

Privacy Policy

As part of our activity (organization of professional training), we collect personal data referring to you.

We pay special attention to protecting your data, whether you participate in or show interest in our training programs.

We have drafted a Privacy Policy to explain how we treat your data openly.

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A. SCOPE

Our Privacy Policy applies to all personal data we collect about you - with your prior consent - when you browse our website or participate in one of our information sessions or training programs.

Our Privacy Policy has been drafted under applicable data protection legislation (Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on protecting individuals concerning the treatment of personal data and the free movement of such data).

B. TREATMENT OFFICER

Nexum Group SRL 0739.563.335
Rue Emile Francqui, 11
1435 Mont-Saint-Guibert
Belgium
+32 10 86 19 00
Privacy@nexum.eu

C. CATEGORIES OF DATA

As part of our activity, we collect the following data :

- Contact data
- Professional data
- Behavioral data

D. PURPOSES OF THE TREATMENT

Regarding contact data

Your contact details allow us to include you in the NEXUM Community and thus give you access to information about the professional training we organize, send you NEXUM documentation, and subscribe to our newsletter and training programs.

Regarding professional data

Your professional data allows us to offer you products and services whose content aligns with your aspirations and career path, your actual and current needs.

Regarding behavioural data

Your behavioural data allows us to understand better your profile and habits and thus anticipate your needs.

E. DURATION OF DATA CONSERVATION

Your data is kept strictly for the duration required, i.e.:

- when you participate in our training programs for a period equal to the lifetime of your professional e-mail address.
- when you show interest in our services : 3 years as of December 31 following your absence of reaction to our messages.

At the end of these retention periods, we delete these data.

F. RECIPIENTS OF DATA

To optimize the quality and the relevance of our products and services, we may call - for specific activities - upon third parties specialized in their field (communication, our website management, activities on social media, management and enrichment of our database).

All of these subcontractors are listed in a log of processing activities that we maintain internally. A full list is provided in appendix 1

We carefully choose all our subcontractors and ensure they meet the exact data protection requirements as the ones we offer you (including if our subcontractors are located outside of the European Union).

To this end, we sign with each of our subcontractors a contract stating, in particular, their obligations regarding protecting personal data.

In any case, it is understood that your data will never be sold.

G. DATA UPDATE

To update our database, we will erase or rectify any data referring to you which would prove inaccurate.

H. PROTECTION OF YOUR DATA

We guarantee that all technical, organizational and human measures (firewalls, personal passwords, verification system, limited access to files ...) are taken to ensure the protection of your data (especially against loss, abuse, access, unauthorized modification and destruction).

Our data's storage mode, security, and confidentiality measures are specified in a register of processing activities developed and maintained internally.

In case of a breach of your personal data, we will notify the Data Protection Authority as soon as possible and, if possible, not later than 72 hours after becoming aware of it.

You remain, however, solely responsible for the security and the confidentiality of your login data (username, password, ...).

In case of theft or misuse of your login data, please inform us immediately by e-mail at the following address: Privacy@nexum.eu.

I. YOUR RIGHTS

Under the applicable legislation, any person involved in the processing of personal data has the right to:

- access its data and retrieve its data as a copy (easily usable and allowing data portability)
- request deletion of its data
- modify inaccurate or incomplete data
- request a limited use of its data
- refuse the processing of its data, including processing for direct marketing purposes

We invite people who wish to claim their rights to e-mail Privacy@nexum.eu.

Claims will be processed as soon as possible and, in any case, within one month of receipt of the request.

We would also like to point out that any person involved in the processing of personal data has the right to lodge a complaint with the Data Protection Authority if they consider that the processing of their data constitutes a violation of the applicable law regarding data protection.

J. MODIFICATION OF OUR PRIVACY POLICY

Our Privacy Policy may be amended to ensure compliance with the provisions of the GDPR.

We invite you to check our website regularly for the latest version of our Privacy Policy.

Last modification date: February 18, 2020

Appendix 1: Nexum’s List of Sub-Processors used for Standard Business Operations

This list applies to Nexum and the Nexum companies and is subject to Nexum’s ongoing review which may be updated from time to time. You can download a PDF version here. Nexum uses the following third-party sub-processors to help us provide our Services to you. These sub-processors process data that you provide to us and have contractually agreed to protect such personal data in accordance with applicable data privacy regulations and standards.

