

Clarté

Privacy Policy

Last updated: 15 May 2026

Clarté ("**Clarté**", "**it**", "**its**") is committed to protecting the privacy of individuals who interact with its services. This Privacy Policy explains what personal information it collects, why it is collected, how it is used and protected, and what rights you have in relation to it.

Clarté operates from Belgium and provides mentorship and informational services to individuals seeking to explore and apply to higher education programmes in the European Union ("EU").

This Privacy Policy is designed to comply with:

- **The General Data Protection Regulation (EU) 2016/679** ("GDPR");
- **The Belgian Act of 30 July 2018** on the protection of natural persons with regard to the processing of personal data ("**Belgian Privacy Act**"); and
- The mandatory privacy and data protection laws of the Customer's country of residence, to the extent those laws apply and cannot be excluded - see Section 6 below.

Where applicable frameworks overlap, the higher standard of protection applies.

1. Clarté (Data Controller)

Clarté is the data controller responsible for your personal information. Its contact details are:

Business name: Clarté

Email: info@clarteeu.com

Telephone / WhatsApp: +32 456 077 611

If you have any questions about this Privacy Policy or about how Clarté handles your personal information, please contact Clarté at the above details.

2. What Personal Information Clarté Collects

Clarté collects only the personal information that is necessary to deliver its services and operate its business.

2.1 Information You Provide Directly

- Personal details: full name, year of birth, gender identity, email address, and telephone/WhatsApp number;
- Location: home country or state/territory of residence;
- Life stage: whether you are currently in high school, undergraduate or postgraduate study, working, or taking a gap year;
- Educational background: current or most recent high school or university, degree programme, year of study, subjects, units, and academic record where relevant, and whether you have completed or are completing the International Baccalaureate (IB) and/or additional tests;
- Relevant skills, achievements, and certifications: such as language proficiencies, sporting and musical abilities, and technical aptitudes;
- Extracurricular activities and personal achievements: participation in clubs, sports, music, or similar activities, and any achievements you choose to share;
- Study goals and preferences: motivation for EU study, type of study sought, preferred EU countries, preferred subject areas, intended start timeframe, preferred language of study, and openness to bilingual programmes;
- Personal circumstances: EU citizenship status and monthly budget range;
- Guidance priorities: the specific areas in which you are seeking personalised support, which may include universities and programmes, scholarships and funding opportunities, application requirements and deadlines, credit transfer pathways, accommodation, EU-specific personal administration (such as health insurance and residency), student life and culture, and any other areas you identify;
- Referral source: how you heard about Clarté (used for internal business purposes only and not shared with third parties);
- Communications: the content of emails, Enquiry Forms, website contact form submissions, and messages you send to Clarté;
- Additional voluntary information: any further relevant information you choose to provide in your Enquiry Form or in communications with Clarté, such as personal background, circumstances, or preferences that you consider relevant to your study goals. You are under no obligation to provide this information, and providing it constitutes your explicit consent to its use solely for the purpose of delivering the Services you have requested. Clarté will collect and use only such additional information as is relevant and proportionate to that purpose (Article 5(1)(c) GDPR); and
- Payment information: billing details sufficient to process payment. Clarté does not store full card details. Payment processing is handled by a third-party payment processor.

2.2 Information Clarté Generates in the Course of Providing Services

- Session notes and written summaries prepared during or after Mentorship Sessions;
- The contents of your Catalogue (Explore) or Personalised Pathway Plan; and
- Records of services purchased and correspondence exchanged.

2.3 Information Clarté Does Not Collect

Clarté does not collect or process:

- Special categories of personal data (including health data, racial or ethnic origin, political opinions, religious beliefs, biometric data, or criminal records);
- Data through advertising networks, social media trackers, or third-party analytics tools beyond the aggregated, anonymised website traffic data generated by Wix's built-in analytics feature, as described in Section 5.4; and
- Personal data of Authorised Child Users, except where a Customer (as parent or legal guardian) has provided consent for a named Authorised Child User in accordance with Section 7 below.

Clarté does not receive personal data about you from any indirect or third-party source.

3. Lawful Basis for Processing (GDPR)

Under the GDPR, Clarté processes your personal data on the following lawful bases:

- **Contract (Art. 6(1)(b) GDPR):** Processing is necessary to perform the services you have requested or to take steps prior to entering into a service agreement with you. This is the primary basis for most of Clarté's processing.
- **Legitimate interests (Art. 6(1)(f) GDPR):** Processing for purposes such as maintaining service records, defending legal claims, and improving Clarté's services, where these interests are not overridden by your privacy rights.
- **Legal obligation (Art. 6(1)(c) GDPR):** Processing required to comply with applicable Belgian or EU law, including accounting and tax obligations.
- **Consent (Art. 6(1)(a) GDPR):** Where Clarté request's your specific consent for a particular processing activity, including consent provided by a Customer as parent or legal guardian for the processing of an Authorised Child User's personal data.

