

# Specific privacy policy statement for the Flemish Career Survey

Below is the specific privacy policy statement applicable to the Flemish Career Survey. For the general privacy policy statement of the Public Employment Service of Flanders, we refer to the website [www.vdab.be/privacy](http://www.vdab.be/privacy).

## Introduction

The Public Employment Service of Flanders (VDAB) develops and publishes the Flemish Career Survey. The Flemish Career Survey has the ambition to map citizens' experience in the Flemish labour market. This involves a maximum of 56 fixed questions each edition, supplemented by a number of variable questions yet to be determined.

Through this citizen survey, a representative group of residents from each province are asked about their experiences, satisfaction and behaviour in the labour market. This is done by means of a digital-first approach, but supplemented where necessary with physical data collection based on paper surveys to ensure an inclusive data collection method. The purpose of the survey is to obtain representative results at the Flemish and provincial levels.

We value your privacy. All this is within the framework of the European 'General Data Protection Regulation' (hereinafter referred to as GDPR), which took effect on 25 May 2018. Therefore, in the context of the Flemish Career Survey, the text below tells you what personal data we process in what way to turn it into generic numerical tables at the Flemish and provincial levels. At the same time, we inform you about what your rights are regarding data processing and privacy. We perform analyses only at the Flemish and provincial levels: the data you enter in the survey are processed in a way that makes your personal data unrecognisable, so that your privacy remains protected. We emphasise that completing this survey will in no way affect you.



## Parties involved

### The VDAB as controller

The VDAB is the controller within the meaning of the GDPR. This means that, in principle, the VDAB decides what personal data are processed, for what purpose and in what way. The VDAB is responsible for the proper and careful processing of the personal data of participants in the Flemish Career Survey in accordance with the GDPR.

### Statistics Belgium as joint controller/Trusted Third Party (TTP)

Statistics Belgium (StatBel) is responsible for the coordination of the development, production and dissemination of Flemish official statistics, and their quality management. In the context of the Flemish Career Survey, Statistics Belgium acts as a joint controller, in particular as a Trusted Third Party (TTP). This means that Statistics Belgium ensures that data are pseudonymised before they are transmitted to the VDAB.

For more information, please visit the [Statistics Belgium](#) website.

A cooperation agreement between the VDAB and Statistics Belgium defines how and under what conditions Statistics Belgium must handle the personal data.

### Ipsos as processor/fieldwork agency

To provide support in conducting this citizen survey, the VDAB has appointed a processor/fieldwork agency, specifically Ipsos. This agency is responsible for the online survey, the printing, handling and processing of the questionnaires presented to citizens within the framework of the Flemish Career Survey. Ipsos uses (sub-processors) Mastermail and bpost to send the invitations and questionnaires to you.

A processing agreement between the VDAB and Ipsos defines how and under what conditions Ipsos must handle the personal data. More information about data processing by Ipsos can be found on [the Ipsos website](#).



## Purposes of processing

When you participate in the Flemish Career Survey, we ask you to provide your opinions and information in the form of answers to the survey questions. This input is used to conduct the Flemish Career Survey and to provide policy information at the regional and provincial levels. Consequently, the survey results are processed for scientific and historical research and statistical purposes.

## What personal data is collected and by whom?

In the context of creating the Flemish Career Survey, personal data are processed in two distinct streams, namely the personal data from the National Register, and the personal data from the survey results.

### Stream 1: Personal data from the National Register

Citizens receive an invitation by post to complete the Flemish Career Survey. They are notified based on a sample drawn from the National Register. The personal data below are received from the National Register for the following reasons:

