

# NewCo Privacy Policy

## **NEWCO COMMUNICATIONS PRIVACY NOTICE**

**30/03/2026**

### **BACKGROUND:**

**NewCo Communications** understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers, clients (customer's customers), and employees and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law. For information of the collection and use of the personal data of the employees we refer to the Data Protection Policy of the Employees.

## **1. Information About Us**

### **NewCo Communications B.V.B.A.**

Customer Service, Business Processes, and Consultancy registered in Belgium. Registered address: Leuvensesteenweg 643 box 29 - 1930 Zaventem, Belgium.

### **Subsidiary (Site) addresses:**

NCC Barcelona (T&H Customer Experience S.L.)

C. de Provençals 39 08019 Barcelona, Spain

NCC Valencia (T&H Customer Experience S.L.) Pl. d'Àmerica 2 (3rd floor)

46004 Valencia, Spain

NCC Casablanca ([CBIS.COM](http://CBIS.COM) S.A.) 2, Rue Abou Salt Andaloussi

20250 Casablanca, Morocco

NCC Tanger (C [CBIS.COM](http://CBIS.COM) S.A.)

39, Av. Sanhaja

90060 Tanger, Morocco

### **VAT numbers:**

NewCo Communications BVBA: BE 0477.570.491. T&H Customer Experience

S.L.: NIF B66730698

[CBIS.COM](http://CBIS.COM) S.A.: R.C. 177329 - T.P. 35774017

I.F. 1107960 - CNSS 7718705

Security Department: [security@newcogroup.com](mailto:security@newcogroup.com).

## **2. What Does This Notice Cover?**

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data. Our processing of your personal data is designed to ensure the protection of users and their rights in compliance with the GDPR and applicable legislation.

## **3. What is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. The personal data that we use is set out in Part 5, below.

## 4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if our controller or we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of your personal data held by us to re-use with another service or business in many cases.
- i) The right to lodge a complaint with a supervisory authority. If you believe that we are processing your personal data in violation of the GDPR, you have the right to lodge a complaint with a supervisory authority responsible for data protection.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11. We will forward your request to the involved customer (controller) and support them to be able to exercise your rights.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Data Protection Authority or your local Supervisory Authority..

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Data Protection Authority. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

## **5. What Personal Data Do You Collect and How?**

Depending on your relationship with us or with our clients, we process different categories of personal data.

### **General categories of personal data**

We may process:

- Identification data (name, date of birth, ID/NIE/passport number)
- Contact data (email, address, telephone number)
- Professional data (job title, employer, CV information)
- Financial data (payment and banking details)
- Communication data (emails, call logs, recordings where applicable)
- Technical data (e.g. IP address, device data where applicable)

### **Data processed depending on the data subject category**

#### **Clients and prospective clients**

We typically process:

- Identification and contact data
- Communication data (emails, calls, recordings)
- Professional and business-related information
- Payment and billing data

#### **Candidates (recruitment)**

We typically process:

- Identification and contact data
- CV, professional experience, and education data
- Interview notes and assessment data

### **Employees and representatives of our clients**

We typically process:

- Identification and contact data
- Professional data (job title, company)
- Communication data

### **Our employees**

We process:

- Identification and contact data
- Employment and contract data
- Payroll and financial data
- Social security and tax-related data

### **Suppliers and service providers**

We process:

- Identification and contact data
- Professional and business information
- Financial and payment data

Your personal data is obtained from the following third parties:

- Several controllers, we process your data according to the GDPR and the contract with these controllers.
- Several sub-processors, as gestoria and recruitment agencies.
- All our sources are run through the “Do not call me” list before use.

The collection method and the source(s) are according to the contracts with the respective controllers and documented in the respective Records of Processing Activities and Data Impact Assessments.

We do not collect any 'special category' or 'sensitive' personal data nor personal data relating to children nor data relating to criminal convictions and/or offences.

## **6. How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract of our customers (controllers) with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. The Records of Processing Activities describes how we may use your personal data, and our lawful bases for doing so.

Your personal data may be used for one of the following purposes:

- Providing and managing your account.
- Administering business.
- Recruitment and candidate evaluation (where applicable)
- Managing employment relationships (for our employees), including HR administration and compliance with labour obligations
- Ensuring the security of our systems and preventing fraud or misuse
- Ensuring the protection of individuals' rights and personal data
- Complying with our legal and regulatory obligations
- Supplying our services to you. Your personal details are required in order for us to enter into an indirect contract with you.
- Managing payments for our services, invoices and financial records
- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from or to you.
- Supplying you with information by email and post that you have opted-in to (you may unsubscribe or opt-out at any time by the controller).
- Training and quality assurance purposes, including staff training, performance evaluation, and improvement of our services (for example, through the review of communications such as calls or emails)
- Ensuring the protection of users' rights and data, and complying with our legal obligations under the GDPR.

We will only use your personal data for the purpose(s) for which they were originally collected by the controller, according to the contract, unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis, which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## **7. How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- The retention periods are limited to 3 months, but depending on the sensitivity of the data the retention period is much shorter (see Data Retention Policy);
- The retention periods of data obtained by and processed on behalf of a controller are determined by the controllers, and documented in the respective Records of Processing Activities.

## **8. How and Where Do You Store or Transfer My Personal Data?**

We will consult, store or transfer some of your personal data within the European Economic Area (the “EEA”), Barcelona and Valencia, Spain. The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

We may consult, store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the “EEA” consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as “third countries” and may not have data

protection laws that are as strong as those in the EU and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within Europe and under the Data Protection Legislation as follows:

We share your data within the group of companies of which we are a part. Where this involves the transfer of personal data outside the EEA, our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage.

## **9. Do You Share My Personal Data?**

We may share your personal data with other companies in our group for the purposes described in Part 6. This includes, and is limited to subsidiaries in Barcelona and Valencia, Spain and Casablanca, Morocco.

These may include payment processing, delivery, and marketing. In some cases, those third parties (subsidiaries) may require access to some or all of your personal data that we hold.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described in Part 8, and our corporate rules.

We may sometimes contract with third parties (as described above) that are located outside of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). If any personal data is transferred to a third party outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the EU and under the GDPR, as explained above in Part 8.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used them, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within less than a month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 11. International Data Transfers

In the course of our operations, your personal data may be transferred to and processed in countries outside of the European Economic Area (EEA). These transfers are conducted in compliance with applicable data protection laws and are subject to appropriate safeguards to ensure the security and lawfulness of the processing. Specifically:

- **Morocco:** Transfers to Morocco are carried out on the basis of the European Commission’s **Standard Contractual Clauses (SCCs)**.
- **United Kingdom:** Transfers to the United Kingdom are conducted under the **EU-UK Adequacy Decision** issued by the European Commission on 28 June 2021, confirming an adequate level of data protection.

## 12. Data Protection Complaints and Reporting Procedure

All complaints or concerns regarding data protection matters may be submitted through our **Ethical Reporting Form**. When completing the form, please select the option "**Breach of Legal**

**Form**" or **Other**" to categorize your report appropriately. Reports submitted through this channel are transmitted directly to an independent external law firm which manages the receipt and initial review of such matters to ensure confidentiality and impartiality.

The specific timeframe for responses to complaints submitted via this channel is currently 5 business days.

### **13. How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of GDPR Department):

Email address: [security@newcogroup.com](mailto:security@newcogroup.com).

### **14. Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available in a last version on our website [# Newco Communications –](#)

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