4. How Clarté Uses Your Personal Information

Clarté uses your personal information for the following purposes:

- To deliver the services you have requested, including preparing your Catalogue, Personalised Pathway Plan, and conducting Mentorship Sessions;
- To communicate with you about your services, including sending written follow-up summaries, invoices, and service-related correspondence;
- To process payment for services via our third-party payment processor;
- To maintain records of services delivered for accounting, tax, and legal purposes;
- To respond to your enquiries and complaints; and
- To comply with our legal and regulatory obligations under Belgian and EU law.

Clarté will not use your personal information for direct marketing, profiling, or automated decision-making.

5. Sharing Your Personal Information

5.1 Third-Party Payment Processor

Clarté uses a third-party payment processor to handle financial transactions. When you make a payment, your billing information is processed by that processor in accordance with their own privacy policy and applicable law. Clarté does not receive or store your full card or banking details. The payment processor acts as an independent data controller for payment processing purposes.

Clarté will inform you of the identity of the payment processor at the time of invoicing.

5.2 Other Disclosure

Clarté will not sell, rent, or otherwise disclose your personal information to third parties except:

- As required by law, court order, or regulatory authority;
- Where necessary to protect the rights, property, or safety of Clarté, its customers, or others; or
- With your prior written consent.

Clarté does not use third-party marketing platforms, social media trackers, or cloud storage services that process customer personal data. Clarté uses only the built-in analytics feature provided by Wix, its website platform, as described in Section 5.4.

5.3 Website Platform Provider (Wix)

Clarté's website is hosted on the Wix platform (Wix.com, Inc.). When you visit the website or submit the contact form, Wix processes certain technical and session data as the platform provider, acting as a data processor on behalf of Clarté under Wix's own Data Processing Agreement.

Wix may store and process visitor data on servers located outside the European Economic Area ("EEA"). Clarté has no control over Wix's server infrastructure. These transfers are governed by Wix's own data transfer mechanisms in accordance with applicable data protection law. For further details, refer to Wix's Privacy Policy at www.wix.com/about/privacy.

5.4 Website Analytics (Wix)

Clarté uses the built-in analytics feature provided by its website platform, Wix, to monitor aggregated website traffic and visitor behaviour. This includes data such as pages visited, session duration, referral source, and device type. Clarté receives this information only in aggregated and anonymised form and does not use it to identify individual visitors.

This analytics data is used solely to understand how visitors use the website and to improve its content and user experience. It is not used for marketing, profiling, or any purpose beyond internal website improvement. The lawful basis for this processing is Clarté's legitimate interest in operating and improving its website (Article 6(1)(f) GDPR).

Wix processes underlying visitor data (including technical data associated with your visit) as a data processor on Clarté's behalf. Clarté has no control over Wix's server infrastructure or the underlying data Wix collects as part of its platform. For further information, refer to Wix's Privacy Policy at www.wix.com/about/privacy.

6. International Transfers of Personal Data and Applicable Local Law

6.1 Transfers Within the EEA

Clarté is based in Belgium, an EU member state within the EEA. Customer and Authorised Child User personal data is stored and processed in Belgium. Clarté does not transfer personal data to countries outside the EEA as part of its standard operations.

6.2 Customers Outside the EEA

Where a Customer is located outside the EEA, their personal data is transferred to and processed in Belgium for the purpose of delivering the agreed Services. Belgium, as an EU member state, provides a level of data protection that meets or exceeds the standards of most national privacy frameworks.

6.3 Mandatory Local Privacy Laws

Clarté acknowledges that Customers resident in certain countries may benefit from mandatory privacy or data protection rights under the laws of their country of residence that cannot be excluded by contract or by the application of Belgian law.

To the extent that such mandatory local privacy laws apply to the processing of a Customer's or Authorised Child User's personal data and confer rights or protections that are not already provided under the GDPR or this Privacy Policy, Clarté will comply with those requirements.

If you believe that privacy laws in your country of residence apply to your personal data and you wish to exercise any rights under those laws, please contact Clarté at info@clarteeu.com. Clarté will assess your request and respond accordingly.

7. Personal Information of Individuals Under 18

Under Clarté's Terms and Conditions, a Customer must always be at least 18 years of age. Individuals under 18 cannot enter into a contract with Clarté and may only receive Services as an Authorised Child User, that is, as a named beneficiary of a Service purchased by a parent or legal guardian (the Customer).