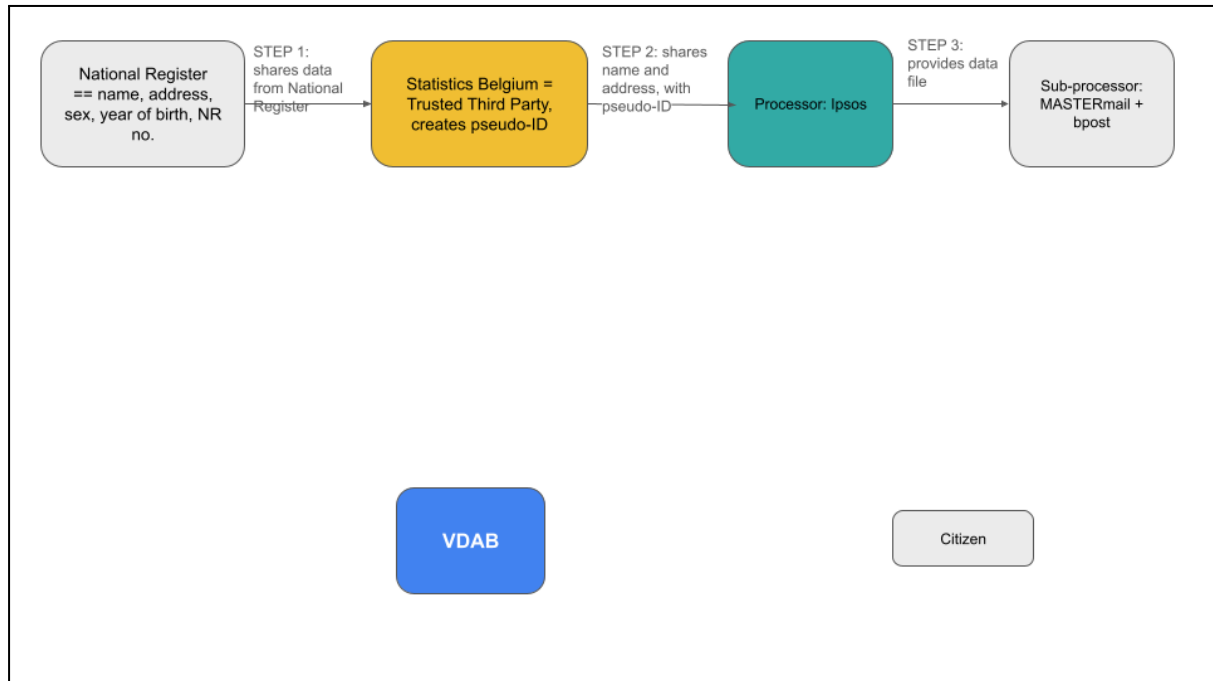
- The citizen's surname and first name: in order to notify the citizen
- Address: to reach the citizen at the correct address
- Sex and year of birth: to ensure a reflection of the population in each province, thus ensuring a representative sample for the region and in each province, in which everyone has an equal chance to participate.
- National registration number: to enable the creation of a repeated panel, we also request citizens' national registration number. This number remains with StatBel, and is immediately encrypted by them in the form of a pseudo-ID. They only use this to contact citizens who have explicitly agreed to this in future editions. The use of the national registration number guarantees that the most recent contact details can be used.

To be able to draw this sample, [authorisation](#) has been obtained from the National Register.

Given the GDPR and [the Belgian transposition act of 30 July 2018](#), these data are not provided to the VDAB. In order to maintain a balance between the right to respect for privacy and the possibility to conduct research, it is necessary for statistical surveys that cannot be conducted with anonymous data to appoint a trusted third party or intermediary who will

