

Privacy Notice

Last updated: 23 November 2025

1. Introduction

We respect your privacy and are committed to protecting your personal data in accordance with the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR") and applicable Belgian data protection legislation. This Privacy Notice explains how HR Flow Partner BV collects, uses, stores, discloses, and protects personal data when you engage with our services, interact with us as a client, candidate, coachee, supplier, or visitor to our website.

By using our services, you acknowledge that you have read and understood this Privacy Notice.

2. Data controller

HR Flow Partner bv

Registered address: Amédé Brackestraat 39, 1950 Kraainem, Belgium

Email: info@hrflowpartner.be

Company number / VAT: BE1012 092 852

We determine the purposes and means of processing your personal data.

3. Categories of personal data we process

The personal data we collect depends on the nature of our relationship with you and the services provided. We may process the following categories:

- **Identification and contact data:** Name, address, email address, telephone number.
- **Professional and career data:** CV and resume information, employment history, skills, qualifications, references, assessment results.
- **Financial and administrative data:** Bank account details, invoicing information, VAT number (if applicable).

Special categories of data (Sensitive data)

We process sensitive data (e.g., health information) only when strictly necessary, and always based on your explicit consent or when required by law (e.g., monitoring of work absences in the context of HR consulting).

Website and technical data

- IP address, browser information, cookies or similar technologies (see our Cookie Policy).

We do not knowingly collect data from individuals under 16 years old.

4. Purposes and legal bases for processing

Your personal data is processed for the following purposes:

Service delivery and business operations

- Interim management missions
- HR consulting assignments

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- Executive or HR coaching
- Talent identification and candidate management/assessment
- Communication and relationship management

Legal basis: Contract performance, legitimate interest, or consent when required.

Contractual and pre-contractual obligations

- To prepare, enter into, or perform a contract.

Legal basis: Article 6(1)(b) GDPR.

Legal and regulatory compliance

- Accounting, taxation, employment regulations, or obligations imposed by Belgian or EU law.

Legal basis: Article 6(1)(c) GDPR.

Marketing and communication

- Sending relevant updates or invitations (e.g., HR insights, events).

Legal basis: Consent or legitimate interest. You may unsubscribe at any time.

Processing special categories of data

- Only with explicit consent or when processing is necessary for legal claims or obligations.

Legal basis: Articles 9(2)(a) or 9(2)(f) GDPR.

5. Data sharing and international transfers

We do not sell or rent your personal data.

We may share your data only when necessary with:

- Service providers (e.g., IT providers, cloud hosting) under strict confidentiality and data processing agreements.
- Clients, in the context of candidate selection or consulting assignments, always with transparency.
- Public authorities, only when legally required.

If data is transferred outside the European Economic Area (EEA), we ensure appropriate safeguards such as Standard Contractual Clauses (SCCs) or an adequacy decision in line with GDPR requirements.

6. Data retention

We retain personal data only for as long as necessary for the purposes outlined above, or to comply with legal obligations.

- Client and project files: up to 10 years for legal and tax purposes.
- Candidate data: typically 12 months; extended retention is based on explicit consent.

- Coaching data: retained according to the coaching agreement and for no longer than necessary.
- Financial data: up to 10 years as required by Belgian accounting law.

After the retention period, personal data is securely deleted or anonymised.

7. Your rights under GDPR

You have the following rights regarding your personal data:

- Right of access – obtain confirmation and a copy of your data.
- Right to rectification – correct incomplete or inaccurate data.
- Right to erasure – request deletion where legally permitted.
- Right to restrict processing – limit the use of your data.
- Right to object – to processing based on legitimate interest or direct marketing.
- Right to data portability – receive your data in a structured, commonly used format.
- Right to withdraw consent – at any time, without affecting prior lawful processing.

To exercise your rights, contact us at info@hrflowpartner.be.

You also have the right to complain with the Belgian Data Protection Authority:

<https://www.gegevensbeschermingsautoriteit.be>

8. Security measures

We implement appropriate technical and organisational measures to protect your personal data, including:

- Secure access controls and authentication
- Encryption and secure storage
- Regular backups and monitoring
- Confidentiality obligations for all collaborators and service providers

Despite these measures, no system can guarantee absolute security. We take all reasonable steps to reduce risks to an acceptable level.

9. Automated decision-making

We do not use automated decision-making or profiling that produces legal or significant effects on individuals.

10. Updates to this Privacy notice

We may update this Privacy Notice to reflect changes in our services, legal obligations, or data protection practices. The most recent version will always be available on our website.