Where a Customer purchases Services on behalf of an Authorised Child User, the Customer (as parent or legal guardian) is responsible for agreeing to these Terms and Conditions and for providing consent to Clarté to collect and process the Authorised Child User's personal information for the purpose of delivering the agreed Services.

Under the GDPR, processing of a minor's personal data in the context of information society services requires the consent of a holder of parental responsibility where the child is under 16 years of age (Article 8 GDPR). As the Customer is always the contracting adult, Clarté relies on that Customer's consent as the lawful basis for processing any personal data relating to an Authorised Child User.

Clarté does not knowingly collect personal information from individuals under 18 other than as Authorised Child Users with appropriate parental or guardian consent. If Clarté becomes aware that personal data has been collected from a minor without the required consent, it will delete that data promptly.

8. How Long Clarté Retains Your Personal Information

Clarté retains personal information only for as long as necessary for the legitimate purposes for which it was collected, in accordance with the GDPR's storage limitation principle (Article 5(1)(e)).

8.1 Service and Communication Records

Personal information collected in connection with the delivery of services (including Enquiry Form data, session notes, Catalogue, Personalised Pathway Plan documents, and email correspondence) is retained for the duration of the service relationship and for a period of five (5) years following the conclusion of that relationship. This period reflects the applicable limitation period for contractual claims under Belgian law.

8.2 Accounting and Financial Records

Records containing personal information that form part of Clarté's accounting or financial documentation (including invoices and payment records) are retained for a minimum of seven (7) years from the close of the relevant financial year, in accordance with Belgian accounting law (Royal Decree of 21 October 2018).

8.3 Unsuccessful Enquiries

Where a prospective Customer completes an Enquiry Form but does not proceed to purchase a service, their personal information is retained for a period of twelve (12) months from the date of the enquiry, after which it is securely deleted or anonymised.

8.4 Earlier Deletion

You may request earlier deletion of your personal information at any time, subject to Clarté's legal obligations to retain certain records. See Section 9 for how to exercise this right.

Where no specific statutory retention period applies, Clarté determines appropriate retention by reference to the purpose for which the data was collected and the applicable limitation periods under Belgian law.

9. Your Privacy Rights

You have rights in relation to your personal information under the GDPR and the Belgian Privacy Act. These rights are set out below.

Cookie name	Purpose	Duration	Category
__s	Used to store session data for analytics purposes (events.newsroom.bi)	Session	Analytics

Cookie name	Purpose	Duration	Category
mp_*	Stores a unique visitor identifier for analytics purposes	1 year	Analytics
SSR-caching	Indicates how a page was rendered; used for performance optimisation	Session	Preferences
XSRF-TOKEN	Prevents Cross-Site Request Forgery (CSRF) attacks; security cookie	Session	Preferences
hs	Security cookie used by Wix for platform protection	Session	Preferences
bSession	Used for system effectiveness measurement	30 minutes	Preferences
fedops.logger.sessionId	Used for platform stability and effectiveness measurement	12 months	Preferences
ts	Provided by PayPal; supports payment services on the website	3 years	Preferences
svSession	Identifies unique visitors and tracks visitor sessions	2 years	Marketing
_wixAB3l*	Used for site experiments and platform testing	Session	Essential
clientsessionbind	Used for API protection	Session	Essential

To exercise any of these rights, please contact Clarté using the details in Section 1. Clarté will respond to your request within one (1) month of receipt, as required by Article 12 GDPR.

Clarté may need to verify your identity before processing a request. Clarté will not charge a fee for handling reasonable requests unless a request is manifestly unfounded or excessive, in which case it may charge a reasonable administrative fee or decline to act.

9.1 Right to Withdraw Consent

Where Clarté processes your personal data on the basis of consent, you have the right to withdraw that consent at any time without affecting the lawfulness of processing carried out before the withdrawal. To withdraw consent, contact Clarté at info@clarteeu.com.

9.2 Right to Lodge a Complaint

If you believe Clarté has not handled your personal information in accordance with applicable law, you have the right to lodge a complaint with the supervisory authority:

- **Belgian Data Protection Authority (APD/GBA):** Autorité de protection des données / Gegevensbeschermingsautoriteit — www.dataprotectionauthority.be

Where the mandatory privacy laws of your country of residence provide for a right to complain to a local supervisory authority, that right is not affected by the above.

Clarté encourage you to contact it directly in the first instance so that to address your concern promptly.

10. How Clarté Protects Your Personal Information

Clarté takes reasonable technical and organisational measures to protect personal information from unauthorised access, disclosure, alteration, loss, or destruction. These measures include:

- Storing personal data in Belgium, within the EEA, on password-protected devices accessible only to the Clarté Consultant assigned to the relevant Customer;
- Communicating with customers via secure email only;
- Restricting access to personal information to the Clarté Consultant assigned to the relevant Customer;
- Not storing personal information on unsecured devices or shared platforms; and
- Using a PCI-DSS compliant payment processor so that card data is never held by Clarté.

