

Privacy policy

At 20 Seconds to Midnight we intend to give you as much control as possible over your personal information, including the registration data. We will let each user know how we will use the personal information derived from each user's access to and use of 20 Seconds to Midnight' website and/or the services.

To successfully pursue its activities 20 Seconds to Midnight sometimes needs to process personal data about individuals. These can include prospects, customers, job seekers, journalists, vendors, investors, competitors, alumni and other people the organization has a relationship with or may need to contact. ¹

20 Seconds to Midnight is committed to respect the rights of the people whose personal data is being processed. Therefore, 20 Seconds to Midnight complies with data protection regulations such as the General Data Protection Regulation² ("GDPR") and national laws of the countries in which it operates.

This privacy statement describes which personal data we collect, why we do it, how long we keep it and the rights you can exercise with regard to your personal data. It applies to all personal data submitted to 20 Seconds to Midnight via the website, by email, or by any other means.

Controller

The 20 Seconds to Midnight acting as Controller is the entity within 20 Seconds to Midnight Group through which website the Personal Data concerned have been collected. The 20 Seconds to Midnight acting as Controller is referred to as "20 Seconds to Midnight" throughout this document.

Personal data we collect about you

If possible, we will try to collect the personal data directly from the person concerned. However, it may be necessary to collect personal data from third parties in the context of future relationships (e.g. customers or candidates).

I. Information you provide us:

- contact form filled out by you (website): name, email, company, phone, function, subject and message;
- job applications (websites or via recruitment company): application forms, CV, interview notes and related recruitment information;
- your feedback;
- content of correspondence with us (by email, phone, letter, ...);
- subscription to newsletters;
- information from social media when you link to our website (online)
- information relating to your use of our products or services
- contact details of past, present and future customers
- contact details of past, present and future suppliers, vendors, investors or other stakeholders

II. Information we may automatically collect if you visit our website:

- technical information, including IP address, login information, browser type and version

- cookies and other technologies (See our Cookie Policy on our website for more info.)
- 20 Seconds to Midnight will track the domains from which people visit 20 Seconds to Midnight and analyse this data for statistical purposes. Subject to the provisions of this Privacy Policy, different 20 Seconds to Midnight sites may use accumulated data for different purposes, including but not limited to marketing analysis, service evaluation and planning.

III. Use of children's data:

20 Seconds to Midnight does not knowingly collect, process or store any personal data about children under the age of 16 and we do not offer any products or services directly to children under the legally allowed age.

Finally, information collected on our site may be stored and processed into anonymous statistics or log files for internal use.

Purposes

In general, we may have to process all categories of personal data to comply with applicable legal or regulatory requirements, relevant industry standards and our policies, and for litigation or defence of claims.

- customers' and prospects' personal data:

We use your personal data for the performance of your contract(s) with 20 Seconds to Midnight or business development purposes. In particular we process customers personal data to deliver and provide our products or services and to invoice them, as well as for the execution and analysis of market surveys and marketing strategies.

We also use your contact details to further inform prospects and customers about our products and services that are in line with our already existing relationship and for marketing such as offering promotions.

- Suppliers', vendors, journalists and other stakeholders personal data:

We process your personal data to conclude and execute our agreements and manage our relationships.

- Investors' and shareholders' data:

We use your personal data in order to manage our relationship and our obligations. We maintain contact details for external communications and to respond to your queries.

- Students and Job seekers' data:

Your personal data are stored for the recruitment and selection procedures. More specifically, your personal data are processed for the purposes of assessing your profile and skills to fit a job and making you specific job offers.

Subject to your explicit consent, we will use your contact details to send you our newsletter, mailing and invite you to events. We also may use the personal data in other ways, for which we provide specific notice at the time of collection.

Other Notification: In order to implement or enforce the Terms of Service of the relevant 20 Seconds to Midnight site, 20 Seconds to Midnight may use personal data to contact users on an individual basis.

