

# Privacy statement

Your privacy is of great importance to us. If you provide us with information we shall handle this accurately. How we do this and for what purposes we use the information is included in this privacy statement.

## Who are we?

This is the privacy statement of RGF Staffing the Netherlands B.V., RGF Staffing Shared Services the Netherlands B.V. and all of our [Dutch group companies](#) that are engaged in services in the area of employment and employment services (hereinafter also referred to as: “we”).

We are the Controller as defined in the General Data Protection Regulation (GDPR). All our business units hold their corporate seat at the P.J. Oudweg 61 in (1314 CK) Almere, telephone number +31 (0)36 529 9555. Easy Way Flex B.V. holds her corporate seat at the Markendaalseweg 63 in (4811 KA) Breda, telephone number +31 (0)76 530 74 00.

We are part of Recruit Holdings Co. Ltd., established in Japan.

## When do we process your information?

We process personal data about you at the moment you address us and leave your data with us.

This is possible through our websites, for instance, when you register for job placement, when you apply for a position with us or with one of our clients or when you participate in one of our online HR (assessment) tools, and also when you visit us at one of our company locations or approach us by email / post or when you offer your services as a (potential) business relation.

For the information that we process about you as you visit one of our website (so-called cookies) we refer you to the cookie statement on the website that you visit.

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## For what purpose do we use your information?

### Job placement with and/or availability to a client

When you provide us with personal data for (the specified purpose of) job placement, then your personal data are included in our central database. This happens if you apply for a specific position with us or a client of ours or if you submit a speculative application or register generally for our mediation services. Inclusion in the central database means that the personal data provided by you for the purpose of finding and/or being placed in a (new) position can be shared with all our group companies that are engaged in this. You can then be approached by these business units with vacancies that may be of interest to you, also in case of an application in respect of a specific vacancy.

Your information may be used for the purpose:

- to enter into and maintain a relationship with you for the purpose of job placement;
- to enhance and stimulate your personal development and employability, for example in the form of education and training;
- to assess your suitability for a position or contract;
- to get you in contact with or to introduce you to one or more (potential) clients and/or relations;
- to make you available to and to have you perform activities for our clients;
- to conclude an agreement for the performance of services, a temporary employment agreement, a secondment agreement, an employment agreement or another type of agreement with you or to enter into and maintain an employment relationship with you;
- to be able to perform the agreement entered into with you;
- to enter into and maintain an employee/employer relationship and to maintain personnel, financial, time recording, absenteeism and/or salary administration for this purpose;
- to comply with our reintegration obligations;
- to grant you access to and let you use our company web environments, (self service) portals;
- to assess if you qualify for a (premium) discount and/or subsidy or if you fall under a (premium) discount or subsidy scheme;
- to comply with the purpose imposed by the government to help people who are distanced from the labour market.

### Handling of applications for positions at the headquarters of RGF Staffing

If you apply for a position/vacancy at the headquarters of RGF Staffing your personal data may be used for the purpose:

- to get in contact with you and to maintain contact with you about your application;
- to assess your suitability for the position or contract that you applied for;
- to grant you access to and let you use our company web environments, (self service) portals.

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## To enter into a business relationship

Your information may be used for the purpose:

- to perform the services requested and/or the contract and/or agreement concluded;
- to enter into a relationship aimed at the acquisition and performance of contracts, to maintain and to keep an (financial) administration for the same.

## We can also use your personal data for the following purposes:

- to perform the services requested – via the website – by you, to let you use our – online – HR tools and to let you participate in (online) tests and to generate test results;
- for legitimate business processes and activities, including management purposes and to generate management information and reports, perform market analyses and data analyses, keeping statistics, (internal and external) controls, financial and processing audits, business transactions (cooperative ventures, sale / purchase) and to enhance and uphold business security;
- ask you about the quality of our services in a satisfaction survey
- to comply with or to examine (suspected) violation of agreed arrangements, internal policy rules / instructions and/or legislation and regulations;
- to comply with legislation and regulations;
- to inform you of our services, other activities and/or professional information (e.g. via job alerts, email, newsletters, business magazines and professional literature) and to present offers to you, unless you indicated that you do not appreciate this. You can direct this kind of request to the Data Protection Officer in the manner indicated below under 'Contact'

## What personal data do we process?

It is necessary that you provide us with the personal data (the personal data may differ per situation and purpose), otherwise we will not be able to conclude an agreement with you and/or will not be able to carry out the requested services.

