



## PRIVACY NOTICE

### 1. IMPORTANT INFORMATION AND WHO WE ARE

Highlight Consulting is committed to respecting your privacy and protecting your personal data. This privacy notice, together with our *Terms of Use* and any other documents referred to in it, informs you how we collect and process your personal data, including through your use of our website, regardless of where you visit it from. This privacy notice also tells you about your privacy rights and how the law protects you.

#### Controllers

The company Highlight Consulting Luxembourg S.à r.l. (incorporated in Luxembourg with registration number B263111), with registered offices at 21, rue Glesener L-1631 Luxembourg (Luxembourg), is data controller (i.e. the organisation which determines why and how to process personal data), within the meaning of and in accordance with applicable data protection laws, including but not limited to, the European General Data Protection Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "GDPR"), and covers two brands: Highlight Consulting and Be Mindful.

This privacy notice is issued on behalf of Highlight Consulting Luxembourg S.à r.l., so when we mention « **Highlight** », « **we** », « **us** » or « **our** » in this privacy notice, we are referring to Highlight Consulting Luxembourg S.à r.l. as data controller for your personal data.

#### Concerned data subjects

Under the GDPR, data subjects mean natural persons whose personal data is being processed. For the purpose of this Privacy Policy, data subjects on whom Highlight collects and processes personal data may include, but are not limited to, the following categories of individuals:

- Clients (being individuals) or representatives, employees and contact persons related to companies being clients;
- Candidates to assessments centers, coaching sessions, or any other service provided by Highlight;
- Representatives, employees, contact persons and any other individuals related to Highlight's service providers and commercial partners;
- Visitors of our website;

- Any other individual having or who had interactions with Highlight.

Individuals under an employment, student or trainee contract with Highlight, job applicants and individual consultants do not fall within the scope of this Privacy Policy and are covered under Highlight's internal Human Resources Privacy Policy.

### Who we are and what we do

Highlight Consulting is a human resources and leadership consulting company located in Luxembourg. For more information, visit [www.Highlight.lu](http://www.Highlight.lu)

Be Mindful delivers mindfulness-based leadership development programs, mindfulness initiation workshop and the MBSR Program. For more information, visit [www.bemindful.lu](http://www.bemindful.lu).

### Contact details

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact Highlight Consulting using the details set out below:

Full name of legal entity: Highlight Consulting Luxembourg S.à r.l.

Names of data privacy contacts: Séverine Barbette

Email address: [privacy@Highlight.lu](mailto:privacy@Highlight.lu)

Postal address: 21, rue Glesener L-1631 Luxembourg

### Informing us of changes

It is important that the personal data we hold about you are accurate and updated. Please keep us informed if your personal data changes during your relationship with us.

### Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. THE DATA WE MAY COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include anonymised data.

We may collect, use, store and transfer different kinds of personal data about you depending on the relationship we have with you. We process the following categories of personal data:

- **Identity Data** may include your first name, maiden name, last name, username or similar identifier, marital status, title, job title, date of birth, gender;

- **Contact Data** may include your billing address, delivery address, email address, telephone numbers, job title;
- **Financial Data** may include bank account and other payment related information;
- **Technical Data** may include your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website;
- **Profile Data** may include your username and password, your interests, preferences, feedback and survey responses;
- **Usage Data** may include information about how you use our website, products and services;
- **Marketing and Communications Data** may include a record of your preferences in receiving marketing from us and your communication preferences;
- **Health and Psychological Data** may include your Identity Data, Contact Data, and whether or not you have or have had health problems requesting a psychotherapy like addictions, depression, burn out, schizophrenia, deficit of attention, post-traumatic disorders, dissociations, panic attacks, hallucinations etc. We also may collect information about food and sleep habits, current medication, past surgeries and family context;
- **Career Data** may include your CV, a link to your LinkedIn Profile, a summary of your main career steps, questions about your career and motivational drivers (Skills Assessment etc.);
- **Personality Data** may include motivational and personality questionnaires reports, reasoning ability tests reports, Assessment and Development Center reports, 360° feedback reports, Interview reports etc;
- **Contextual Data** may include all the notes that our coaches or consultants might take during individual sessions (coaching, career counseling, skills assessments etc.). These notes may include information about your family, work, health, social, emotional, psychological context;
- **Other Special Categories of Personal Data** may include details that you voluntarily share with us about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership;
- **Cookies.** A cookie is a small text file stored on the hard drive of your computer or in your browser memory when you visit our website. This file asks permission to be placed on your device. Once you agree (or your browser agrees automatically if it is set it up in that way), this file is added in your device. Highlight uses cookies that may contain personal data as the case may be. Use of cookies helps us to make our website usable, as well as to improve our website and to deliver a better and more personalized service by enabling us to, for example: (i) make statistics, estimate our audience size and usage patterns; (ii) store information about your preferences, allowing us to customize our website according to your individual interests; and (iii) recognize you when you return to our website and know what parts of the website you visit, your preferences and what is most relevant to you;

