

Privacy Policy

We understand that your trust in us is **NASCENT's** (hereinafter referred to as "**NASCENT**", "**we**" or "**us**") most important asset. As such, your privacy is essential to us.

This privacy policy (hereinafter "**Privacy Policy**") is applicable to all processing activities of **NASCENT** (as defined below) as a data controller, including processing **(i)** on our website <https://nascent.live> (hereinafter the "**Website**"), **(ii)** on the Nascent platform (accessible via the Website) and **(iii)** any (commercial) relationships between **NASCENT** and its customers, users, prospects and business partners.

NASCENT hereby wishes to emphasize that it always attempts to act in accordance with the applicable privacy legislation, such as (non-exhaustive): **(i)** the General Data Protection Regulation 2016/679 of April 27, 2016 ("**GDPR**"), **(ii)** the Belgian Privacy Law of 30 July 2018, **(iii)** the Dutch General Data Protection Regulation Implementation Act of 16 May 2018, **(iv)** the ePrivacy Directive 2002/58/EC of 12 July 2002 and/or **(v)** other (future) amendments or applicable data protection legislation (hereinafter the "**Privacy Legislation**").

1. **NASCENT AS A DATA CONTROLLER**

The data controller of the processing activities is **NASCENT BV**, a company organized and existing under the laws of Belgium, having its office located at Peter Benoitstraat 54, 3500 Hasselt, Belgium and registered with the Register of Legal Entities of Antwerp, region Hasselt, under number 1022.018.427 and with VAT-number 1022.018.427

For any questions regarding your privacy, you can contact privacy@nascent.live.

2. **NASCENT'S PROCESSING ACTIVITIES**

Which Personal Data we collect, store and process and the purpose for which we process this data may differ depending on your relationship with **NASCENT**.

We process your Personal Data when:

- You are browsing on our Website;
- You (wish to) receive direct marketing (such as newsletters) relating to **NASCENT's** Platform and services;
- You are a prospect and/or seeking a commercial relationship with **NASCENT** (B2B);
- You are an active **NASCENT** customer (B2B);
- You are a user of the **NASCENT** Platform;
- You are a user of the **NASCENT** Platform; or
- You are using the **NASCENT** Platform via a partner (i.e. accelerator, employer, ...).

2.1 You are browsing on our Website

Contacting **NASCENT** via the contact form:

PURPOSE	Answering questions / inquiries via the contact form
PERSONAL DATA	Full name, (work) email address, voluntarily provided message
LEGAL GROUND	Consent

RETENTION PERIOD	Up until one (1) year after your last contact with NASCENT
-------------------------	--

Downloading a whitepaper:

PURPOSE	Downloading a NASCENT whitepaper via the Website
PERSONAL DATA	Full name, (work) email address, company name, company function
LEGAL GROUND	Consent
RETENTION PERIOD	Up until one (1) year after your last contact with NASCENT

Cookies:

When browsing on our Website, we may also collect your Personal Data through cookies stored on your device(s) in order to optimize the functioning of the Website. Please consult our [Cookie Policy](#) for more information.

PURPOSE	Optimizing and personalizing your browsing experience.
PERSONAL DATA	Electronic identification data: IP address, information collected via cookies
LEGAL GROUND	Legitimate interest for necessary cookies. Explicit consent for non-essential cookies (consent can be withdrawn at any time).
RETENTION PERIOD	Dependent on type of cookie and the cookie consent.

2.2 You (wish to) receive direct marketing (such as newsletters) relating to NASCENT's Platform and services

Direct marketing:

PURPOSE	Providing information on NASCENT, (new features on) the Platform or related services or events
PERSONAL DATA	Full name, (work) email address
LEGAL GROUND	Consent
RETENTION PERIOD	Until you have objected to the processing of your Personal Data for this purpose (cfr. "Right to object"). You will be automatically unsubscribed if we did not contact you for over five (5) years.