### In case of job placement (without you actually having worked for us):

- Name and address details (name, address, place of residence) and initials
- Email address, telephone number and potential other contact details
- Title, gender
- Date of birth
- (Desired) position
- Curriculum vitae (CV), work experience, languages, training and educational information (certificates and diplomas)
- Photo (provided that you separately gave explicit consent to this)
- National identification number (Dutch: "BSN") to verify if you are included in the target group register of the Employee Insurance Agency (Dutch: "UWV")
- Target group status / target group statement (Dutch: "doelgroepstatus"/"doelgroepverklaring") (when applicable)
- Screening information, including Certificate of Good Conduct (VOG), attestations, references
- Desired salary

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- Availability (number of hours per week and which days of the week)
- Traveling distance willingness
- Driving licence yes / no
- Type of identity document and document number (when processed during the registration)
- Name and address details, email address and telephone number of parent / carer if you are under the age of 16
- Other information provided by you for the purpose of job placement
- If you were provided with a username and a password to access our company web environments, and/or (self service) portals then these data are also processed by us.

## **In case of applications for positions at the headquarters of RGF Staffing**

- Name and address details (name, address, place of residence)
- Email address, telephone number and potential other contact details
- Date of birth, gender
- Curriculum vitae (CV), work experience, training and educational information
- Photo (provided that you separately gave explicit consent to this)
- Target group status / target group statement (Dutch: “doelgroepstatus”/”doelgroepverklaring”) (when applicable)
- Other information provided by you in the context of the application.

## **If you work or will work via us (placement at a client)**

- Name and address details (name, address, place of residence)
- Nationality, civil status
- Bank account number
- Staff number
- Policy-, or customer number healthcare insurer
- National identification number (Dutch: “BSN”), type of identity document and document number
- Copy of proof of identity, copy of work permit, copy of residence permit (insofar as required by law and/or regulations)
- Target group status / target group statement (Dutch: “doelgroepstatus”/”doelgroepverklaring”) (when applicable)
- Screening information, including Certificate of Good Conduct (VOG), attestations, references
- Assessment details and information regarding career counselling
- Information regarding the position or former positions
- Employment details
- Information with regard to terms and conditions of employment and the relevant implementation
- Information about family members, when required in view of the agreed terms and conditions of employment
- Attendance administration (in connection with, inter alia, leave and absence)
- Reintegration dossiers
- Username and password to gain access to our company web environments, (self service) portals and/or our intranet
- Other information required for the implementation of your employment, contract and/or activities.

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## You are a business relation

- Business contact details
- Information for the maintenance of the business relationship
- If you were given a username and password to gain access to our close web environments and/or (self service) portals then these data are also processed by us

## Lawfulness of the processing of personal data

Personal data is processed on the basis of the following legal grounds:

- the processing is required for the implementation of an agreement that is or was concluded and to which you are a party, e.g. an agreement for the provision of services, a temporary employment agreement for job placement, an employment agreement or a contract;
- the processing is required for us to comply with a statutory obligation, e.g. saving a copy of your proof of identity in our administration in case of the conclusion of an employment agreement;
- the processing is required in connection with one of our justified (business) interests, i.e.:
  - legitimate business processes and activities, including to generate management information and reports, perform market analyses, data analyses, keeping statistics, (internal and external) controls, financial and processing audits, business transactions (cooperative ventures, sale / purchase) and to enhance and uphold business security;
  - compliance with or examination of (suspected) violation of agreed arrangements, internal policy rules / instructions and/or legislation and regulations;
  - to inform you of our services, other activities and/or professional information (e.g. via email, newsletters, business magazines and professional literature) and to be able to present offers to you.
- the personal data are processed with your consent, e.g. applications for positions at the headquarters of RGF Staffing, or your explicit consent, e.g. photos. You can always revoke your consent, from which moment we no longer process the relevant personal data for the purpose for which you gave consent;
- the processing is required in view of the proper implementation of legal regulations and/or claims and/or the reintegration or guidance of employees or benefit recipients.

