

# PRIVACY POLICY OF THE NXUS SERVICE

The purpose of this Privacy Policy is to give you an overview of how your personal data is managed by Nxus and to inform you on the measures we have taken and the policy we have in place to ensure the highest possible level of privacy and protection of your personal data.

It is intended to inform you about the processing and management of any personal data you provide us with, the reasons why we collect it and how we ensure its security. If, after reading this document, you still have questions, you can email us at [support@nxus.eu](mailto:support@nxus.eu) and we will happily respond.

Firstly, we would like to inform you that this Privacy Policy has been written in accordance with the applicable law. In order to provide you with the highest level of transparency and protection, we have stipulated provisions that are fully compatible with the principles of the EC Regulation No. 2016-679 of 27 April 2016 on general data protection, which came into force on 25 May 2018, and which is applicable in all European countries.

## **1. General overview**

To make this Privacy Policy easier to read, the term "Nxus Service" or the "Service" shall refer to the website <https://www.nxus.nl/> and its subdomains hosting the services we offer, as well as to other (future) Nxus applications.

The Nxus Service is the exclusive property of NexusBay B.V. ("Nxus"), a limited company ("Besloten Vennootschap") with a board of directors, the registered office of which is at Scheimel 8, 1261 VD, Blaricum, the Netherlands, registered with the Chambre of Commerce under the number 72707968.

Through this Service, Nxus offers an integrated ecosystem dedicated to the educational and professional development of any student or graduate or alumna or alumnus who has registered on the Service (a "Member"). That Service may also be accessed directly from partner educational institutions (the "Institutions") equipped with Nxus's Career Central, offering additional features and exclusive content, managed by each Institution through specifically authorised representatives (the

“Administrators” of the Institution). Additionally, the Service offers companies (the “Companies”) the ability to post job opportunities, company profiles and career events on the Service, in order to better source and hire talented students and alumni.

The main modules of the Service are the following:

- Internship Opportunities module: for students to search, access and apply to internship opportunities provided by partner Companies of either Nxus or their Institution (where their Institution has a Career Central);
- Job Opportunities module: for students and alumni to search, access and apply to job opportunities provided by partner Companies of either Nxus or their Institution (where their Institution has a Career Central);
- Company Profiles module: for students and alumni to browse, discover and follow company profiles of partner Companies of either Nxus or of their Institution (where their Institution has a Career Central);
- Career Events module: for students and alumni to search, access and apply to career events (recruitment sessions, competitions, challenges, live chats etc.) organised by partner Companies of either Nxus or their Institution (where their Institution has a Career Central);
- Career Appointments module: for students and alumni to apply to and to manage appointments with career coaches of partner Companies as organized by their Institution (where their Institution has a Career Central and has activated this module) or by Nxus or by other Nxus partners.

Nxus is the data controller of any personal data you have provided us with during your use of the Service.

Other parties might be involved with processing your personal data during your use of the Service as follows:

- Partner companies are responsible for data processed as part of any recruitment process for jobs or internships they set up and/or

recruitment events they organise. They are therefore the natural recipients of data from Nxus as regards applications to job- or internship opportunities or recruitment events.

- Institutions equipped with Nxus's Career Central are responsible for data processing as regards their students and alumni in relation to their studies. They are also the recipients of data describing the activity of their students and alumni on their Career Central.

Each body collects and processes data in accordance with the applicable law, subject to its own responsibility.

## **2. Scope of this Privacy Policy**

Nxus offers several categories of user accounts, each associated with specific services:

- The Member Account is for students and graduates who are searching for a job, internship, work-study offer, information about professions and companies, and recruitment advice, etc.;
- The Alumni Account is for alumni who are searching for alumni related information such as coaching support possibilities, information about activities for alumni, educational support possibilities, training, etc.;
- The Institution Account is for any higher education institution offering a career space to its students in the form of a version of the Website presented in its colours and equipped with exclusive content and additional functionality (the Career Central). It is co-managed by specifically authorised representatives of the institution (the “Administrators”);
- The Company Account is for any individual posting a job, internship or work-study opportunity (a Job Opportunity) on the Service. That individual makes a commitment in the name of and on behalf of the legal entity they represent and whose Opportunity they are publishing. The Company Account is therefore only for any legal entity or public body that wishes to post its activities, professions, career events and/or Job Opportunities on the Service.

