



## PRIVACY NOTICE

Last modified : 7 février 2023

### 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, informs you about how we collect and process your personal data, including through your use of our website, wherever you visit it from. This privacy notice also informs you of your data protection rights and how the law protects you.

#### Data controller

The company Highlight Consulting Luxembourg S.à r.l. (incorporated in Luxembourg under registration number B253111), whose registered office is located at 18, rue Randlingen L-8366 Hagen (Luxembourg), is the data controller (i.e. the organisation that determines why and how personal data is processed), within the meaning of and in accordance with applicable data protection laws, including, but not limited to, the European General Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (the "GDPR").

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 the controller of your personal data.

#### People involved

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

- | Customers (being natural persons) or representatives, employees and contact persons related to companies that are customers;
- | Applicants for assessment centres, coaching sessions, or any other service provided by Highlight ;
- | Representatives, employees, contact persons and any other persons connected with Highlight's service providers and business partners;
- | Visitors to our website;

- | Any other individual who has or has had interactions with Highlight.

Individuals on employment, student or trainee contracts with Highlight, job applicants and individual consultants are not covered by this privacy policy and are covered by Highlight's internal policy.

### Who we are and what we do

Highlight is a human resources and leadership consultancy based in Luxembourg. For more information, please visit [www.highlight.lu](http://www.highlight.lu).

Highlight also offers mindfulness-based leadership development programmes, introductory mindfulness workshops and MBSR programmes.

### Contact details

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

- | Full name of the legal entity: Highlight Consulting Luxembourg S.à r.l.
- | E-mail address: [privacy@highlight.lu](mailto:privacy@highlight.lu)
- | Postal address: 18, rue Randlingen L-8366 Hagen

### Inform us of changes

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

### Links to third parties

Our website may include links to third party websites, plug-ins and applications. Clicking on these links or enabling these 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 statement 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 individual can be identified. It does not include anonymous data.

We may collect, use, store and transfer different types 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, user name or similar identifier, marital status, title, function, date of birth, gender;
- | **Contact data** may include your billing address, delivery address, email address, telephone numbers, job title;
- | **Financial data** may include information about bank accounts and other payments;
- | **Technical data** may include bank account and other payment information;
- | **Profile data** may include your username and password, interests, preferences, feedback and survey responses;
- | **Usage data** may include information about how you use our website, products and services;
- | **Marketing and communication data** may include a record of your preferences for receiving our marketing offers 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 requiring psychotherapy such as addictions, depression, burn out, schizophrenia, attention deficit disorder, post-traumatic disorders, dissociations, panic attacks, hallucinations, etc. We can also collect information about eating and sleeping habits, current medication, past surgeries and family background;
- | **Career-related data** may include your CV, a link to your LinkedIn profile, a summary of your main career milestones, questions about your career and motivational factors (skills assessment, etc.);
- | **Personality data** can include reports from motivation and personality questionnaires, reasoning ability test reports, Assessment and Development Center reports, 360° feedback reports, interview reports, etc;
- | **Contextual data** can include any notes that our coaches or consultants may take during individual sessions (coaching, career guidance, skills assessments, etc.). These notes may include information about your family, your work, your health, your social, emotional and psychological background;
- | **Other special categories of personal data** may include details you voluntarily share with us about your race or ethnic origin, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership;
- | **Cookies.** A cookie is a small text file stored on your computer's hard drive or in your browser's memory when you visit our website. This file asks permission to be placed on your device. Once you accept it (or your browser accepts it automatically if it is set up that way), this file is added to your device. Highlight uses cookies, which may contain personal data as appropriate. The use of cookies helps us to make our website usable, as well as to improve our website and provide a better and more personalised service by enabling us, for example: (i) to compile statistics, estimate our audience size and usage

patterns; (ii) to store information about your preferences, enabling us to tailor our website to your individual interests; and (iii) to recognise you when you return to our website and to know which parts of the website you are visiting, your preferences and what is most relevant to you;

We use the following types of cookies on our website:

- Necessary cookies. They help make our website usable by enabling basic functions such as page navigation and access to secure areas of our website (for example, they preserve your user states across page requests or store your user's cookie consent status for the website);
- Preference cookies. These help us to remember some of your preferences, such as the language used on the website;
- Statistical cookies. They help us understand how you interact with the website (for example, they allow us to identify that the same person is moving from page to page and also allow us to provide you with an enhanced user experience when you return to our website). We store and collect a unique identifier to track your session from page to page via session cookies.

Most browsers are initially set to accept cookies. However, you can reset your browser to refuse all cookies or to 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 cookie settings or refuse to accept a cookie, some parts of our website will not function properly or may be considerably slower. Accepting cookies means that you allow communication between your computer and our website, as described in this section.