## Security of your information

We shall pay the utmost attention to take appropriate organisational and technical measures to protect your personal data against unlawful processing and/or loss. Employees of RGF Staffing who have access to your personal data are bound by a confidentiality clause.

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## How is your information shared?

### Within our company

We share your personal data with our group companies for the implementation of one of the purposes described in this privacy statement.

In case of job placement your personal data are included in our central database and the persons within our company engaged in job placement have access to your personal data.

We are part of Recruit Holdings Co. Ltd., established in Japan, hereinafter referred to as: Recruit. Your personal data may, to a limited degree, be shared with Recruit for legitimate business processes and activities, including management analyses, the creation of forecasts, (internal and external) controls, financial and processing audits, business transactions (cooperative ventures, sale / purchase). The European Commission has determined the adequacy decision in respect of Japan. This means that Japan applies an equivalent level of protection for personal data as under the General Data Protection Regulation. For more information, please contact our Data Protection Officer in the manner indicated below under 'Contact'.

### Outside our company

Your personal data are also shared with external parties, persons and organisations outside our group.

We share your personal data with external parties to implement the agreement that we concluded with you. For instance, in case of job placement your personal data are disclosed to potential clients. If you start working with or for us or if you are already working for us then we disclose your personal data to external parties when this is required for the implementation of the agreement (including an employment agreement and/or agreement for the provision of services) that we conclude with you (e.g. training institutions, pension provider, Employee Insurance Agency (UWV)).

We also rely on external companies, contractors and/or suppliers (including so-called "processors") who on our demand perform specific duties or contracts and with whom your personal data may be shared. Some examples:

- external hosting providers are used, including cloud providers for the storage, the management of your data;
- external parties with applications / tools are used, including in the area of recruitment / assessments, job placement, staff management and customer management;
- other specific duties that were outsourced, inter alia absence counselling, IT support and facility management;
- external advisers and consultants are hired.

An external company we work with and who processes personal data to a limited extent is located outside the EU. This concerns:

- Solid Online - based in the Netherlands with a 2nd-line support helpdesk function in

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## India

We only use external companies outside Europe if there is an appropriate level of protection for the processing of personal data. The EU model contracts (standard data protection provisions) adopted by the European Commission are agreed and additional measures and agreements are made where necessary to protect your personal data in the best possible way.

For more information about these external companies and/or to access a copy of the EU model contracts, please contact our Data Protection Officer in the manner indicated below under 'Contact'.

We disclose the personal data that are required for these external parties to perform their activities.

We also disclose your personal data to external parties like the police and official authorities if we are authorised or held to do so in pursuance of the applicable legislation and/or regulations, a judicial order or a judicial ruling or if you gave us consent for it.

## How long do we retain your information?

Your personal data are retained in accordance with the legislation and regulations and as long as required for the purposes for which these data were collected.

In case of *job placement (without you actually having worked for us)* your personal data are retained by us up to 2 years after the last communications with you.

In case of *applications for positions at the headquarters of RGF Staffing* your data are retained by us for a maximum of 4 weeks, unless you gave consent for your data to be retained for a maximum of 1 year.

We apply different retention periods if *you work or have worked through us* (job placement and/or availability to a client)

- Job placement data, application data, screening information and assessment information are retained up to 2 years after the end of your temporary employment / employment agreement.
- Copy of proof of identity, work permits, including associated documents and income tax and national insurance contributions statements, are retained during a period of 5 years after the end of the calendar year of termination of the employment.
- Reintegration dossiers are retained during a period of 2 years after the termination of the temporary employment / employment agreement. In case of self-insurance status pursuant to the Dutch Sickness Benefits Act then a retention period of 5 years after the last handling of the dossier applies. In case of self-insurance status pursuant to the Dutch Return to Work (Partially Disabled Persons) Regulations a retention period of 10 years applies.
- Pension information is retained for 7 years after loss of the actual value.
- Personal data and documents that are important for tax reasons (e.g. temporary employment agreements / employment agreements, training arrangements, payroll

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administration / data, statements about subsidies) are retained for a period of 7 years after loss of the actual value.