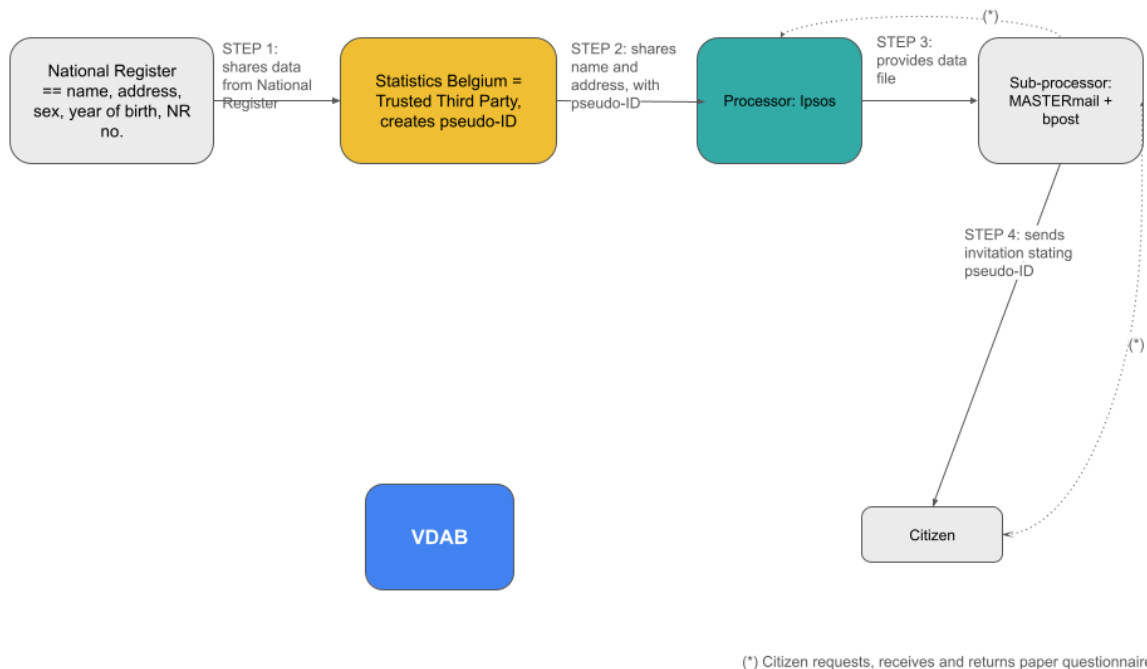


encrypt the data. This is referred to as a 'Trusted Third Party'. Therefore, the VDAB relies on a Trusted Third Party, specifically Statistics Belgium. Consequently, Statistics Belgium will receive the personal data from the National Register and provide the necessary data (= surname and first name, address) to the fieldwork agency Ipsos (steps 1 and 2).



Ipsos acts as a processor for the VDAB and in turn calls on Mastermail, which, as a sub-processor, is responsible for printing the envelopes, the written questionnaires and the letters inviting to participate in the survey. Mastermail works together with bpost to send the letters by post to the citizens included in the sample. In order to send these letters, Mastermail and bpost obtain the names and addresses of the citizens in the sample (steps 3 and 4).





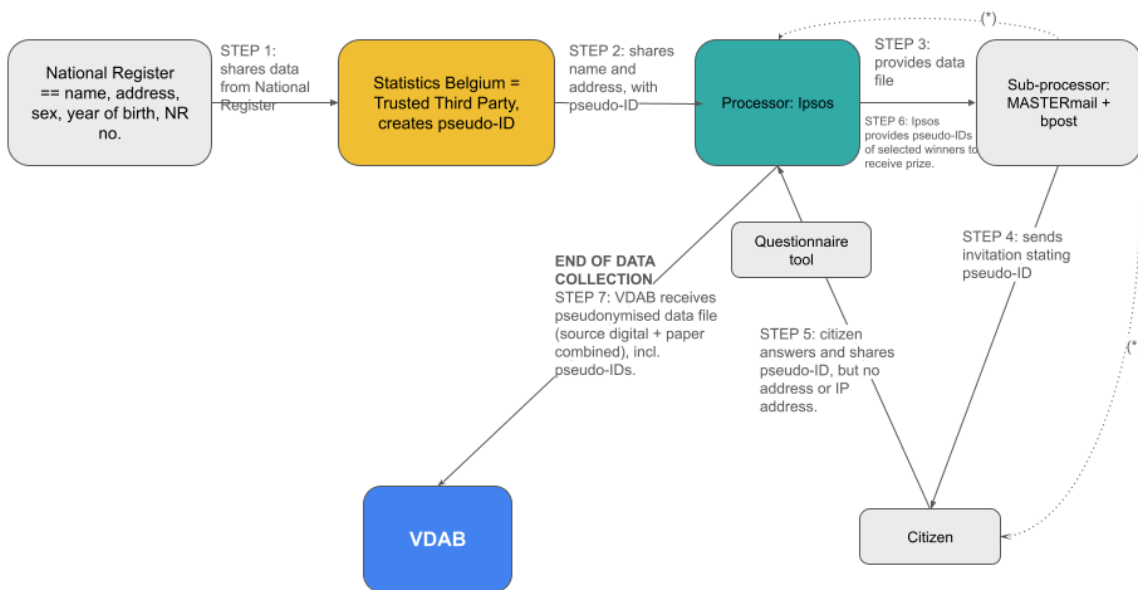
## Stream 2: Personal data from the survey results

The citizen survey asks questions related to different types of personal data. Specifically, throughout the citizen survey, personal data relating to the following categories are covered:

- age, sex, nationality
- living habits
- family composition
- education and training
- occupation and job (which includes questions about career satisfaction and working conditions)
- personal particulars (including relating to health)

After completing your survey results, digitally or on paper (step 5), the fieldwork agency Ipsos will initially process these survey results into a survey data file (step 7). This is a large spreadsheet file that contains all the responses of all the respondents. Ipsos is responsible for the pseudonymisation of this data file. In parallel, Ipsos again delivers to Mastermail the selection of participants who may receive an incentive based on the competition. They will contact these participants personally using the contact information available.