This Privacy Policy applies to the personal data we collect from Members, Alumni, Companies and Administrators.

### **3. Information upon collection**

For the optimal running of the Service, we will ask you for some personal data.

When collecting this personal data, we will inform you of mandatory data using an asterisk (\*). All other data is purely optional.

In addition, where you give us personal data (by entering it on any Nxus form or by ticking a box or selecting buttons), you expressly consent to the collection and use of that information in accordance with the law and with this privacy policy.

For Students and Alumni related to an Institution where Career Central is running, parts of the personal data is provided or enriched by databases from the Institution.

### **4. Type of data collected**

Personal data we collect is data that personally identifies you such as information in relation to:

- your identity (mandatory): surname(s), first name(s), email address(es);
- your professional profile:
  - for Students and Graduates: education institution attended, desired position or internship, job or internship opportunities for which you have applied, your profile and your search criteria, career events for which you have registered, employer history;
  - for Alumni: educational activities, coach trajectories or other forms of support given or desired to provide, all based on active opt-in for publishing and collecting this information;

- for Companies: the data of the company you represent, your professional email address and telephone number(s), the profiles you are looking for;
- for Administrators of Institutions: the name of the Institution you represent, your position;

In addition, we will also collect the computer logs of your connection to our website (IP address, date and time of connection).

## **5. Purposes of data processing**

The personal data you provide to us is intended to:

- for student or graduate Members: facilitate your professional development using our Service. This includes the ability to apply for job and internship opportunities, to apply for recruitment events, to be viewed by companies (when you give your consent and based on match) and to receive automatic, customised email alerts about opportunities and career events that meet your criteria;
- for alumni Members: facilitate your professional development using our Service. This includes the ability to apply for coaching and mentoring opportunities, to apply for alumni events or trainings, to be viewed by other alumni or other Members (when you give your consent and based on match) and to receive automatic, customised email alerts about opportunities and events that meet your criteria;
- for student or graduate or alumni Members accessing the Career Central of their Institution, when the Institution has decided to access to this information: allow, in addition to the above, the Administrators of the Institution to support you more effectively in your professional development efforts by accessing your profile and your activity on the Service (applications to Job Opportunities or to career events);
- for Administrators of the Institution: support the students and alumni of your Institution in their professional development efforts as well as to nurture and activate the alumni population;
- for Companies: promote your company and publish job and internship opportunities as well as receive promotional information

from an Institution (in the case of an account associated with a Career Central) or from Nxus (in the case of an account associated directly with Nxus);

- in general: contribute to an anonymised data pool used to report on the use of the Service (i.e. statistics) in order to develop new features.

In summary, the use of your personal data is intended to facilitate your access to the Service provided by Nxus and to guarantee use in accordance with your needs.

## **6. Recipients of the data**

The personal data provided may be viewed by our employees, any subsidiaries of Nxus, any auditors, or any sub-contractors of Nxus, strictly in accordance with the purposes described in Article 5 above, with non-disclosure agreements, and on a strict 'need-to-know' basis.

In addition, to participate in the ecosystem of the Nxus Service and to guarantee you the best possible service, you are hereby informed that your personal data may be forwarded to different parties involved in the Nxus Service, namely:

- Companies, as regards personal data about Members who apply for their Internship and Job Opportunities or career events, or who have chosen to publish their profile on the Service;
- The Institution concerned and its Administrators, as regards the personal data of Members and Companies who connect via a Career Central.

