy notice. We will strive to make this information clearly understandable. Should you have any questions, please contact us via the contact details included in the notice.

4. STORING YOUR PERSONAL DATA

As soon as personal data is no longer necessary and the minimum retention terms specified by specific local laws have been complied with, the personal data will be anonymized or securely deleted.



What this means to you:

At regular intervals, we will check which personal data are no longer necessary for the purposes for which it was obtained. This will ensure that we only store personal data that is necessary. When the agreement or the (commercial or employment) relationship you have with us is terminated, we may store the personal data you provided in the context of such an agreement or relationship for an additional period. This is necessary to comply with the minimum legal retention terms.

5. DATA QUALITY

Personal data that is processed must be adequate, relevant, not excessive, accurate and kept up to date. Tam Tam Consulting does not store personal data in case it might become useful in the future.



What this means to you:

Upon regular intervals, we check the correctness and relevance of the personal data we hold about you. If it is incorrect it will be updated or deleted. In accordance with your rights as a data subject, you have the right to request correction of incorrect personal data and to request deletion of any irrelevant personal data we hold about you.

6. SECURING YOUR PERSONAL DATA

We ensure that your personal data is adequately protected against any type of harm, such as unauthorized access or disclosure, loss, theft or damage.



What this means to you:

At Tam Tam Consulting, we implement security processes to ensure that your personal data is adequately protected. The level of security will be adapted to the nature of the personal data and the processing operations we carry out and will be updated as technology evolves. When we work with third parties who process personal data on our behalf, we will ask them to apply the same level of security measures when processing your personal data.

7. SENSITIVE PERSONAL DATA

Sensitive personal data will only be processed in limited circumstances, for instance when you provide your explicit consent or if more security measures are necessary to protect the data. In certain countries, sensitive personal data may only be processed to comply with legal requirements (e.g. health records) and may not be further processed for other purposes.



What this means to you:

The sensitive personal data that we process relate to our employees. Only in exceptional circumstances will sensitive personal data of customers or suppliers be collected and processed by us. As this information is likely to be of a private nature, we will treat sensitive personal data with even greater care than other personal data and will apply more stringent security measures to protect your sensitive personal data.

8. CROSS-BORDER SHARING OF YOUR PERSONAL DATA

Where personal data is transferred abroad or a database with personal data is accessed by a person located in another country, specific requirements may apply. When your personal data is shared with third parties and processed on behalf of Tam Tam Consulting, we will oversee that they process and protect your personal data with due care.



What this means to you:

When a third party located in another country processes personal data on our behalf, we insist that they apply this same level of protection when processing your personal data.

9. YOUR RIGHTS

Our employees, customers and suppliers whose personal data we process have certain rights; to access their personal data, to request rectification of any incorrect personal data and to request deletion of any irrelevant personal data that we hold about them.



What this means to you:

If you want to learn more about the personal data we hold about you, you may request access to your personal data. We will do our best to provide you with an overview of the personal data we hold about you in a clearly understandable form. Should you notice that certain data is incorrect or irrelevant, we will strive to comply with your request to correct, update or delete it.

10. ACCOUNTABILITY

The party responsible for each personal data processing operation that takes place is referred to as the data controller. He or she is considered as the central actor who determines the purposes and means of the processing of personal data.



What this means to you:

Tam Tam Consulting is responsible for the processing of your personal data in line with the local laws of the country where it operates (Belgium). In this policy, the applicable standards that must be complied are laid down.

DEFINITION OF TERMS USED IN THIS POLICY

Personal data means any information relating to an identified or identifiable natural person (referred to as the 'data subject'), including name, photos, contact information, financial information, social security number and other information that alone or in combination with other data could identify or could be used to identify the data subject. The concept of personal data is broader than information or data that is typically considered to be private or confidential.

- **Sensitive personal data** includes any personal data revealing information on a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sexual orientation, criminal history, physical or mental health and in some countries; any social security number, financial account or credit card number, biometrics information, or a government identifier (such as for instance a person's driver's license).
- **Processing** means any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organization, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.
- **Customer** means a prospective, current or former partner, customer or client of the company, including any individual agent, employee, representative, customer or client of a company customer from which Tam Tam Consulting has obtained personal data.
- **Supplier** means a prospective, current or former partner or supplier of the company, including any individual agent, employee, representative or supplier of a company supplier from which Tam Tam Consulting has obtained personal data.
- **Employee** means any applicant for employment with the company or any current or former employee, contractor and other personnel of the company.

CONTACT

gdpr@tamtamconsulting.com

+32 14 70 10 70