Privacy Notice

Last updated: 23-06-2026

1. Who are we and what do we offer?

We are Iconic Works B.V. **("Iconic Works")**. We provide AI-related IT services, including but not limited to the development, delivery, and operation of AI-powered software solutions that analyse, review, and improve complex project documentation and workflows (our "Services").

You can find out more about us through our **Website**: iconic.works.

2. Personal Data and Controller

We process **Personal Data**. Personal Data means all information by which a person can be directly or indirectly identified. Under the General Data Protection Regulation (**GDPR**) we are the so-called Controller of your Personal Data. If you have questions about the processing of your Personal Data, you can always contact us through the contact details listed at the bottom of this Privacy Notice.

3. What Personal Data do we collect as Controller?

As a Controller, we may process your Personal Data in different contexts.

We will process your Personal Data if you represent one of our professional relationships (**Business Representatives**). We may process Personal Data in a general context, e.g. via our Website and social media accounts (**General**). We will also process your Personal Data if you apply for a job at Iconic Works (**Applicants**).

If you are a **Business Representative**, we may process the following Personal Data:

Personal Data	Purpose(s)	Legal basis
When we are in contact: - Your name; - Contact details; and - The content of the correspondence.	*We use this information to:* - Discuss and execute the business relation between us and the organisation you represent.	We may process the Personal Data, because we have a **legitimate interest** in being in contact with you in order to execute our business relationship with the organisation you represent.

Personal Data we may process if you are an **Applicant**:

(Personal) data	Purpose(s)	Legal basis
Contact details: - First and surname; - E-mail address; - Address; and - telephone number.	*We use this information to:* - Contact the Applicant about the application.	We may process this Personal Data, because we have a **legitimate interest** in processing this data. We need the data to get (and keep) in touch with the Applicant and to process and review the application.
Application information: - Information provided by the Applicant, among others: Personal Data included in the Curriculum Vitae and motivation letter, qualifications, photo, gender, and day of birth.	*We use this information to:* - assess whether the Applicant suits the job and Iconic Works; and - Determine which Applicant is the most suitable candidate.	We may process this Personal Data, because we have a **legitimate interest** in processing this data and because the Applicant provides this data itself and voluntarily. We need the data to get (and keep) in touch with the Applicant and to process and review the application.
Information retained during application process: - Notes from interviews.	*We use this information to:* - Assess whether the Applicant suits the job and Iconic Works; and - Determine which Applicant is the most suitable candidate.	We may process this Personal Data, because we have a **legitimate interest** in processing this data. We need the data to get (and keep) in touch with the Applicant and to process and review the application.
Information from public sources: - Information in public profiles, such as LinkedIn and other social networks (where applicable).	*We use this information to:* - Assess whether the Applicant suits the job and Iconic Works; and - Determine which Applicant is the most suitable candidate.	We may process this Personal Data, because we have a **legitimate interest** in processing this data. We need the Personal Data to process and assess the application. We only process information that is relevant for the application and the Applicant gets the

		opportunity to react to our findings.

Personal Data we may process **in general**:

Personal Data	Purpose(s)	Legal basis
If you visit our Website: - Information on your device type, browser type, session date and time, IP address, and browser type.	*We use this information to:* - Communicate in the same language of the browser; - Adapt our Website to the used device; - Enable you to use our Website; and - Improve the usability of our Website.	We may process this data because we have a **legitimate interest** to do so, i.e. to provide you with a good functioning Website and improve our Services.
Via our social media pages: - Information of visitors who leave a comment or otherwise post something on our social media pages, including the Personal Data within these comments and/or posts.	*We use this information to:* - Contact the visitors in reply of their post and/or comment via our social media pages; and - Process the feedback left on our social media pages.	We may process this Personal Data, because we have a **legitimate interest** to process this data and because the visitors voluntarily made public such information. Our social media pages are also controlled by the social medium itself. Please check their own privacy notices; to see how each social medium handles Personal Data: LinkedIn: Privacy Notice
If you contact us: - Your name; - Contact details; and - The content of the correspondence.	*We use this information to:* - Answer your questions and/or handle any complaints; - Support you in using our Services; and - improve our Services as a result of questions and feedback from you.	We may process this data, because we have a **legitimate interest** to contact and assist you based on your comment or question and to improve our Services as a result of the questions and feedback we receive.

4. Cookies

We may use functional cookies and similar technologies on our Website. We also use Framer's built-in analytics functionality, which provides aggregated, non-identifying website statistics.

For more information on our use of cookies, please refer to our cookie policy.

5. How long do we keep the Personal Data?

We will not process or store any Personal Data that we do not need. We store Personal Data for as long as we need it for the above purposes, unless we are legally obligated to retain the Personal Data for a longer period. In this respect, we apply the following retention periods:

- **Business Representatives** | We retain the Personal Data for 5 years after our relationship with the organisation you represent has ended;
- **Newsletters** | We retain the Personal Data used for sending newsletters until you unsubscribe from our newsletter.
- **Personal Data in our correspondence** | We retain the Personal Data as long as necessary to handle your message/question/complaint and for a period of 5 years thereafter.
- **Personal Data in our records for the (tax) authorities** | We retain the Personal Data for 7 years, unless we are legally obliged to retain the data for a longer period.
- **Personal data of Applicants** | We retain the Personal Data for a maximum of 4 weeks after the application process, unless the Applicant has given us permission to store the Personal Data for (up to) 1 year.

