

Privacy Statement – for Customers (B2B)

Version: 1.0 (October 2025)

Controller: The client organization

Processor: CareerTracker B.V.

Contact: info@careertracker.nl

1. Purpose and Scope

This privacy statement describes how CareerTracker processes personal data on behalf of its customers.

2. Description of Processing

CareerTracker processes data to support goal setting, performance management, feedback, reflection, and progress tracking.

3. Categories of Data

Identification data (name, email), professional data (role, department, goals), and interaction data (feedback, reflections).

4. Data Retention

Data is retained only as long as necessary for service delivery or per controller instructions.

5. Data Storage and Transfers

Data is stored in Microsoft Azure (Netherlands/Ireland). SendGrid (USA, DPF-compliant) is used for email notifications.

6. Security Measures

Data encryption, access control, Azure AD authentication, logging, and breach notification within 48 hours.

7. Subprocessors

Microsoft (Azure) and SendGrid (Twilio Inc.) are approved subprocessors.

8. Rights and Compliance

CareerTracker assists customers with GDPR compliance, data subject requests, and audits.

9. Contact

For questions: info@careertracker.nl