(\*) Citizen requests, receives and returns paper questionnaire

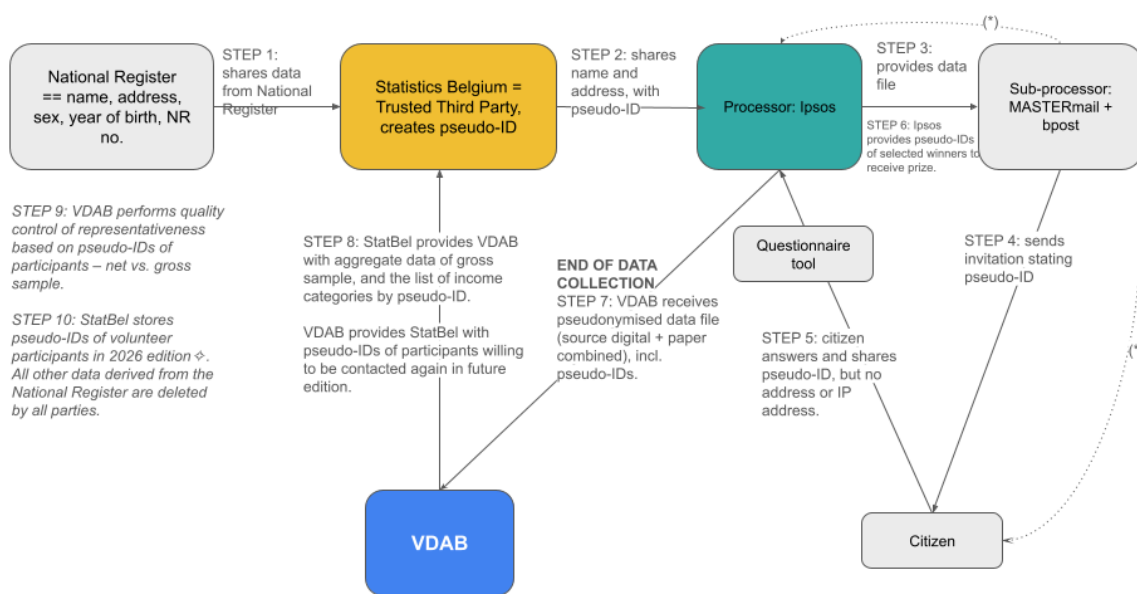


## Pseudonymisation of personal data from survey results and combination with existing administrative data

Ipsos will pseudonymise the survey data file. This means that Ipsos will remove any link between the personal data as received from the National Register and the data entered by citizens (with consent). The VDAB receives this data file (step 7).

After the survey data file is delivered to the VDAB, the VDAB will deliver a file containing only the pseudo-IDs of the net sample to StatBel, which in turn will add additional data (income categories) and return the file. At no time does StatBel have access to the entire survey database. This linkage is governed by the cooperation agreement that is drawn up between the VDAB and StatBel (step 8).

StatBel then returns this income data to the VDAB, which adds this information to the pseudonymised survey file. Based on this dataset, content processing begins. At this moment, StatBel deletes all data coming from the National Register, except for the data of participants who have given explicit consent for their storage (see 'storage of panel data').



◇ StatBel uses encryption to go back from pseudo-ID to NR no.

(\*) Citizen requests, receives and returns paper questionnaire



## Sample control

StatBel provides the VDAB with an aggregated, anonymised dataset that includes an overview of the gross sample (step 8). This will allow the VDAB to perform quality control and see if the net sample contains enough data from the appropriate strata to make representative statements about the population (step 9). If not, the VDAB can use this information to weight the results in order to correctly represent certain underrepresented groups in the results.