For *(potential) business relations* we apply the following retention periods.

- Personal data and documents that are important for tax reasons and/or are part of our civil-law administrative retention obligation (e.g. agreements, order confirmations, 6-component letters, purchase orders) are retained for a period of 7 years after loss of the actual value.
- (Other) contact information is retained up to 2 years after the last communications.

We can, when required (e.g. in case of claims) and/or in view of a (different) statutory obligation, deviate from the aforementioned retention periods.

## Automated decision-making

With job placement and/or availability to a client we partly use automated decision-making. This is the case:

- if you address us to be placed for a specific vacancy at one of our clients; or
- if you generally want to be placed at one of our clients.

We do this to fill vacancies as efficiently as possible. The assessment of suitability takes place objectively.

How does this work? If you want to be placed for a position / a specific vacancy then we receive from you information in order that we can assess your suitability for a certain position. Based on this information it is then, by virtue of objective requirements for a specific position, assessed automatically to what degree you are suitable for the relevant position. Our employees will then examine this outcome and assess if you are actually suitable for the relevant position.

Internal controls take place to guarantee that the automated decision-making takes place correctly and objectively to ensure that everybody is treated equally and is not discriminated against.

If you do not agree with the manner in which we rely on automated decision-making, if you object to this, if you wish to receive a further explanation about this then you can address our Data Protection Officer in the manner indicated below under 'Contact'.

## What are your rights?

You can always request us for access to or information about your personal data or to have these corrected, supplemented or erased.

You can moreover request us to restrict the personal data that we process about you and/or to transfer your personal data (data portability).

If you have your own account in the Privacy Portal, you may also be able to (partially) change, supplement, delete or transfer your personal data yourself. The Privacy Portal can

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be accessed via a link at the bottom of every website of our business units.

## ***Right to object***

You can also address us in case of objections to the manner that we handle your personal data and/or if you do not (longer) want to receive information from us about our services, offers and/or other activities.

You can address your requests and/or objections to our Data Protection Officer in the manner indicated under 'Contact'.

## **In case of questions, comments and complaints**

If you have questions, comments or complaints with regard to this privacy statement or the manner that we register, use or process your personal data then we request you to contact our Data Protection Officer in the manner indicated below under 'Contact'. You are also entitled to submit a complaint to the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*).

## **Contact**

Mrs C. Bos, Data Protection Officer (DPO)  
privacy@rgfstaffing.nl  
RGF Staffing Shared Services the Netherlands B.V.  
P.J. Oudweg 61, 1314 CK Almere

## **Changes to privacy statement**

We may make changes to this privacy statement. The latest privacy statement can always be consulted via our website.

In the event of any dispute to the interpretation of this privacy statement, the Dutch language version shall prevail.

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## Group companies

RGF Staffing the Netherlands B.V.

RGF Staffing the Netherlands Beheer B.V.

RGF Staffing Shared Services the Netherlands B.V.

Start Holding B.V.

Start People Transport & Logistiek B.V.

Start People Services B.V. (also acting under name ASA)

Start People Beheer B.V.

Start People Diensten B.V. (also acting under name ASA)

Start People B.V. (also acting under name ASA, Start People Medi-Interim)

Start People Staffing B.V. (also acting under name ASA)

Start People Uitzenden B.V. (also acting under name ASA)

Unique Nederland B.V. (also acting under name Technicum)

Unique Diensten B.V. (also acting under name Technicum)

Unique Staffing B.V. (also acting under name Technicum)

USG Professionals B.V. (also acting under name USG Finance, USG Legal and USG Marketing & Communication)

USG Engineering Professionals B.V.

USG Payroll Solutions B.V.

Easy Way Flex B.V.

Secretary Plus Management Support B.V. (also acting under name Secretary Plus Direct Team)