Regarding this latter point, we would like to remind Members that if they do not wish to authorise the transmission of their data to their Institution but wish to still benefit from the Nxus Service (minus any private content posted on the Career Central of their Institution), they can simply open a Member account directly on our public website or future Nxus applications rather than through the Career Central of their Institution. This is an option (active opt-in) once the Member is graduated and once the educational e-mail address is no longer functional.

To allow the registration and effective support of the students and alumni of an Institution as part of their professional development efforts, the Institution may be required to provide us with some limited personal data to allow us to pre-fill the registration form or to update their data within the Career Central. Upon the creation of their Member account, those students and alumni are informed of the data transfer, send their data to us directly by confirming or amending it, and agree to the terms of this Privacy Policy for Members. This transmission of data only happens when the connection to the Career Central is managed by an authentication system provided by the Institution.

The Service is also used by Companies and Administrators as part of their professional activity. Transfers of data are stipulated to be necessary for the satisfactory operation of the service subscribed to by their respective employers.

## **7. Storage period**

As part of the service we offer, we are required to store the content that Users publish on Nxus, regardless of whether this is as Members (Profiles etc.), Administrators or Companies. As Dutch law requires us to do, we will store the identification data of the persons publishing such content (IP address, date and time of connection, pages viewed etc.) for a period of one year.

In addition, data establishing evidence of a right or contract, which must be stored in compliance with our legal obligation, shall be stored for the period stipulated by the applicable law.

Except for those legal requirements, your personal information will not be stored beyond the period strictly necessary, i.e. for the whole period of use of our services via your account up to the closure of your account. You can instantly close your account by yourself by clicking on the link which can be found in the “My Account” menu on the Service.

As regards the personal data of Members, Members are informed that such data will be stored for a maximum of two years following their last connection to the Service. Therefore, if you do not delete your account but do not use it, your personal information will be stored for up to two years.

We will contact you at the e-mail address or addresses you have provided both a few weeks before the end of that two year period as well as on the

day of termination to enquire whether you wish to keep or delete your account.

At the end of those timeframes and following the effective closure of your account, your data will be irremediably anonymised. It will then be used exclusively for statistical purposes (analysis of the frequency of use of the Service's features, statistical analyses of applications in response to published offers etc.).

As regards the data of deceased persons, subject to Nxus being informed, that account will be closed and their data permanently anonymised, unless Nxus is given any other specific instruction.

## **8. Security and privacy**

We have taken all appropriate organisational and technical measures and all necessary precautions to preserve the security of the information described above, in particular from accidental loss, distortion, alteration and unauthorised access, use, modification and disclosure. We will ensure the integrity and availability of the data we are required to process at all times.

To do this, we use carefully selected specialised technical service providers to ensure, in relation to data processing, the security, protection, preservation and recovery of the data entrusted to us.

In contractual terms, in addition to strict confidentiality obligations, the appropriate contractual clauses that bind us to those providers have been written in order to comply with the legal principles governing the hosting of personal data. Regarding this, data processing and the hosting of data takes place within the European Union, specifically in the Netherlands.

At a technical level, a set of strict, appropriate technical procedures and devices allow us to:

- ensure restricted access to data through access control and strict authentication processes;
- prevent cases of data piracy;
- implement an effective encryption of the data, in particular during its transmission through the use of SSL encryption;
- guarantee the physical security of the information processed.



The information is stored on secure servers.

Finally, we incorporate the protection of personal data throughout the internal organisation of Nxus. Clauses to ensure the effective protection of the personal data to which they may have access are written into the employment contracts of employees, and a charter, which strictly regulates the use of the resources of Nxus's information system, has been appended to our company rules and regulations.

## **9. Terms and exercise of rights**

In accordance with the standards set out by the Dutch Protection Authority "Autoriteit Persoonsgegevens" (AP) you have a right to access, correct, update and delete your personal information. If your request concerns personal data processed by your Institution or data which you have decided to send to Companies via Nxus (Profiles, etc.) - as part of an application, for example - please contact them directly according to the methods stipulated by that Institution or those Companies regarding the collection or the use of your data. If your request concerns data collected or processed by Nxus, you can exercise your rights by writing to us, stipulating "Data Protection" in the letter subject, or by emailing [support@nxus.eu](mailto:support@nxus.eu).