## Storage of panel data (step 10)

The Flemish Career Survey 2024 is the first edition of a biennial survey. In each edition, participants will be able to indicate whether they would like to be invited to participate again in the next edition. The VDAB will provide a separate data file containing all pseudo-IDs of this selection of participants to StatBel, which will keep them until the next edition's contact file is prepared. At that time, these pseudo-IDs will be used to retrieve the surnames, first names and address information of these individuals from the National Register again and add them to the new gross sample. StatBel will then delete the data file in which this selection from the last edition was kept. We identify these participants over the years thanks to their pseudo-IDs.

## Basis of processing

The VDAB must be able to base the use of personal data on one of the legal bases in Article 6 of the GDPR.

## Personal data from the National Register

Pursuant to Article 5 of [the Decree establishing the externally autonomous agency under public law 'Public Employment Service of Flanders'](#), the VDAB's mission is 'to collect and disseminate knowledge about the labour market and its functioning' and 'to provide transparent and reliable labour market information'. Therefore, the processing of personal data from the National Register is based on a task carried out in the public interest.

StatBel acts as a Trusted Third Party and in that role receives the data from the National Register. The processing of this data is done on the basis of a task carried out in the public interest, derived from the statutory mission of Statistics Belgium to develop official statistics.





Consequently, StatBel has been authorised by the National Register to act as a Trusted Third Party for the VDAB in the context of the Flemish Career Survey.

Thus, the receipt of personal data from the National Register relies on Article 6(1)(c) (compliance with a legal obligation) and (e) (a task carried out in the public interest) of the GDPR.

## Personal data from the survey results

Prior to completing the citizen survey, participants must explicitly give their consent for their responses to be further used for the Flemish Career Survey and further (scientific/policy-relevant) research. Thus, this further processing relies primarily on Article 6(1)(a) GDPR.

For the processing of income data as provided by StatBel, Article 6(1)(e) GDPR provides the basis for processing by the VDAB. The VDAB processes this income data within its directing task to ensure that career services can be adjusted based on insights derived from a representative monitor, which can be considered a task carried out in the public interest.

## Data processing in relation to the use of a survey tool

The survey tool in which you enter your data is provided by the fieldwork agency Ipsos on behalf of the VDAB. This survey tool does not use tracking software or cookies. Only the unique code, browser, device and operating system used are stored in the data collected. This data is deleted immediately after the citizen survey is completed.

You have the right to view, modify or delete this personal data at any time. Please contact [onderzoek@vdab.be](mailto:onderzoek@vdab.be) or contact the fieldwork agency Ipsos, Data Protection Officer, Rooigemlaan 2 bus 4, B-9000 Ghent, or at [dpo.belgium@ipsos.com](mailto:dpo.belgium@ipsos.com).

## Retention period and location

The parties involved may not keep your personal data any longer than necessary for the purpose of the data processing (Article 5(1)(e) GDPR). This means that StatBel and the fieldwork agency Ipsos will destroy the personal data from the National Register as well as the personal data from the survey results as soon as Ipsos has provided the pseudonymised survey data file to the VDAB. Ipsos will then also destroy the pseudonymised survey data file. For StatBel, this excludes data from explicitly consenting panellists.



This destruction takes place as soon as possible, after verification by the VDAB (no later than six months after the completion of the survey for the fieldwork agency Ipsos and for StatBel). As of the time of destruction, StatBel and the fieldwork agency Ipsos no longer possess any personal data. Obviously, this also impacts your ability to exercise your privacy rights.

The VDAB does not retain the received pseudonymised survey data file any longer than necessary in the context of scientific, statistical and historical research. Appropriate security measures are taken for the storage of this survey data file.

The VDAB, Statbel and Ipsos process personal data received by them exclusively within the European Economic Area and outside the application of the U.S. Foreign Intelligence Surveillance Act (FISA).

## Security of personal data

Article 32 of the GDPR requires the VDAB, Statbel and the fieldwork agency Ipsos to take appropriate technical and organisational measures to prevent the loss of personal data or unlawful processing.

The VDAB, Statbel and the fieldwork agency Ipsos therefore ensure the appropriate security of the personal data they process, in line with the applicable legal requirements and guidelines. Thus, only a limited number of employees of the parties involved have access to personal data from the National Register and personal data from the survey results, and only when this is necessary in the context of the preparation of the Flemish Career Survey.