We use the following types of cookies on our website:

- Necessary cookies. Which help make our website usable by enabling basic functions like page navigation and access to secure areas of our website (e.g. these preserve your user states across page requests or store your user's cookie consent state for the website);
- Preferences cookies. Which help us remember some of your preferences such as the language used on the website;
- Statistics cookies. Which help us to understand how you interact with the website (e.g. these enable us to identify that the same person is moving from page to page and also enable us to offer you an enhanced user experience when you return to our website). We store and collect a unique ID to track your session from page to page via session cookies.

Most browsers are initially set up to accept cookies. However, you can reset your browser to refuse all cookies or indicate when a cookie is being sent. You will need to consult the help area of your browser application for instructions. If you choose to disable your cookies setting or refuse to accept a cookie, some parts of our website will not function properly or may be considerably slower. Unless you have adjusted your browser setting so that it will refuse cookies, your system will continue to accept cookies when you direct your browser to our website. Accepting cookies means that you permit communication between your computer and our website as described in this section.

We also use cookies implemented by third parties such as:

You are free to consent or not to the use of these third-party cookies through a banner that will appear on your screen.

For more information on the privacy practices of the above third parties, please refer to the respective privacy policies of these third parties accessible on their websites.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Some types of personal data are considered under the GDPR as special categories of data or "sensitive" personal data. This includes personal data listed above under the categories "Health and Psychological Data" and "Other Special Categories of Personal Data". For these categories of personal data, we will always collect your prior consent before processing the data. Where we have relied on such consent to process your personal information, you always have the right to withdraw consent at any time. However, in this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

### 3. HOW WE COLLECT YOUR PERSONAL DATA

We collect data about you through a variety of different methods, including:

#### *Direct interactions.*

You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email, work sessions, assessments and coaching sessions or otherwise, including when you:

- apply for or enquire about our products or services;
- enter into any agreement with us;
- participate to one of our Assessment Center, coaching session, career counselling, training, or any other service provided by Highlight.;
- create an account on our Website or contact us through our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- give us some feedback; or
- log-in to a secure area of our Website (Learning Square or Candidate Area);
- otherwise meet or interact with somebody from our team and exchange contact details.

#### *Employer interactions.*

We may receive personal data from your employer (being our client) via the HR dept., Learning & Development department, Talent Management department, team leaders or people managers, administrative and coordination staff etc., when we:

- prepare and coordinate projects, send invitations, send meeting requests;
- send preparation work and post work material in the context of trainings;
- prepare attendance lists for trainings, coachings, workshops and other events;
- send tests and questionnaires;
- send evaluation forms;
- log-in to a secure area of our Website (Learning Square or Candidate Area).

#### *Automated technologies or interactions.*

As you use our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our section above related to Cookies for further details.

### *Third parties or publicly available sources:*

We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following sources:
  - (a) analytics, advertising or search information providers such as Google based outside the EU;
  - (b) advertising networks such as Google Ads based outside of the EU;
- Identity and Contact Data from publicly available sources such as Editus in Luxembourg, LinkedIn profile, etc.

Please contact us if you have any questions regarding the source of your personal data or would like more detail than is set out in this privacy notice.