Retention of your personal data

Your personal data is kept in our information systems only for as long as is necessary for the purposes for which it was collected (as described above). It will be deleted once it is no longer needed by us and once all requirements at law have been met.

We will retain and use your personal data for as long as reasonably necessary to perform our agreements or to consider tenders, to comply with our legal obligations (such as accounting and tax obligations) and to resolve disputes or enforce our agreements. Therefore, your personal data will be held during the duration of our contractual relationship and up to 10 years thereafter.

Application forms (CV's), interview notes and references of unsuccessful candidates are kept for a period of 24 months following the closure of the hiring process. When we would like to stay in contact with an applicant who was not chosen for the job he/she applied for we will ask for his/her consent to keep the cv in our application pool for another 2 years.

In all cases personal data may be kept for a longer period of time where there is a legal or regulatory reason to do so, or a shorter period where the individual objects to the processing of their personal data and there is no longer a legitimate purpose to retain it.

Legal basis

20 Seconds to Midnight only processes your personal data if at least one of these grounds applies:

- For the preparation or performance of a contract.
- In order to comply with the legal and regulatory obligations to which we are subject.
- For legitimate business interests, in which case we always seek to strike a balance between that interest and respecting your privacy.
- If none of the above, where we have your explicit consent.

Disclosure to third parties

20 Seconds to Midnight does not share your personal data with third parties, unless:

- with our legal successors and other affiliated companies within the 20 Seconds to Midnight group, for the same purposes as specified in this Privacy Statement.
- with subcontractors and third parties for the purpose of the performance of a contract that we hold with them or that we hold with you.
- with third party service providers who perform services on our behalf to help us with our business activities. These service providers are limited to only using your personal data as instructed to carry out their tasks.
- permitted or required by applicable law or regulatory requirements.
- with law enforcement authorities or other government officials.
- with other third parties with your consent.

Transfer to third countries

When we transfer your personal data to other countries, outside of the European Economic Area, 20 Seconds to Midnight will take measures to ensure that your personal data is exclusively processed in accordance with this Privacy Statement and that adequate levels of protection have been implemented in order to safeguard your personal data. These arrangements can include Binding Corporate Rules for transfers within the 20 Seconds to Midnight Group, standard contractual clauses or approved certification mechanisms. Copy of any such applicable arrangements can be obtained by sending a request to privacy@20seconds.com.

Your rights

In accordance with the GDPR, 20 Seconds to Midnight will respond to your requests in the GDPR mandated time to exercise following rights:

Right to be informed

20 Seconds to Midnight is transparent by providing you any information relating to the processing of your personal data via this privacy statement or specific information notices at the time of collection.

Right to access

You have the right to request a copy of the personal data that 20 Seconds to Midnight holds about you. We may require proof of identity before fulfilling such requests.

Right to rectification

If the personal data that 20 Seconds to Midnight holds about you is inaccurate or incomplete, you have the right to ask us to update or rectify it.

Right to be forgotten

You have the right to request 20 Seconds to Midnight to erase all your personal data. We will delete your personal data without undue delay if we do not have any legal reason or legitimate purpose to continue to process it.

Right to restrict processing

In some specific cases, you have the right to ask 20 Seconds to Midnight to restrict how we process your personal data.

Right to data portability

This right only applies to personal data that you have provided to 20 Seconds to Midnight, based on consent or for the performance of a contract. 20 Seconds to Midnight will provide your personal data in a structured, commonly used and machine-readable format to be able to transmit it to another controller, or have it directly transmitted by 20 Seconds to Midnight if technically feasible.

Right to object

You have the right to object to the processing of your personal data if the processing is based on the legitimate interest of 20 Seconds to Midnight or on public interest. 20 Seconds to Midnight will discontinue the processing of your personal data, unless we can demonstrate compelling legitimate grounds for the processing which override your interests or rights, or for the establishment, exercise or defence of legal claims.

Right to withdraw consent

Where your consent was required for the collection or use of your personal data, you have the right to withdraw your consent at any time. For example, you may choose to stop receiving our newsletter by following the unsubscribe instructions included in the emails.

