

Privacy Policy – GDPR (AVG) Compliance – Frontwise

1. Introduction

Frontwise Europe B.V. (company ID 89780094) located in Utrecht, The Netherlands and Frontwise Group D.O.O.E.L. (company ID 6990410), located in Skopje, Republic of North Macedonia are committed to protecting and respecting your privacy and ensuring that personal data is processed in compliance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and applicable national data protection laws. Both entities will be referred as FW in this document.

This Privacy Policy explains how FW collects, uses, stores, and protects personal data in the context of our recruitment and talent acquisition services.

2. Data Controller

FW acts as the data controller for the personal data processed under this policy.

Contact details:

Email: dataprotection@frontwisegroup.com

3. Personal Data FW Collects

FW may collect and process the following categories of personal data:

- Identification data (name, job title)
- Contact details (email address, phone number)
- Professional information (CV, employment history, skills, qualifications)
- Publicly available professional profile data (e.g., LinkedIn or similar platforms)
- Communication records between you and our consultants

FW does not intentionally collect special categories of personal data unless you provide them voluntarily.

4. How FW Collects Personal Data

FW collects personal data when:

- You apply for a vacancy
- You contact us directly (email, website, social media)
- FW sources your profile from publicly available professional platforms
- You provide your CV or other information to our consultants

5. Legal Bases for Processing

FW processes personal data based on one or more of the following legal grounds:

- Consent (Article 6(1)(a) GDPR)
- Performance of a contract or steps prior to entering into a contract (Article 6(1)(b))
- Legal obligation (Article 6(1)(c))
- Legitimate interests related to recruitment services

(Article 6(1)(f))

You may withdraw consent at any time without affecting the lawfulness of processing before withdrawal.

6. Purpose of Processing

FW processes personal data to:

- Match candidates with job opportunities
- Communicate about vacancies and recruitment services
- Present candidate profiles to potential employers with consent
- Maintain internal records and comply with legal obligations

7. Sharing Personal Data

FW may share personal data with:

- Clients and prospective employers (with your consent)
 - Service providers acting as data processors (e.g., CRM providers)
 - Public authorities when legally required
- FW ensures that appropriate data processing agreements are in place with all processors.

8. International Data Transfers

If personal data is transferred outside the European Economic Area (EEA), FW ensures appropriate safeguards such as Standard Contractual Clauses (SCCs) or equivalent legal mechanisms are in place.

9. Data Retention

FW retains personal data only as long as necessary:

- Up to 30 days without consent
 - Up to 12 months with consent for recruitment purposes
- After this period, FW will request renewed consent or securely delete/anonymize the data.

10. Data Security

FW implements appropriate technical and organizational measures to protect personal data against unauthorized access, loss, misuse, or disclosure. Access is restricted to authorized personnel only.

11. Data Breach Notification

In the event of a personal data breach, FW will notify affected individuals and relevant supervisory authorities within the timelines required by GDPR (where applicable).

12. Your Rights Under GDPR

You have the following rights:

- Right of access
- Right to rectification
- Right to erasure (“right to be forgotten”)
- Right to restrict processing
- Right to data portability
- Right to object

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- Right to withdraw consent
 - Right to lodge a complaint with a supervisory authority
- To exercise your rights, contact:
dataprotection@frontwisegroup.com

13. Automated Decision-Making

FW does not use automated decision-making or profiling that produces legal or similarly significant effects.

14. Complaints

If you believe your data protection rights have been violated, you have the right to lodge a complaint with your local data protection supervisory authority.

15. Changes to This Policy

FW may update this Privacy Policy from time to time. The latest version will always be available upon request or on our website.