The VDAB uses the minimum security measures of the Flemish Government's Information Classification Framework. This ensures that appropriate technical and organisational measures are taken to manage security risks related to the network and information systems and to prevent incidents.

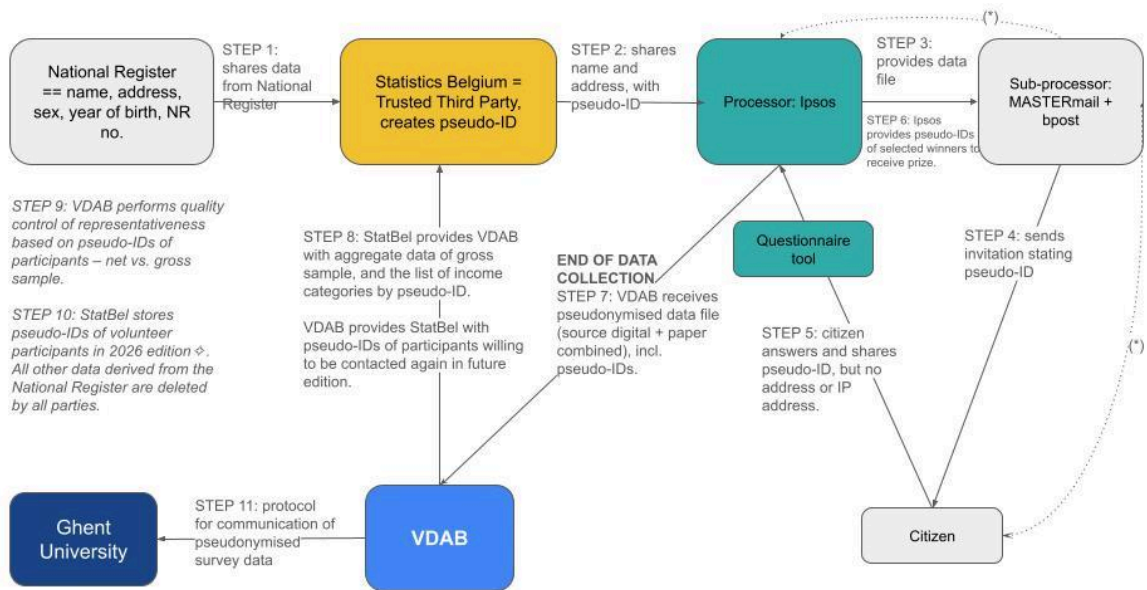
## Provision to third parties

The pseudonymised survey data file will be provided to the following parties by the VDAB.

Ghent University will receive the pseudonymised survey results and will be able to use them for its own scientific research. For the exchange of the pseudonymised survey results



between the VDAB and Ghent University, a protocol is concluded (step 11). This protocol can be consulted at any time upon request.



◊ StatBel uses encryption to go back from pseudo-ID to NR no.

(\*) Citizen requests, receives and returns paper questionnaire

In addition, the VDAB also expects a lot of requests for scientific research on the pseudonymised survey data. A protocol is also concluded for the exchange in the context of scientific research if the data cannot be delivered at an aggregate level. Important in this respect: The VDAB will always examine which data from the completed survey is actually required to achieve the scientific purposes. In other words, the VDAB will not always exchange the entire pseudonymised data file. The protocols regarding the exchange of pseudonymised survey results in the context of scientific research will be listed here, and are always available upon request.



# Your privacy rights

## What rights?

Regarding data protection and processing, you have the following rights:

- Right to know what happens to your personal data;
- Right to inspect and receive a copy of your data. For the personal data from the survey results, we guarantee this right by offering you the possibility to request a copy of your answers after completing the survey (as long as it is possible to identify you and your answers);
- Right to modify, supplement or correct this data (as long as it is possible to identify you and your answers);
- Right to be forgotten, or to deletion of your data (as long as it is possible to identify you and your answers);
- Right to withdraw consent to the storage or processing of your data (as long as it is possible to identify you and your answers);
- Right to portability;
- Right to refuse automated individual decision-making or profiling;
- Right to restriction of processing.