We use different types of cookies for different reasons:

TYPE OF COOKIE	PURPOSE	LIFETIME OF THE COOKIE	ACCESS BY THIRD PARTIES
<b>ESSENTIAL COOKIES</b>  <b>(STRICTLY NECESSARY)</b>  Necessary cookies are crucial to the basic functions of the website and the website will not	CookieYes sets this cookie to remember users' consent preferences so that their preferences are respected on subsequent visits to this site. It does not collect or store any personal information about site visitors.	1 year	CookieYes
	This cookie is used by the website's WordPress theme. It allows the website owner to implement or modify website content in real time.	never	Elementor

**Commenté [PwC Legal1]:** To be adapted according to the types of cookies used on the website (ask your webmaster for help in completing this table).

**Commenté [PwC Legal2]:** Is it a "session" cookie (which self-destructs when someone leaves the page)? Or is it a cookie that has a longer lifetime (e.g. cookie that holds a password for 1 year, etc).

**Commenté [PwC Legal3]:** In this column you have to indicate whether or not third parties have access to the cookies (e.g. Youtube uses cookies so that videos are displayed correctly on a website. In this case, Youtube has access to the cookies).

function as intended without them. These cookies do not store any personally identifiable data.			
<p><b>ANALYTICAL COOKIES</b></p> <p><b>(STATISTICS)</b></p> <p>Analytical cookies are used to understand how visitors interact with the website. These cookies help to provide information about the number of visitors, bounce rate, traffic source, etc.</p>	YouTube sets this cookie via embedded videos and records anonymous statistical data.	2 years	YouTube Consent
<p><b>THIRD PARTY COOKIES</b></p> <p><b>(ADVERTISERS)</b></p> <p>Advertising cookies are used to provide visitors with personalised advertisements based on previous page views and to analyse the effectiveness of the advertising campaign.</p>	The YSC cookie is set by Youtube and is used to track views of videos embedded in Youtube pages.	session	YSC
	A cookie set by YouTube to measure bandwidth that determines whether the user gets the new or old player interface.	5 months 27 days	YouTube Visitor_Info1_live
	YouTube sets this cookie to store the user's video preferences when using an embedded YouTube video.	never	YouTube Yt-remote-device-id
	YouTube sets this cookie to store the user's video preferences when using an embedded YouTube video.	never	YouTube Yt-remote-connected-devices
	This cookie, set by YouTube, records a unique ID to store data about the YouTube videos the user has viewed.	never	YouTube Yt.innertube::requests
	This cookie, set by YouTube, records a unique ID to store data about the YouTube videos the user has viewed.	Never	YouTube Yt.innertube::nextId

OTHER COOKIES			
Other unclassified cookies are those that are currently being analysed and have not yet been classified.	No description	Session	Htmmove_has _count-2278
	No description	session	Wp- wpm_l_curren t-language
	No description	session	Htmmove_has _count-3149
	No description	5 months 27 days	Device_info
	No description	session	Htmmove_has _count-4654
	No description	Session	Htmmove_has _count-1658
	No description	session	Htmmove_has _count-3130
	No description	session	Htmmove_has _count-2850
	No description	session	Htmmove_has _count-98
	No description	session	Htmmove_has _count-5327
	No description	session	Htmmove_has _count-5328
	No description	session	Htmmove_has _count-5326

	No description	session	Htmove_has _count-5324
	No description	session	Htmove_has _count-5207
	No description	session	Htmove_has _count-5323
	No description	session	Htmove_has _count-5338

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

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

We may also collect, use and share Aggregate Data such as statistical or demographic data for any purpose. Aggregate Data may be derived from your Personal Data but is not considered Personal Data at law because it 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 the Aggregated Data with your personal data in such a way 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.

Certain types of personal data are considered under the GDPR as special categories of data or "sensitive" personal data. This includes the personal data listed above under the categories of "Health and psychological data" and "Other special categories of personal data". For these categories of personal data, we will always obtain your prior consent before processing the data. Where we have relied on this consent to process your personal data, you always have the right to withdraw your consent at any time. However, in this case we may have to cancel a product or service you have with us, but we will inform you at the time. Where we are required by law or the terms of a contract we have with you to collect personal data and you do not provide that data when requested, we may not be able to perform the contract we have entered into or are trying to enter into with you (for example, to supply goods or services to you). In this case, we may have to cancel a product or service you have entered into with us, but we will inform you at the time.