2.3 You are a prospect and/or seeking a commercial relationship with NASCENT (B2B)

General communication with NASCENT and prospecting by NASCENT:

PURPOSE	Having quality conversations to provide more information about NASCENT, the Platform and its services via mail, telephone, business social media etc.
PERSONAL DATA	Full name, (work) email address, phone number, company name, country, type of company, social media / business channel, voluntarily provided information
LEGAL GROUND	Legitimate interest
RETENTION PERIOD	Until you have requested to no longer be contacted by NASCENT or until one (1) year following your latest contact with NASCENT, whichever comes first

Quotes / proposals:

PURPOSE	Providing qualitative quotes and proposals for possible cooperations
PERSONAL DATA	Full name, company name, (work) email address, billing address, VAT-number
LEGAL GROUND	Legitimate interest
RETENTION PERIOD	Until one (1) year following the termination of the commercial relationship between the company and NASCENT

2.4 You are an active NASCENT customer (B2B)

General communication and (technical) support via the support chat:

PURPOSE	To enable communication with and to provide support to customers
PERSONAL DATA	Full name, (work) email address, company information (name, VAT-number), telephone number, billing address
LEGAL GROUND	Necessary for the performance of the agreement
RETENTION PERIOD	Until one (1) year following the termination of the commercial relationship between the company and NASCENT

Invoicing:

PURPOSE	Invoicing for the use of the Platform and the services
PERSONAL DATA	Full name, company name, (work) email address, billing address, VAT-number
LEGAL GROUND	Legal ground for bookkeeping reasons
RETENTION PERIOD	A period of 7 years for bookkeeping reasons

2.5 You are a user of the NASCENT Platform

General communication and (technical) support:

PURPOSE	Assisting with possible issues and/or answering any questions
PERSONAL DATA	Full name, (work) email address, voluntarily provided information, (technical) information about the enquiry
LEGAL GROUND	Necessary for the performance of the agreement
RETENTION PERIOD	Up until two (2) years after your last contact with NASCENT

Creating your account:

PURPOSE	Making use of the Platform and the services
PERSONAL DATA	Full name, (work) email address, date of birth, education, professional experience, language knowledge, profile picture (optional), company information
LEGAL GROUND	Necessary for the performance of the agreement
RETENTION PERIOD	Until two (2) years following the termination of the commercial relationship between you and NASCENT (i.e. the use of the Platform)

Using the Platform:

PURPOSE	Performing NASCENT's soft skills assessment and using the Platform for its intended services
PERSONAL DATA	Soft skills analysis, personality analysis, history of assessments, matching scores, profile information, interaction data
LEGAL GROUND	Necessary for the performance of the agreement
RETENTION PERIOD	Until deletion of the self-assessments or account or two (2) years following the termination of the commercial relationship between you and NASCENT

2.6 You are part of NASCENT's scientific research efforts

Research purposes:

PURPOSE	Processing of data by NASCENT for research purposes
PERSONAL DATA	Data collected as part of scientific research such as identification data and survey data
LEGAL GROUND	Legitimate interest
RETENTION PERIOD	Until completion of the research project or anonymization

2.7 You are using the NASCENT Platform via a partner

If you are using this Platform through one of our partners, please note that the partner is considered your data controller (as they chose to use the Platform, determine whether you receive an account and manage other decisions). However, NASCENT may act as your data controller in specific situations, such as when you directly interact with NASCENT for customer support or account creation.

3. LEGAL GROUNDS

You can find more information on the applicable legal ground for each of the identified processing activities in the section above. In case the legal ground for processing is legitimate interest, NASCENT shall always **(i)** assess whether this is in proportion with the purpose for which your Personal Data was collected and used and **(ii)** take your reasonable expectations into account and ensure a balance with your fundamental rights and freedoms. If we cannot guarantee this, we will stop storing / using your Personal Data or we will determine a new legal ground.

4. RETENTION PERIOD

You can find more information on the applicable retention period for each of the identified processing activities in the section above. Unless a longer storage period is required or justified **(i)** by law or **(ii)** through compliance with another legal obligation, NASCENT shall only store your Personal Data for the period necessary to achieve and fulfil the purpose in question.

5. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

NASCENT shall never disclose your Personal Data to other third parties, unless it is necessary to achieve the purposes described in this Privacy Policy. In this respect, (some of) your Personal Data may be disclosed to trusted:

- Software and cloud providers
- Service providers
- Payment providers
- Research partners

The necessary contracts or legal binding acts are in place to ensure these third parties treat your Personal Data in accordance with the Privacy Legislation (e.g. Article 28 GDPR).