Right to lodge a complaint

You have the right to lodge a complaint with the competent supervisory authority if you consider that the processing of your personal data infringes this Privacy Statement or the GDPR.

You can exercise your rights by sending a request by email to info@20STM

Data security

20 Seconds to Midnight has security policies and procedures in place to protect your personal data from unauthorized loss, misuse, alteration or destruction. Despite our best efforts, however, security cannot be absolutely guaranteed against all threats.

To the best of our ability, 20 Seconds to Midnight has taken steps to ensure the ongoing confidentiality, integrity, availability, and resilience of systems and services processing personal information. These actions may include physical security measures, network security measures, and organizational measures such as confidentiality clauses and restricted access.

Limitations of responsibility

20 Seconds to Midnight contains links to other websites, whether owned or controlled by 20 Seconds to Midnight Group' affiliates or unrelated third parties. 20 Seconds to Midnight is not responsible for the privacy policies and practices of such linked websites.

Publication

User names and email addresses (as well as any additional information that a user may choose to post) are publicly available on the 20 Seconds to Midnight blog, unless a user elects to "opt-out" of such display of personal information. However, in cases where users voluntarily and publicly disclose personal information, which may contain Personal Data, it is his sole responsibility.

Surveys and Resulting Information: Subject to the foregoing, 20 Seconds to Midnight may conduct surveys or other studies of its customer base and usage for marketing and planning purposes. Participation in such surveys is at the user's option; 20 Seconds to Midnight does not conduct mandatory surveys.

With respect to information collected from such surveys or studies, and in the event that responses are to be publicly disclosed, users will be notified at the time they take the survey and 20 Seconds to Midnight will disclose only aggregate information regarding its users and not personal information identifying any specific individual. Circumstances under which 20 Seconds to Midnight would publicly disclose such aggregate information include, but are not limited to, sharing survey results with the site population, providing data to 20 Seconds to Midnight' advertisers on user preferences and/or demographics, and publicizing overall usage data in press communications.

Notwithstanding the foregoing, in cases where surveys allow users to submit written comments, and where 20 Seconds to Midnight advises users of the possibility of such disclosure at the time they take the survey, 20 Seconds to Midnight reserves the right to disclose text information provided by any user through such a survey, provided that no personal information identifying that user is disclosed.

IV. 20stm acting as Processor on behalf of a Customer acting as a Controller

When 20STM, through a service contract, acts a Processor for its Customer, it will implement all appropriate technical and organisational measures in such a manner that processing will meet the requirements of the GDPR Regulation and ensure the protection of the rights of the data subject. In particular it :

- acts on the controller's documented instructions, unless required by law to act without such instructions;
- ensures that people processing the data are subject to a duty of confidence that is further defined in the service contract between 20STM and the Customer;
- takes appropriate measures to ensure the security of processing;

- only engages a sub-processor with the controller's prior authorisation and under a written contract;
- takes appropriate measures to help the controller respond to requests from individuals to exercise their rights;
- assists the controller in meeting its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessments;
- deletes or returns all personal data to the controller (at the controller's choice) at the end of the contract, and the processor must also delete existing personal data unless the law requires its storage; and
- makes available to the controller all information necessary to demonstrate compliance with the GDPR obligations and allow for and contribute to audits, including inspections, conducted by the controller or another auditor mandated by the controller.

Changes to our Privacy Policy

20 Seconds to Midnight may change this Privacy Policy from time to time to reflect new legal or regulatory obligations, or in response to new data processing activities. Where the changes are significant we may choose to send an e-mail to all our registered users with the new details. Any such changes will be posted here and will be effective from the time they are communicated, or, if required, when we have obtained your consent. We advise you to check back frequently to see any updates or changes. This Privacy Policy was last reviewed on May 23, 2018.

¹ Employees of 20 Seconds to Midnight can consult the Privacy Statement Employees on our intranet.

² Regulation (EU) 2016/679 of the European Parliament and of the Council 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, and repealing Directive 95/46/EC.