After expiry of the aforementioned retention period(s), we may process and retain certain Personal Data to comply with legal retention obligations and/or for fraud/misuse investigations or to substantiate a (judicial) claim. In such events, we will retain the Personal Data separately and only use such Personal Data for the aforementioned purposes.

6. Do we share your Personal Data with others?

Processors

We work with third parties who process personal data on our behalf (**Processors**). By doing so, we continue to uphold responsibility for ensuring protection of your Personal Data during such processing. These Processors may only use or disclose the data collected and processed by us within the scope of our instructions to them and under no circumstances for other purposes. We enter into a data processing agreement with all of our Processors.

For instance, we use Processors for:

- email management and communication;
- data storage; and
- applicant tracking; and
- business lead tracking

Controllers

We might also share your personal data with third parties who use it for their own purposes. Once they have your Personal Data, it is their responsibility to protect it. To know how these parties handle personal data, you can check their privacy notices.

We share Personal Data with:

- Tax authorities: We are legally obliged to include (some of) the Personal Data in our financial administration, which has to be shared with the national tax authority.
- Suppliers: Such as insurers, government agencies, and similar parties.

Apart from the above, we will only share Personal Data with third parties if the law obliges us to, if you give your permission or if this is necessary in special situations such as:

- The protection of our own interests or those of third parties;
- Dealing with a legal case; or
- Selling or merging our company.

7. Data Security

We treat the security of your Personal Data with the utmost seriousness and implement a comprehensive set of technical and organisational measures to protect your Personal Data against unauthorised access, disclosure, alteration, or destruction. Our approach is based on industry best practices and is designed to ensure the confidentiality, integrity, and availability of all Personal Data we process.

These measures include, where appropriate, the use of encryption for data both in transit and at rest, strict access controls to ensure that only authorised personnel with a legitimate need-to-know can access Personal Data, and strong authentication mechanisms. We maintain secure audit logs and regularly test and review our systems and processes to identify and mitigate potential vulnerabilities.

We also require our third-party service providers to implement appropriate security measures consistent with applicable data protection laws. In line with the GDPR, we maintain a documented incident response process and ensure that our employees receive regular training on data protection and information security obligations.

8. Export of Personal Data outside the European Union

We may transmit Personal Data to parties outside the European Union, if one of our Processors or Controllers is established outside the European Union. Personal Data will only be transferred to countries and/or parties that provide an adequate level of protection in accordance with the European standards, or if we have contractual safeguards in place. You may contact us if you wish to receive more information or a copy of the safeguards we take in this scope.

9. Third party websites

You may find advertising or other (hyper)links on our Website that link to the websites, products and services of partners, suppliers, advertisers, sponsors, licensors or other third parties. We do not control the content or the links that appear on these websites, and we are not responsible for the practices employed by websites linked to or from our Website. In addition, these websites, products, and services, including their content and links, may be constantly changing. These websites, products and services may have their own privacy notices, user terms, and customer service policies. Browsing and interaction on any other website, including websites that are linked to or from our Website, are subject to the terms and policies of that website.

10. Changes to the Privacy Notice

The Privacy Notice may be changed from time to time. Please check our Privacy Notice frequently. The new Privacy Notice will be effective immediately upon posting on our Website. If we change our Privacy Notice significantly, then we will state so on our Website together with the revised Privacy Notice.

11. Children's Information

Our Services are not intended for use by children under the age of 13, and we do not knowingly collect Personal Data from children under 13 years of age.

If you are a parent or legal guardian and believe that a child under the age of 13 has provided us with Personal Data without your consent, please contact us using the contact details provided in this Privacy Notice. Upon becoming aware that we have collected Personal Data from a child under 13 without appropriate consent, we will take reasonable steps to delete such information promptly.

Where applicable law requires a higher age threshold for the lawful processing of Personal Data of minors, we comply with those requirements.

12. Your rights as a data subject and contact data



You are always entitled to file a complaint with a data protection supervisory authority if you believe that we are not processing your personal data in accordance with the GDPR. In the Netherlands, the supervisory authority for data protection is:

Autoriteit Persoonsgegevens
Website: https://www.autoriteitpersoonsgegevens.nl

If you have questions or concerns about this Privacy Notice or your privacy, you can contact us at privacy@iconic.works.

Representative

EU Representative

Under Article 27 of the General Data Protection Regulation (GDPR), we have appointed an EU Representative to act as our data protection agent within the European Union.

Our nominated EU Representative is:

Instant EU GDPR Representative Ltd.
Attn: Adam Brogden
Email: contact@gdprlocal.com
Tel: +353 1 554 9700
Office 2, 12A Lower Main Street, Lucan, Co. Dublin K78 X5P8, Ireland

UK Representative

Under Article 27 of the UK General Data Protection Regulation and the Data Protection Act 2018, we have appointed a UK Representative to act as our data protection agent within the United Kingdom.

Our nominated UK Representative is:

GDPR Local Ltd.
Attn: Adam Brogden
Email: contact@gdprlocal.com
Tel: +44 1772 217800
1st Floor Front Suite, 27–29 North Street, Brighton, England

Iconic Works B.V.

Keizersgracht 452, 1016GD Amsterdam

E: privacy@iconic.works

W: iconic.works

Chamber of Commerce: 96927763