While Clarté takes appropriate precautions, no transmission of information over the internet is completely secure. Clarté cannot guarantee the absolute security of personal information transmitted to or from it by email.

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, Clarté will notify the Belgian Data Protection Authority within 72 hours of becoming aware of the breach, in accordance with Article 33 GDPR. Where the breach is likely to result in a high risk to your rights and freedoms, it will also notify you directly without undue delay.

11. What Are Cookies?

Cookies are small text files placed on your device when you visit a website. They allow the website to recognise your device and remember certain information about your visit, such as your session and security preferences.

Cookies may be “session” cookies (deleted when you close your browser) or “persistent” cookies (which remain on your device for a set period or until you delete them). For further information about cookies generally, visit www.allaboutcookies.org.

12. How Clarté Uses Cookies

Clarté’s website is built on the Wix platform. Wix automatically places a set of essential cookies on your device when you visit the site. These cookies are strictly necessary for the website to function and cannot be switched off. They do not track you for marketing or advertising purposes.

Clarté’s website is built on the Wix platform. Based on a cookie scan conducted on 18 May 2026, the website sets 14 cookies in total: 6 first-party and 8 third-party. These fall into four categories: Essential, Preferences, Analytics, and Marketing. The full details of each cookie are set out in the table below.

The cookies set on Clarté’s website are as follows:

Cookie name	Purpose	Duration	Type
XSRF-TOKEN	Fraud detection and security	Session	Essential
hs	Security cookie (legacy)	Session	Essential
svSession	Security, stability, and core site function	12 months	Essential
SSR-caching	Performance cookie for page rendering	24 hours	Essential
TS*	Attack detection and security	Session	Essential
bSession	System effectiveness measurement	24 hours	Essential
wixSession	Security, stability, and core site function	12 months	Essential
_wixAB3I*	Site experiments (platform testing)	6 months	Essential
fedops.logger.sessionId	Tracking session errors and resilience	12 months	Essential
server-session-bind	API protection	Session	Essential
client-session-bind	API protection	Session	Essential

oAuthState	Session cookie for identification	Session	Essential
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Clarté does not actively configure or control the Analytics, Marketing, or Preferences cookies set by Wix and its integrated services (including PayPal). These cookies are placed by Wix and third-party services as part of the platform's standard operation and Clarté does not use them to identify, track, or market to individual visitors. Wix, as the platform provider, processes the data associated with these cookies on servers that may be located outside the EEA, under its own data processing agreements.

13. How to Manage Cookies

Clarté's website sets both essential and non-essential cookies (including Analytics, Marketing, and Preferences cookies) as described in Section 12. Essential cookies cannot be disabled without affecting the functioning of the website. Non-essential cookies can be controlled or disabled through your browser settings. Please be aware that disabling cookies may affect your ability to use certain features of the website, including the contact form and payment services.

For guidance on managing cookies in your browser, visit the relevant support page:

- Google Chrome: support.google.com/chrome/answer/95647
- Mozilla Firefox: support.mozilla.org/kb/enable-and-disable-cookies-website-preferences
- Safari (macOS): support.apple.com/guide/safari/manage-cookies
- Safari (iOS): support.apple.com/en-us/HT201265
- Microsoft Edge: support.microsoft.com/en-us/help/4027947

14. Privacy Policies of Other Websites

This Privacy Policy applies only to Clarté's services and communications. In the course of delivering Services, Clarté may refer Customers to third-party websites, including the Belgian Data Protection Authority, payment processor portals, or university and government websites. Clarté is not responsible for the privacy practices or content of those websites, and you should review their own privacy policies before providing any personal information.

15. Changes to This Privacy Policy

Clarté may update this Privacy Policy to reflect changes in our practices, legal requirements, or services. Where changes are material, it will notify affected Customers by email at least 30 days before the changes take effect.

The "Last updated" date at the top of this document indicates when it was most recently revised. Continued engagement with Clarté after the effective date of any update constitutes acceptance of the revised Privacy Policy.

16. Contact Clarté

For any questions, concerns, or requests relating to this Privacy Policy or the handling of your personal information, please contact:

Email: info@clarteeu.com

Telephone / WhatsApp: +32 456 077 611

Clarté aims to respond to all privacy-related enquiries within five (5) business days.

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This Privacy Policy is governed by Belgian and EU law. The mandatory privacy laws of each Customer's country of residence apply to the extent they cannot be excluded by contract.