### 3. HOW WE COLLECT YOUR PERSONAL DATA

We collect data about you in a number of ways, including

#### Direct INTERACTIONS

You may provide data by filling in forms on our site (for example by subscribing to our mailing list via our contact form) or by communicating with us by post, telephone, email, work sessions, assessments and coaching sessions or otherwise, including when you :

- | make a request or inquire about our products or services;
- | enter into a contract with us;
- | participate in one of our Assessment or Development Centres, coaching sessions, career guidance, training or any other service provided by Highlight;
- | contact us via our website;
- | subscribe to our services or publications;
- | request that commercial information be sent to you;
- | participate in a competition, promotion or survey
- | send us your comments; or
- | log in to a secure area of our Learning Space;
- | meet or interact with a member of our team and exchange contact details.

#### **INTERACTIONS with the employer**

In order to provide our services, we may receive personal data about you from your employer (who is our client) through the Human Resources Department, Training and Development Department, Talent Management Department, Team Leaders or Personnel Managers, Administrative and Co-ordination Staff, etc., when we :

- | prepare and coordinate projects, send invitations, send meeting requests;
- | send preparation and follow-up material for training courses;
- | prepare attendance lists for training, coaching, workshops and other events;
- | send out tests and questionnaires;
- | send out evaluation forms;
- | We connect to a secure area of our website (Learning Area or Candidate Area).

#### **Automated technologies or interactions**

When you use our website, we may automatically collect technical data about your equipment, actions and browsing habits. We collect this personal data using cookies, server logs and other similar technologies. Please see our section above on cookies for more details.

#### **Third parties or public sources**

We may receive personal data about you from a variety of third parties and public sources, as indicated 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 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 about the source of your personal data or if you would like more details than are set out in this privacy notice.

#### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data in accordance with the Data Protection Act. The most common uses of your personal data are as follows:

- | **Contract performance** - we process your personal data where this is necessary for the performance of a contract to which you are a party or to take action at your request before entering into such a contract.
- | **Compliance with a legal or regulatory obligation** - we process your personal data where this is necessary to comply with a legal or regulatory obligation to which we are subject.
- | **Legitimate interest** - we process your personal data where it is in our business interests to do so, in the course of conducting and managing our business, to enable us to provide you with the best and safest service/product and experience possible.
- | **Consent** - you have given your consent to the processing of your (sensitive) personal data for the specific purposes we indicate.

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

We have described below all the ways in which we intend to use your personal data and the legal grounds on which we rely to process that data. We have also identified our legitimate interests, where applicable.

We may process your personal data for more than one lawful purpose, depending on the specific purpose for which we use your data. Please contact us at [privacy@highlight.lu](mailto:privacy@highlight.lu) if you need details of the specific lawful reason we rely on to process your personal data where more than one reason has been set out in the table below.

OBJECTIVE/ACTIVITY	TYPE OF DATA	LEGAL BASIS FOR PROCESSING, INCLUDING THE BASIS OF LEGITIMATE INTEREST
To register as a new client, candidate (assessment and development centres, tests and questionnaires) or participant (training, coaching, skills assessment, workshops).	(a) Identity (b) Contact	(a-b) Performance of a contract with you or a third party (e.g. your employer)  or  (a-b) Necessary for our legitimate interests (in particular to be able to provide our services and to fulfil the contractual obligations we have with our client, who may for example be your employer)
Handle and provide individual coaching, skills assessment and career advice.	(a) Identity (b) Contact (c) Financial (d) Career (e) Personality (f) Contextual (g) Profile (h) Use (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)  (a-b-c) Necessary for our legitimate interests (to collect 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)  (d-e-f) Necessary for our legitimate interests (in particular to be able to assert or defend our legal and contractual rights or to defend our interests in legal proceedings)  (g-h) Fulfilment of a contract with you (including allowing you to access Highlight Academy)  or (g-h) 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 up-to-date and relevant, to develop our business and to inform our marketing strategy).  (i-j) Explicit consent

<p>Process and deliver evaluation and development centres (including feedback), tests and questionnaires, 360° feedback, etc.</p>	<p>(a) Identity  (b) Contact  (c) Career  (d) Personality  (e) Contextual  (f) Profile  (g) Use  (h) Health and psychological data  (i) Other special categories of personal data</p>	<p>(a-b-c-d-e) Performance of a contract with you  or  (a-b-c-d-e) Necessary for our legitimate interests (in particular to be able to provide our services and to fulfil the contractual obligations we have with our client who may for example be your employer) or a third party (e.g. your employer)  (f) Necessary for our legitimate interests (in particular to be able to assert or defend our legal and contractual rights or to defend our interests in legal proceedings)  (g) to perform a contract with you (including allowing you to access Highlight Academy)  or (g) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website current and relevant, to develop our business and to inform our marketing strategy)  (h-i) Explicit consent</p>
<p>Organising and delivering training, workshops, team meetings, team events, team coaching, etc.</p>	<p>(a) Identity  (b) Contact  (c) Personality  (d) Health and psychological data  (e) Other special categories of personal data</p>	<p>(a-b-c) Performance of a contract with you or a third party (e.g. your employer)  or  (a-b-c) Necessary for our legitimate interests (in particular to be able to provide our services and to meet the contractual obligations we have with our client, who may for example be your employer)  (c) Performance of a contract with you or a third party (e.g. your employer)  (d-e) Explicit consent</p>