## 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- ***Performance of contract*** - we process your personal data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- ***Comply with a legal or regulatory obligation*** - we process your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- ***Legitimate interest*** - we process your personal data where it is in the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience.
- ***Consent*** - you have given your consent to the processing of your sensitive personal data for the specific purposes described below.

You have the right to

### **Purposes for which we will use your personal data**

We have set out below a description of all the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also identified what our legitimate interests are, where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please contact us at [privacy@Highlight.lu](mailto:privacy@Highlight.lu) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
To register you as a new customer, candidate (assessment and development centres, tests and questionnaires) or participants (trainings, coachings, skills assessments, workshops)	(a) Identity  (b) Contact	(a-b) Performance of a contract with you or a third party (e.g. your employer)
To process and deliver Individual Coachings, Skills Assessments, Career counselling	(a) Identity  (b) Contact  (c) Financial*  (d) Career  (e) Personality  (f) Contextual  (g) Profile  (h) Usage  (i) Health and Psychological Data  (j) Other Special Categories of Personal Data	(a-b) Performance of a contract with you or a third party (e.g. your employer)  (c) Necessary for our legitimate interests (to recover debts owed to us) * Applicable if you contract directly with us  (d-e-f) Performance of a contract with you or a third party (e.g. your employer)  (f) Necessary for our legitimate interests (notably to be able to enforce or defend our legal and contractual rights or to defend our interests in case of legal proceedings)  (g-h) Performance of a contract with you (notably to enable you to access Learning Square and the Candidate Area on our Website) or a third party (e.g. your employer) and necessary for our legitimate interests (to define types of customers for our products and services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)  (i-j) Consent

<p>To process and deliver Assessment and Development Centers (incl. feedbacks), tests and questionnaires, 360° feedback etc.</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Career</li> <li>(d) Personality</li> <li>(e) Contextual</li> <li>(f) Profile</li> <li>(g) Usage</li> <li>(h) Health and Psychological Data</li> <li>(i) Other Special Categories of Personal Data</li> </ul>	<p>(a-b) Performance of a contract with you or a third party (e.g. your employer)</p> <p>(c-d-e) Performance of a contract with you or a third party (e.g. your employer)</p> <p>(f) Necessary for our legitimate interests (notably to be able to enforce or defend our legal and contractual rights or to defend our interests in case of legal proceedings)</p> <p>(g) Performance of a contract with you (notably to enable you to access Learning Square and the Candidate Area on our Website) or a third party (e.g. your employer) and necessary for our legitimate interests (to define types of customers for our products and services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)</p> <p>(h-i-) Consent</p>
<p>To process and deliver Trainings, workshops, Team Buildings, Team Events, Team Coaching etc.</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Personality</li> <li>(d) Health and Psychological Data</li> <li>(e) Other Special Categories of Personal Data</li> </ul>	<p>(a-b) Performance of a contract with you or a third party (e.g. your employer)</p> <p>(c) Performance of a contract with you or a third party (e.g. your employer)</p> <p>(d-e) Consent</p>
<p>To process and deliver Mindfulness Based sessions and trainings</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Financial</li> <li>(d) Health and Psychological Data</li> <li>(e) Contextual</li> </ul>	<p>(a-b) Performance of a contract with you or a third party (e.g. your employer)</p> <p>(c) Necessary for our legitimate interests (to recover debts owed to us)</p> <p>(d-e-f) Consent (health data), Performance of a contract with you or a third party (e.g. your employer) and necessary for our legitimate interests (this type of data is notably required</p>



	(f) Other Special Categories of Personal Data	to identify any potential contraindications to the meditation practice)
To process and deliver HR Consulting (Performance Management, Competency profiling, Interim management, design of HR processes etc.)	(a) Identity (b) Contact	(a-b ) Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)  (d) your consent, performance of a contract with you and/or necessary for our legitimate interests (to keep you updated re. our products/services, send you offers, invitations etc.)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a-d) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)  (e) your consent and/or necessary for our legitimate interests (to keep you updated re. our products/services, send you offers, invitations etc.)

<p>To administer and protect our business and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary to comply with a legal obligation  (b-c) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p>
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