

PRIVACY POLICY Klik B.V.

Last updated: 2 January 2026

This Privacy Policy explains how **Klik B.V.** (“we”, “us” or “our”) collects and processes personal data when you use our web application Klik and related services (the “Service”). The Service enables business customers to create an account, generate job vacancy content using AI based on customer inputs, publish vacancies to a hosted vacancy URL, and where enabled and authorised connect to Meta (Facebook and Instagram) to publish and or advertise vacancies.

This Privacy Policy complies with the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and the Dutch GDPR Implementation Act (Uitvoeringswet AVG).

Provision of personal data is not a statutory requirement. However, certain personal data is necessary to provide the Service. Failure to provide required data may result in our inability to deliver the Service or certain features thereof.

1. WHO WE ARE AND HOW TO CONTACT US

Controller

Klik B.V., a company incorporated under the laws of the Netherlands, with registered address at Dorpsstraat 145 d, (3925 KA) Scherpenzeel, registered under number 98220314, is the controller for the processing of personal data described in this Privacy Policy, unless stated otherwise.

Contact

If you have any questions or requests, you can contact us at:

Email: justin@klikmarketing.nl

Postal address: Dorpsstraat 145 d, (3925 KA) Scherpenzeel

2. WHO THIS POLICY APPLIES TO

2.1 Business users (customers)

If you create and use an account as a business user, we process your personal data to provide the Service to you and to your organisation.

2.2 Job applicants and visitors of vacancy pages

Our customers may publish vacancies via a public vacancy URL generated by the Service. Depending on the configuration chosen by the customer, job applicants may be able to submit information to the customer, for example via a form or external channels. In such cases, the customer generally acts as the controller of applicant data and we act as a processor on the customer’s behalf where we host or transmit such applicant data. If you are a job applicant and wish to exercise rights relating to your application data, you should generally contact the relevant customer first.

3. HOW WE COLLECT DATA

3.1 Data we generate

We generate AI-generated vacancy text and variants based on inputs from the customer, as well as publication metadata such as status, timestamps, and logs relating to publishing and advertising actions.

3.2 Data you provide to us

We collect account and contact data such as name, business email address, optional phone number, role or title, and login credentials. We also collect company and vacancy inputs such as company descriptions, role requirements, location, salary ranges, benefits, and uploaded files where enabled. Support communications including emails, chat messages, tickets, and attachments are also collected.

3.3 Data collected automatically

We collect technical and usage data including IP address, browser type, device information, operating system, referral URLs, log files, timestamps, error logs, and interaction data. Cookie and similar technology data is collected as described in Section 11.

4. CONNECTING YOUR ACCOUNT WITH META

4.1 If you connect your account with Meta, we may process the following data depending on the permissions you authorize:

- a) We process account and profile data such as your name, email address, and profile picture (avatar) provided by Meta for the purpose of connecting your account.
- b) We process selected business assets including the Facebook Page you select for publishing or advertising, including Page name and Page ID, and the Meta advertising account you select, including Ad Account ID.
- c) We process other 'advertising data' including Ad ID and creation timestamp, Creative ID and creation timestamp, and campaign and ad set identifiers where applicable, for the purpose of tracking and monitoring advertisements within Meta and verifying their proper performance and delivery.
- d) We process advertising performance data including impressions or views, clicks, reach, CPC, CTR, and advertising spend for ads created via the Service, for the purposes of (i) providing performance insights and reporting to our customers, and (ii) optimizing and improving the effectiveness of advertising campaigns.

We only process Meta data that is necessary to connect your account, run job vacancy advertising, provide reporting within the Service, and troubleshoot or verify that advertisements are running correctly. We do not access private messages or non-selected business assets.

5. PURPOSES OF PROCESSING AND LEGAL BASES

5.1 We process data to provide the Service, including account creation, vacancy generation, hosting of vacancy pages, and core functionality. The legal basis is performance of a contract under Article 6(1)(b) GDPR.

5.2 We process data to enable Meta account connection and advertising, including maintaining connection status, creating and managing advertisements, and retrieving reporting data. The legal basis is performance of a contract under Article 6(1)(b) GDPR and, where applicable, our legitimate interests under Article 6(1)(f) GDPR in providing integrated advertising functionality and improving our services.

5.3 We process data to provide insights that enable customers to optimise, including displaying advertising results and helping users improve job vacancy campaigns. The legal basis is performance of a contract under Article 6(1)(b) GDPR and our legitimate interests under Article 6(1)(f) GDPR in providing analytics and optimization features to improve service quality and customer outcomes.

5.4 We process data for billing, subscription management, invoicing, payment processing, and fraud prevention. The legal basis is performance of a contract under Article 6(1)(b) GDPR, compliance with legal obligations under Article 6(1)(c) GDPR (including tax and accounting laws), and our legitimate interests under Article 6(1)(f) GDPR in preventing fraud and ensuring payment security.

5.5 We process data for customer support, security monitoring, abuse prevention, and compliance with legal requirements. The legal basis is compliance with legal obligations under Article 6(1)(c) GDPR and our legitimate interests under Article 6(1)(f) GDPR in ensuring the security and integrity of our systems, preventing abuse, and protecting the rights and safety of our customers and third parties.