<p>To process and deliver mindfulness-based sessions and training.</p> <p>Handle and provide HR consultancy services (performance management, competency profiling, interim management, HR process design, etc.)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Health and psychology Data</p> <p>(e) Contextual</p> <p>(f) Other special categories of personal data</p> <p>(a) Identity</p> <p>(b) Contact</p>	<p>(a-b) Performance of a contract with you</p> <p>or</p> <p>(a-b) Necessary for our legitimate interests (in particular to be able to provide our services and to fulfil the contractual obligations we have with our client, who may for example be your employer)</p> <p>(c) Necessary for our legitimate interests (to collect debts owed to us)</p> <p>(d-e-f) Consent (explicit if specific data)</p> <p>(a-b) Performance of a contract with you</p>
<p>Managing our relationship with you, including :</p> <p>(a) inform you of changes to our terms and conditions or privacy policy</p> <p>(b) ask you to leave a review or respond to a survey.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and communication</p>	<p>(a) the performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records up to date and study how customers use our products/services)</p> <p>(d) your consent and/or necessary for our legitimate interests (to keep you informed about our products/services, to send you offers, invitations, etc.)</p>

To allow you to participate in a draw, a competition or to answer a survey.	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Use</li> <li>(e) Marketing and communication</li> </ul>	<p>(a-d) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (studying how customers use our products/services, developing them and growing our business)</p> <p>(c) Necessary for our legitimate interests (to maintain our records and study how customers use our products/services).</p> <p>(e) your consent and/or necessary for our legitimate interests (to keep you informed of our products/services, to send you offers, invitations, etc.)</p>
To administer and protect our business and websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and data hosting).	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Technical</li> </ul>	<p>(a) Necessary to comply with a legal obligation</p> <p>(b-c) Necessary for our legitimate interests (for the management of our business, the provision of administrative and IT services, network security, fraud prevention and in connection with a corporate reorganisation or group restructuring exercise)</p>

## 5. DATA RETENTION PERIOD

We will retain your data for the duration of our relationship and 185 days after the relationship has ended. After this period we will delete or anonymise your personal data.

## 6. RIGHTS OF THE PERSON CONCERNED

Under the data protection legislation and subject to our own rights and obligations, you have the following rights:

**Right of access:** You have the right to request access to your personal data, free of charge, and to obtain a copy of it in an accessible format.

**Right of rectification:** you have the right to ask us to rectify personal data that you consider inaccurate. You also have the right to ask us to complete information that you consider incomplete or inaccurate.

**Right to erasure:** You have the right to request the deletion of your personal data under certain circumstances.

**Right to restrict processing:** you have the right to ask us to restrict the processing of your personal data in certain circumstances.

**Right to object to processing:** you have the right to object to the processing of your personal data in certain circumstances (e.g. object to receiving direct marketing emails).

**Right to data portability:** you have the right to ask us to return your data to you in an easily transmittable format or, if technology permits, to transfer it directly to another service provider.

To exercise these rights, simply send us an email with proof of identity to the following address: [privacy@highlight.lu](mailto:privacy@highlight.lu).

We will then make every effort to do so as soon as possible.

## 7. CLAIM TO THE SUPERVISORY AUTHORITY

If you are not satisfied with our response, you have the right to lodge a complaint with the National Commission for Data Protection ("CNPD"):

15, Boulevard du Jazz  
L-4370 Belvaux

## 8. TRANSFER TO A COUNTRY OUTSIDE THE EUROPEAN ECONOMIC AREA

Unless otherwise stated, we do not transfer your data outside the European Union. If this were to be the case, we would only transfer your data to a country outside the European Union if that country provided a level of protection equivalent to that of the European Union.

In the event of a transfer outside the European Economic Area, we will use the exceptions permitted by the GDPR, including the standard contractual clauses prepared by the European Commission (for more information, see the following link: [https://commission.europa.eu/law/law-topic/data-protection\\_fr](https://commission.europa.eu/law/law-topic/data-protection_fr)).

#### 9. WHAT HAPPENS IF THE PRIVACY NOTICE CHANGES?

If we make any changes to this privacy notice, we will notify you via our website or by message. We recommend that you check this page regularly. The date of the last modification of this document is shown at the top of the document.