## Who and how to contact?

If you wish to exercise your rights under the GDPR, you can always contact the VDAB, Statbel and/or the fieldwork agency Ipsos using the contact details below:

- Public Employment Service of Flanders (VDAB), Data Protection Officer (DPO), Re: Privacy rights request, Boulevard de l'Empereur 11, B-1000 Brussels. Free service number: +32 (0)800 30 700.
- Statistics Belgium. More information about privacy and data protection at [Statistics Belgium](#)
- Ipsos NV, Data Protection Officer (DPO), Rooigemlaan 2/4, B-9000 Ghent or via [dpo.belgium@ipsos.com](mailto:dpo.belgium@ipsos.com).



## Internal handling of your requests

As stated above, you can address your requests to exercise your rights to any party. However, a clear internal handling procedure has been agreed upon between the parties involved. This is necessary since Statbel and the fieldwork agency Ipsos will destroy the personal data once the pseudonymised survey data file is delivered to the VDAB. Furthermore, the VDAB will only have the pseudonymised survey data file at its disposal. It is emphasised that the VDAB will at no time receive the (non-pseudonymised) personal data (from the survey) of the data subject who exercises the request. Therefore, we are happy to explain the handling procedure to you.

For requests submitted prior to the transfer of the pseudonymised survey data file to the VDAB:

- If a data subject directs his or her request to the fieldwork agency Ipsos and/or to Statbel, these parties will inform each other without delay and will jointly assess the request. The VDAB will be informed promptly of the request, as well as the result of the assessment of the request. After the VDAB's approval, the result will be delivered to the data subject.
- If a data subject addresses his or her request to the VDAB, the VDAB will promptly notify Statbel and the fieldwork agency Ipsos of this request. The latter two parties will jointly assess the request. After the VDAB's approval, the result will be delivered to the data subject.

For requests submitted after the transfer of the pseudonymised survey data file to the VDAB, but before the destruction of the personal data by Statbel:

- If the data subject directs his or her request to Statbel, Statbel will contact the VDAB and they will jointly assess the request and notify the data subject of the result.
- If the data subject directs his or her request to the VDAB, the VDAB will contact Statbel and they will jointly assess the request and notify the data subject of the result.
- If the data subject addresses his or her request to the fieldwork agency Ipsos, they will promptly notify Statbel and the VDAB of this request. Since Ipsos no longer has the data after the transfer of the pseudonymised file, the VDAB and Statbel will jointly assess the request and inform the data subject.

For requests submitted after the destruction of the processed personal data by Statbel and the fieldwork agency Ipsos:



- If the data subject addresses his or her request to StatBel or Ipsos, the Flemish Statistical Authority or Ipsos will promptly notify the VDAB of this request. The VDAB will then assess this request.
- If the data subject addresses his or her request to the VDAB, the VDAB will assess the request.

## Possibility to file a complaint

If you have a complaint about the processing of your personal data or about the exercise of your rights, please contact us directly about this (see contact details at the bottom of this page).

You have the right to file a complaint with the Data Protection Authority (DPA) at any time. This is the federal supervisory authority on personal data protection. After completing the [complaint form](#), you can send it by post (f.a.o. Data Protection Authority, Rue de la Presse 35, B-1000 Brussels) or by e-mail.

In addition, you can file a complaint about a Flemish agency (such as the VDAB) with the Flemish Supervisory Committee for the Processing of Personal Data (VTC), which only has jurisdiction over Flemish government agencies. After completing the [complaint form](#), you can send it by post (f.a.o. Flemish Supervisory Committee (VTC), Avenue du Roi Albert II 15, B-1210 Brussels) or by email.

## Relevant documents

- [Authorisation 034/2024 from the National Register to draw a sample](#)
- Processing agreement VDAB and StatBel: available upon request
- Possible addendums: available upon request
- Data sharing protocol Ghent University: available upon request
- Cooperation agreement Ipsos: available upon request

## Provision of personal data to scientific researchers

For now, the VDAB has not received any applications. As applications come in, they will be included here.



## Contact details

Vlaamse Dienst voor Arbeidsbemiddeling en Beroepsopleiding (VDAB), Data Protection Officer (DPO), Betreft: Privacy rights request, Boulevard de l'Empereur 11, B-1000 Brussels. Free service number: +32 (0)800 30 700. Email: [privacy@vdab.be](mailto:privacy@vdab.be).

See also the VDAB's [general privacy policy statement on research](#) for more information about your privacy rights.

A translated or printed version of this document is always available upon request. To this end, you can use the contact details above.