6. SHARING OF PERSONAL DATA

6.1 We do not sell or rent your personal data to third parties.

6.2 We may share your personal data with the following categories of recipients:

- a) Service providers: We engage third-party service providers who process personal data on our behalf as data processors, including:
 - Cloud hosting and infrastructure providers
 - Payment processing services
 - Email delivery services
- b) Third-Party integrations: Where you explicitly connect your account to third-party services (such as Meta or other platforms), we will share the personal data necessary to enable the integration you have requested.

- c) Legal obligations: We may disclose your personal data where required to do so by law, court order, or other legal process.
- d) Professional advisers: We may share personal data with lawyers, accountants, auditors, and other professional advisers who assist us in operating our business, subject to confidentiality obligations.

7. INTERNATIONAL DATA TRANSFERS

7.1 Personal data may be transferred to and processed in countries outside the European Economic Area (EEA). Where we transfer personal data outside the EEA, we implement appropriate safeguards, including Standard Contractual Clauses approved by the European Commission, adequacy decisions, or other legally recognized transfer mechanisms.

8. DATA RETENTION

8.1 We retain personal data only for as long as necessary to fulfill the purposes for which it was collected, including to satisfy any legal, accounting, or reporting requirements.

8.2 Business account data is retained for the duration of the account plus up to 12 months thereafter to handle any post-termination matters. Billing and transaction data is retained for at least 7 years as required by Dutch tax law. Meta access tokens and connection data are retained while the Meta connection is active and are deleted or revoked when you disconnect your Meta account or request deletion, subject to technical and legal constraints. Advertising identifiers and performance data are retained for as long as needed to provide reporting and troubleshooting functionality, and are deleted or anonymised upon request unless retention is required by law. Security logs are retained for a limited period of 12 months for security and compliance purposes.

9. SECURITY

9.1 We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk. These measures include, but are not limited to: access controls and authentication mechanisms, encryption of personal data in transit and at rest where appropriate, regular security monitoring, pseudonymisation where applicable, measures to ensure ongoing confidentiality, integrity, availability and resilience of processing systems, and regular testing and evaluation of the effectiveness of security measures. However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security.

10. YOUR RIGHTS

10.1 Under the General Data Protection Regulation (GDPR), you have the following rights regarding your personal data:

- a) **Right of access:** You have the right to obtain confirmation as to whether we process your personal data and, if so, to access that data and receive information about the processing.
- b) **Right to rectification:** You have the right to have inaccurate personal data corrected and incomplete personal data completed.
- c) **Right to erasure:** You have the right to request deletion of your personal data in certain circumstances, such as when the data is no longer necessary for the purposes for which it was collected.
- d) **Right to restriction of processing:** You have the right to request restriction of processing of your personal data in certain circumstances.
- e) **Right to data portability:** You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit that data to another controller.
- f) **Right to object:** You have the right to object to processing of your personal data.
- g) **Right to withdraw consent:** Where processing is based on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- h) **Right to lodge a complaint:** You have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) if you believe your rights have been violated. Contact details: www.autoriteitpersoonsgegevens.nl.

10.2 To exercise any of these rights, please submit your request using the contact details provided in Section 1. We will respond to your request within one month of receipt, though this period may be extended by two additional months where necessary, taking into account the complexity and number of requests. We will inform you of any such extension within one month of receipt of your request, together with the reasons for the delay.

10.3 We may request additional information to verify your identity before processing your request. We will not charge a fee for processing your request unless it is manifestly unfounded or excessive, in which case we may charge a reasonable fee or refuse to act on the request.

11. COOKIES

11.1 We use cookies and similar technologies to operate and secure the Service and, where enabled, analyse usage. For more detailed information about the cookies we use, please see our separate Cookie Policy.

12. DATA DELETION REQUESTS

12.1 You may request deletion of your personal data at any time. Send an email to justin@klikmarketing.nl with subject "Data Deletion Request", including the email address associated with your account and sufficient information to verify your identity. After verification, we will delete or anonymise your data unless retention is required for legal obligations or legal claims. Where applicable, stored Meta connection data such as access tokens and identifiers will also be removed.

13. THIRD-PARTY SERVICES

13.1 The Service integrates with third-party platforms, including Meta (Facebook and Instagram). When you connect your account to Meta or use Meta's services through our platform, your personal data will be processed by Meta in accordance with Meta's privacy policies. We recommend that you review Meta's privacy policy at <https://www.facebook.com/privacy/policy/> to understand how Meta processes your personal data. We are not responsible for the privacy practices of third-party platforms.

14. PERSONAL DATA OF CHILDREN

14.1 The Service is intended exclusively for business use and is not directed at individuals under the age of 16. We do not knowingly collect personal data from individuals under 16. If we become aware that we have collected personal data from a child under 16 without parental consent, we will take steps to delete such information as soon as possible.

15. CHANGES TO THIS POLICY

15.1 We may update this Privacy Policy from time to time. Any changes will be posted on this page with an updated "Last updated" date. For material changes that significantly affect your rights, we will notify you via email or through a prominent notice on our website at least 30 days before the changes take effect. Your continued use of our services after such changes constitutes acceptance of the updated Privacy Policy.