1. Key Sub-Processors

Sub-Processor	Description of Services	Transfer of Personal Data Applies To	Location of Data Storage
Microsoft Corporation (Microsoft Azure, Office 365 including Teams, Dynamics)	Cloud services, email and file storage Teams - online communication platform used to deliver virtual training courses and workshops, and other meetings	All those who engage with Nexum	EU
Credly	Digital badges and credentials	All training and workshops (onsite and virtual delivery)	US
Poll Everywhere	Poll and survey platform used for live training and consultancy engagement with clients.	Any Polls where the data subject answer with personal data.	US
Pleo	Internal platform for reimbursement and employee credit-cards.	Non-sensitive personal data may occur in rare occasions in relation to reimbursement processes.	EU
ClickDimension	Nexum’s Marketing Module.	Registration and sign-ups to training, whitepaper and other website resources.	EU
Momentive Europe UC (Survey Monkey)	Surveys for participants feedback	All training and workshops (onsite and virtual delivery)	US
Discovery	Personality assessment platform, which profile the Data Subject.	Insights profiled, as well as answers used for making the assessment.	UK

Zenger Folkman	Coaching and Consultancy tool, used for the product of “Extraordinary Leader,” “Extraordinary Performer” and “360 assessments”	All assessment and coaching sessions.	US
Prosci, Inc.	Prosci change management training courses and workshops	All Prosci training and workshops (onsite and virtual delivery)	US

2. Ancillary Sub-Processors

Sub-Processor	Description of Services	Transfer of Personal Data Applies To	HQ Location
Stripe Payments, Ltd	Payment processing platform	Any individual, sole trader or organisation making Credit cards payments to Nexum	US
Zoom Video Communications, Inc.	Online platform used to deliver virtual training courses and workshops, and other meetings	Virtual training and workshops where Zoom is used as the online classroom environment	Germany
Clockify	Time registration tool for Nexum employees.	Potential registration related to time entries supplied to the customer for Consultancy services.	Germany
Google Analytics	Web analytics service providing insights into website traffic and user behavior for optimization of the website user experience and marketing purposes.	Any people who interacting with the website. Google Analytics primarily collects anonymized data about user interactions with a website, but it can include details such as IP address, user location, device type, browser type, session duration, pages viewed, referral sources, and interactions with content. This data is aggregated and doesn't identify individual users unless during registration and sign-ups to training or when downloading resources like whitepapers, webinar replays, ...	US

Google Ads	Online advertising platform provided by Google enabling to create and manage digital advertising campaigns across various Google-owned properties and a network of partner websites and apps.	Any people interacting with the ads and the website. This data is anonymized and doesn't identify individual users unless after acceptance of cookies and prior registration and sign-ups to training or when downloading resources like whitepapers, webinar replays, ...	US
Linkedin pixel	The LinkedIn pixel is a tracking and analytics tool provided by LinkedIn, a subsidiary of Microsoft. The LinkedIn pixel is primarily used by advertisers and website owners to measure and optimize the performance of advertising campaigns on the LinkedIn platform (measuring conversions or returned visits)	Any people who interacting with the website. This data is aggregated and doesn't identify individual users unless during registration and sign-ups to training or when downloading resources like whitepapers, webinar replays, ...	US
Dataceed	Data intelligence platform designed to securely store and manage various sources of analytics data to generate comprehensive understanding of customer sentiment and behavior and ultimately lead to more informed decisions about digital service improvement.	Any data collected through other sources listed above and like digital interactions (sources: advertising and analytics tools), personal data (sources: CRM, reviews, referral marketing,...).	EU

3. Successful Job Applicants & Employee Only Sub-Processors

Nexum utilizes other third-party contractors and suppliers including but not limited to suppliers whose platforms we use to support the delivery of our services, employment verification providers, criminal record check providers, benefit providers, travel providers, banks and external business advisors, such as lawyers, accountants and auditors. If you require any further information or have any questions regarding your personal data, our sub-processors and/or our processes, please contact our Data Protection Officer or if you are an employee, you can contact your HR Manager.