

Commexce Privacy Notice — MVP / Test Phase

Last updated: **8th of July, 2026**

This Privacy Notice explains how personal data is processed when using Commexce during the MVP, pilot and test phase.

Commexce is an AI-assisted recruitment platform for Commercial Excellence roles. The platform is used to structure candidate profiles, analyse vacancies, support candidate matching and generate shortlists.

1. Who offers Commexce?

Commexce is offered during the MVP and test phase by the following parties:

1. BF Data Consultancy B.V., registered with the Dutch Chamber of Commerce under number 90904281, located at Lokomotiefstraat 48, 7331AC, Apeldoorn; and
2. Pricing Professionals, registered with the Dutch Chamber of Commerce under number 96411465, located at Van Heuven Goedhartlaan 121, 1181 KK Amstelveen.

Together, these parties are referred to as the “Commexce Partners”.

For privacy questions, data subject requests or complaints, contact us at:

hello@commexce.com

2. Roles and responsibilities

The Commexce Partners jointly offer Commexce for MVP, pilot and recruitment purposes.

Unless agreed otherwise in writing:

- BF Data Consultancy B.V. is primarily responsible for the technical platform, hosting, application security, AI processing setup, database storage, file storage and platform operation.
- Pricing Professionals is primarily responsible for client acquisition, candidate and company relationships, vacancy intake, recruitment context and commercial use of Commexce output.
- Both Commexce Partners may process relevant candidate, vacancy and matching data for the agreed MVP, pilot, test or recruitment purpose.
- Data subject requests can be sent to hello@commexce.com. The Commexce Partners will coordinate internally to respond to such requests.

Where the Commexce Partners jointly determine the purposes and means of processing personal data, they act as joint controllers within the meaning of Article 26 GDPR.

Candidates and other individuals may exercise their privacy rights against either Commexce Partner.

3. What personal data do we process?

We may process the following personal data.

Candidate data

- name and contact details;
- CV and information extracted from the CV;
- answers to intake questions;
- work experience, education and qualifications;
- seniority, skills, industries, tools and functional areas;
- availability, location, relocation preferences, salary expectations and career preferences;
- AI-generated profile summaries, tags, structured fields, match explanations and match scores;
- communication with Commexce or one of the Commexce Partners.

Company, client and vacancy data

- name, role and contact details of company representatives;
- company name and general company information;
- vacancy descriptions and role requirements;
- hiring criteria, must-have requirements and preferences;
- feedback on candidate profiles, matches, shortlists or platform output;
- communication with Commexce or one of the Commexce Partners.

Technical data

- account and login data;
- access logs;
- usage logs;
- error logs;
- security logs;
- metadata needed to operate, secure, monitor and improve the platform.

4. Sensitive personal data

Users should not upload unnecessary sensitive personal data, such as:

- health data;
- citizen service numbers or national identification numbers;

- criminal records;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- racial or ethnic origin;
- information about sexual orientation;
- other special category data that is not relevant to recruitment.

If such data is included in a CV, intake response or other uploaded document, we do not intentionally use it for matching, scoring or selection.

5. Why do we process personal data?

We process personal data for the following purposes:

- creating candidate profiles;
- analysing CVs and intake responses;
- extracting and structuring professional experience, skills and preferences;
- analysing vacancies and hiring criteria;
- supporting candidate-to-vacancy matching;
- generating shortlists, profile summaries and match explanations;
- communicating with candidates, companies, clients and test users;
- running MVP tests, pilots and recruitment processes;
- improving, debugging and securing the platform;
- monitoring usage and resolving technical issues;
- complying with legal obligations.

Commexce does not make final automated hiring, rejection or selection decisions. AI output is used as decision support only. Human review remains required before Commexce output is used in an actual recruitment process.

6. Legal bases

Depending on the situation, we process personal data based on one or more of the following legal bases:

- consent;
- performance of a contract or pre-contractual steps;
- legitimate interests, such as testing, improving, securing and operating the platform;
- compliance with legal obligations.

Where processing is based on consent, consent may be withdrawn at any time. Withdrawal does not affect processing that already took place lawfully before consent was withdrawn.

7. Use of AI

Commexce uses AI to support recruitment-related analysis and structuring.

AI may be used to:

- extract relevant information from CVs;
- structure candidate profiles;
- summarise candidate experience;
- classify skills, industries, seniority and functional areas;
- analyse vacancy requirements;
- generate match explanations;
- support shortlist preparation.

AI output may be incomplete, inaccurate or biased. Commexce output must therefore be reviewed by a human before it is used for recruitment decisions.

We do not intentionally use sensitive personal data for AI-based matching or scoring.

8. Third-party service providers

Commexce may use third-party service providers for hosting, storage, email delivery, logging, monitoring and AI processing.

These include:

- hosting and infrastructure: fly.io;
- database: xata.io;
- file storage: tigrisdata.com;
- email delivery: mailjet.com;
- AI processing: Azure OpenAI.

Candidate data, vacancy data and platform data may be processed by these providers where necessary to provide, test, secure and improve Commexce.

We do not sell personal data.

At the moment of writing, data is processed solely in the EU.

9. Sharing personal data

Candidate data may be shared with companies, clients or recruitment partners where this fits the relevant MVP, pilot, test, matching or recruitment purpose.

We aim to share only relevant information, such as:

- candidate profile summaries;
- relevant experience;
- skills and seniority;
- availability and preferences;
- match explanations;
- contact details where appropriate.

Companies, clients and recruitment partners must handle candidate data confidentially and may only use it for the agreed recruitment or test purpose.

10. International transfers

Some service providers may process data outside the European Economic Area.

Where this happens, we aim to use appropriate safeguards, such as adequacy decisions, standard contractual clauses or other legally recognised transfer mechanisms.

11. Retention

During the MVP and test phase, we do not keep personal data longer than necessary.

Indicative retention periods:

- candidate test data: up to 12 months after the test, pilot or recruitment process ends;
- candidate data for active recruitment purposes: as long as needed for the relevant recruitment process, unless deletion is requested earlier;
- company contact and vacancy data: up to 12 months after the last relevant contact;
- technical logs: up to 90 days, unless longer retention is needed for security, debugging, legal claims or legal obligations.

Candidates may request earlier deletion of their data.

12. Security

We take appropriate technical and organisational measures to protect personal data.

These measures may include:

- access controls;
- encrypted connections;
- restricted access to production data;
- secure file storage;
- logging and monitoring;

- separation of development and production environments where appropriate;
- regular review of platform access;
- deletion of data that is no longer needed.

Because Commexce is still in an MVP and test phase, the platform may contain bugs, limitations or incomplete features. Users should only upload data that is necessary for the relevant test, pilot or recruitment purpose.

13. Data subject rights

Depending on the situation, individuals may have the right to:

- access their personal data;
- correct inaccurate personal data;
- request deletion of personal data;
- restrict processing;
- object to processing;
- request data portability;
- withdraw consent;
- lodge a complaint with a supervisory authority.

Requests can be sent to:

hello@commexce.com

We will respond within the applicable legal timeframe.

14. Complaints

If you believe we handle personal data incorrectly, please contact us first at:

hello@commexce.com

You also have the right to lodge a complaint with the Dutch Data Protection Authority or another competent supervisory authority.

15. Changes to this Privacy Notice

We may update this Privacy Notice as Commexce develops.

The latest version will be available at:

<https://commexce.com/privacy/>

If we make material changes, we may notify users through the platform, by email or through another appropriate channel.