

Neterium Data Privacy Statement Talent recruitment and Human Resources Management

Introduction

Neterium srl (“NETERIUM”), with registered office at 6 Chemin du Cyclotron, 1348 Louvain-La-Neuve, Belgium, is committed to protecting the privacy and personal data of individuals whose data it processes.

For the purposes of this Data Privacy Statement, the terms “**Controller,**” “**Processor,**” “**Personal Data,**” and “**Processing**” shall have the meanings assigned to them under the EU General Data Protection Regulation (Regulation (EU) 2016/679) (the “**GDPR**”).

This Data Privacy Statement describes how NETERIUM processes personal data in its capacity as data controller in relation to the processing activities covered by this statement. It applies to personal data collected through employment-related interactions, as well as personal data collected through our website or in the course of interactions you may have with us, including when you contact us by phone, video conference or email. NETERIUM processes such personal data in full compliance with the GDPR and applicable data protection laws.

This Data Privacy Statement was last updated on 29 May 2026. NETERIUM reserves the right to update this Data Privacy Statement from time to time.

NETERIUM purposes (Purposes of Processing)

NETERIUM processes personal data collected through interactions you have with us for the purposes of human resources management and the recruitment of new staff members including (where permitted by applicable law) background checks such as sanctions screening. This also includes the management of payroll for our employees and contractors, and the day-to-day management of our workforce.

This includes the processing of personal data relating to individuals in the context of employment-related activities. Accordingly, this Data Privacy Statement applies to:

- Employees;
- Temporary workers;
- Interns and trainees;
- Contractors;
- Candidates;
- Former employees, where relevant and to the extent required by applicable law or for legitimate purposes.

Data collected (Categories of Personal Data Processed)

For the above-mentioned purposes, NETERIUM may process personal data relating to you, as necessary and in accordance with applicable law. This personal data may include identification and contact information, such as first name, last name, photograph, date of birth, nationality, immigration status, marital status, national identification number, residential address, telephone number, and bank account details, as well as professional information, including your curriculum vitae (CV), education and training, employment history, and diplomas.

In addition, for employees and contractors, NETERIUM may process certain technical and usage data relating to the use of corporate networks and internet access. This includes information such as web traffic data (e.g. websites visited, access frequency, timestamps, and related metadata) collected through network security and filtering tools (including Cloudflare). This processing is limited to monitoring internet access patterns and does not include the content of communications. It is carried out for the purposes of ensuring the security, integrity, and proper use of NETERIUM's IT infrastructure, including the detection and prevention of access to malicious or inappropriate websites, in accordance with applicable law.

Ways of collecting your data

NETERIUM collects and processes personal data relating to you when you voluntarily provide such data during the recruitment process, including when you submit applications, CVs, or communicate with us in connection with employment-related activities. We may also indirectly receive personal data about you from external HR Management companies, recruitment agencies, or service providers that we engage to support our recruitment and human resources management processes.

For employees and contractors, NETERIUM may also collect certain personal data through the monitoring of internet traffic on its IT systems. This includes technical data such as websites visited, access frequency, timestamps, and related metadata. This monitoring is limited to network activity and does not include access to the content of communications, and is carried out for security and IT management purposes, in accordance with applicable law.

Legal Bases for Processing

In the context of employment or contractual relationships with employees and contractors, NETERIUM processes personal data on the basis of one or more of the following legal grounds: (i) the performance of an employment contract or service agreement, (ii) compliance with applicable legal obligations (including employment, tax, and social security laws), and (iii) NETERIUM's or a third party's legitimate interests, such as the management of its workforce, internal administration, and the security and organisation of its business activities.

In the context of recruitment activities, when you submit a spontaneous application or otherwise interact with our staff, NETERIUM processes your personal data for the purpose of entering into a potential employment relationship. Such processing is based on (i) the necessity to take steps prior to entering into an employment contract, (ii) compliance with legal obligations, and (iii) the legitimate interests of NETERIUM or a third party, including the assessment and evaluation of candidates prior to making an employment decision.

NETERIUM does not require sensitive (special category) personal data as part of its recruitment process. We therefore ask that you do not provide personal data revealing racial or ethnic origin, religious or philosophical beliefs, political opinions, genetic data, health data, or data concerning your sexual orientation. Any such information, should it be provided, will not be taken into consideration and will be disregarded.

Your personal data will be processed solely for purposes related to the management of employment or contractual relationships, including recruitment, assessment of applications, and, where applicable, the establishment, performance, and termination of such relationships.

NETERIUM treats your personal data as confidential and processes it in accordance with GDPR. Your personal data will not be shared with third parties outside NETERIUM, except where necessary with (i) HR management service providers, (ii) agents, advisors, or other service providers supporting our business operations (such as recruitment agencies, background screening providers, or legal advisors), or (iii) competent governmental, judicial, regulatory, or supervisory authorities, where required by applicable law.

Data Recipients

Access to your personal data within NETERIUM is strictly limited to authorised persons and granted on a need-to-know basis. Your personal data may be accessed internally by members of NETERIUM's management team, as well as by authorised personnel within Human Resources, Finance, and IT, where such access is necessary for human resources administration, payroll operations, or system management and security.

Where required for the purposes described in this Data Privacy Statement, we may also share your personal data with trusted external service providers, including:

- The secretariat social (for Belgian employees only)
- HR management companies
- Employee benefits providers (e.g., meal vouchers).

All external recipients process personal data in accordance with NETERIUM's instructions and are subject to appropriate contractual, confidentiality, and data protection obligations.

Data Retention Periods

Your personal data will be retained only for as long as necessary to fulfil the purposes for which it is processed, in accordance with applicable law. Personal Data relating to employees and contractors will generally be kept for the duration of the employment or contractual relationship with NETERIUM and for a period of five (5) years thereafter for record-keeping purposes. Personal data relating to candidates will be retained for the duration of the recruitment process and for up to one (1) year following the recruitment decision. NETERIUM may retain personal data for a longer period where this is necessary to comply with legal or regulatory obligations, or to establish, exercise, or defend its rights.

Data Security

NETERIUM is committed to protecting your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or unauthorised access. We implement and maintain appropriate technical and organisational measures to safeguard the personal data we process and to ensure that access to such data is strictly controlled and limited to authorised persons.

Your rights as Data Subject

As a data subject, you are granted rights regarding the processing of your personal data. This Data Privacy Statement explains your right of access by outlining the personal data we process, the reasons for processing it, and how it is processed. You also have the right to request access to your personal data, have it corrected, obtain a copy, or request its deletion. Additionally, you may restrict or object to the processing of your data. Please note that these rights may not apply in all situations.

If you wish to exercise any of your data protection rights, you may contact us at privacy@neterium.io. NETERIUM will respond to your request within one (1) month, in accordance with applicable legal requirements. To ensure the security of your personal data, we may request verification of your identity before processing your request. We also keep a record of requests received and the actions taken in response.

If you believe your personal data has been processed unlawfully or that your rights have not been respected, you have the right to file a complaint with the relevant supervisory authority.

Contact Information

- Privacy contact: privacy@neterium.io
- Supervisory authority: Belgian Data Protection Authority (www.dataprotectionauthority.be)