As required by law, we will then ask you for proof of identity to ensure that you are the owner of the data concerned in the request.

In accordance with the provisions of the AP, you may also refuse to allow us to process your data, provided you have a legitimate reason.

We will do our best to answer your queries regarding the processing of your personal data. If you are not satisfied with the responses provided, you may, if you wish, make a complaint to the AP according to the terms stipulated on its website ([https:// www.autoriteitpersoonsgegevens.nl/](https://www.autoriteitpersoonsgegevens.nl/)).

In addition, we would also like to inform you that you are required to comply with the aforementioned standards of the AP, the breach of which is liable to criminal penalties. In the case where, for example, you wish to send us personal information on behalf of a third party, you will have to act in accordance with the law as regards such data.

In particular, you must refrain from any collection, misuse and, in general, from any act likely to infringe privacy or personal reputation as regards the personal information to which you have access.

## **10. Amendment of this Privacy Policy**

If we make substantial changes to the content of this Privacy Policy, those changes will be announced via a notice visibly displayed on the Service and/or sent to the email address you provided at the time of your registration (or which you have since updated, if applicable).

## **11. Use of cookies**

Cookies are text files, which are often encrypted and stored in your browser. They are created for a limited period when a user's browser loads a given website: the website sends information to the browser, which then creates a text file. Whenever the user goes back to the same website, the browser retrieves the file and sends it to the website's server.

The information stored by cookies includes the pages visited, the type of browser you use, your IP address and any information you have entered on a website to save you from entering it again.

For more information about cookies, please consult the AP's (the Dutch Data Protection Authority) information page.

To adapt the services offered by the website to visitors' requests, Nxus uses different cookies.

### Technical and functional cookies

These cookies ensure that the website is properly functioning and facilitate technical optimization. They are meant to:

- secure your connection, ensuring your identification on your personal account when and where appropriate;
- store your preferences and/or the display settings used;
- display a banner, when you first visit the website, informing you of the presence of cookies and giving you the option to accept or reject them.

### Audience measurement and web analytics cookies

These cookies allow us to measure the use of the Nxus Service and thus to establish anonymous attendance/visit statistics and information such

as the number of web pages viewed or the visitor's activity on the website (most often viewed pages and sections, offers consulted, browsing habits etc.).

For this purpose, we use the Google Analytics audience measurement tool. To understand more about how Google manages cookies, please visit the dedicated Google page:

<https://www.google.com/intl/en/policies/technologies/types/>, with the understanding that:

- the data collected is not cross-linked with other processing activity;
- the cookies deposited are only used to produce anonymous statistics;
- cookies do not allow us to track the web user's browsing habits on other websites.

### Advertising cookies

We may share information that we get through cookies with third party websites in order to measure web traffic or analyze traffic generated by an online advertising campaign.

You can set your browser software to notify you of the presence of cookies and to give you the option of accepting or rejecting them. You can accept or reject cookies on a case-by-case basis or reject them once for all websites. Rejecting all at once is likely to modify your access to the services of any website requiring the use of cookies. The setting of cookies is different for each browser and is generally described in the help menus.

## **12. Social networks used by the users of the Service**

Our Service may include buttons allowing the user to share our website's content as well as his/her opinion via social networks. These buttons can include, in particular, "Share", "Like", or "Tweet" from Facebook, Twitter etc.

As soon as you are connected on your device to the social network concerned, those buttons can identify you, even if you do not use them when you browse our website. Furthermore, if you use them while connected to those social networks, for example by clicking on the "Like" button or by writing a comment, the corresponding information will be transmitted to the social network and published on your profile. Please

consult these networks' privacy policies to inform yourself of the intended use of the data collected through these buttons - in particular advertising, browsing information etc.

If you do not wish social networks to identify you or to link data collected through our website to your user account, you must log out of the social network before logging in to our website.

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