In addition, Nascent might transfer your Personal Data:

- To competent authorities: for instance, because **(i)** we are obliged to provide your Personal Data under law or in the scope of (future) legal proceedings, or **(ii)** this is necessary to safeguard our rights; or,
- In M&A context: meaning, if NASCENT or the majority of its assets, is taken over by a third party, in which case your Personal Data – which NASCENT has collected – may be one of the transferred assets.

6. CROSS-BORDER PROCESSING OF PERSONAL DATA

In case any of the above mentioned third parties or other recipients are located in a country outside the European Economic Area, NASCENT will ensure that one or more of the listed EU-approved safeguards are in place:

- European Commission adequacy decision;
- Data transfer agreement (cfr. the Standard Contractual Clauses as provided in the European Commission Implementing Decision (EU) 2021/914 of 4 June 2021, including the performance of a transfer impact assessment);
- Binding corporate rules; or
- Certification mechanisms.

7. SECURITY MEASURES

We use reasonable and appropriate technological and operational security measures to keep your Personal Data protected against (i) any unauthorised access and (ii) loss, abuse or alteration of your Personal Data. Such measures include:

- Ensuring the physical and digital security of our equipment and devices by using appropriate password protection and encryption where necessary;
- Ensuring the physical security of our offices and other sites;
- Maintaining a data protection policy (including access restrictions) for, and delivering data protection training to, our employees.

8. YOUR PRIVACY RIGHTS

Based on the Privacy Legislation, and provided that you meet the requirements set by this legislation, you can contact us to exercise the following rights:

- Withdrawing your consent for the Processing of your Personal Data, to the extent that the Processing of your Personal Data was initially based upon your consent;

- Seeking access to, correcting, deleting or restricting your Personal Data;
- Objecting to any Processing for direct marketing;
- Objecting to any Processing based on our legitimate interest;
- Seeking the portability of your Personal Data, which you have communicated to us and that we have Processed; and
- Lodging a complaint with the supervisory authority in the European member state of your habitual residence, your place of work or the alleged infringement of applicable data protection legislation.

9. THIRD PARTY APPLICATIONS AND WEBSITES

This Website contains links to other websites operated by third parties, including but not limited to certain social media sites such as LinkedIn. This Policy does not apply to any website, other than this one. Third party websites are governed by their own terms and conditions. You should therefore always carefully check the privacy and cookie policies of third party websites before accepting to be redirected to them.

We also display social media buttons on our Website. When you click on any of those buttons, your Personal Data may be transferred to these companies and they may also set cookies or other tracking technologies on your browser. The privacy policies and terms of use of each of those companies govern the collection and use of your Personal Data when you click on their buttons on our Website.

10. UPDATES

As NASCENT expands and improves its Website and Platform, or as legal requirements change, we may need to update this Privacy Policy. This Privacy Policy may be modified from time to time without prior notice. We encourage you to review this Privacy Policy on a regular basis for any changes. The date of the latest version and the respective version history will be identified at the bottom of the Privacy Policy.

11. NOTIFICATIONS AND QUESTIONS

Notifications under this Privacy Policy (such as, exercising your rights as a data subject) and/or any questions or concerns with regard to the provisions of this Privacy Policy must be directed at:

Via mail: Privacy Nascent, Peter Benoitstraat 54, 3500 Hasselt

Via e-mail: privacy@nascent.live

12. COMPLAINTS

If you are not satisfied with the manner in which we collect, store or otherwise treat or secure your Personal Data, we will take all reasonable measures to rectify the situation upon notification.

You also have the right to lodge a complaint with the supervisory authority in the European member state of your habitual residence, your place of work or the alleged infringement of applicable data protection legislation:

In Belgium, the Supervisory Authority is:

Belgian Data Protection Authority
Rue de la Presse 35 / Drukpersstraat 35
1000 Bruxelles / 1000 Brussel

Tel. +32 2 274 48 00

contact@apd-gba.be

www.dataprotectionauthority.be

VERSION HISTORY

April 2025	Publication
------------	-------------