We attach great importance to your privacy. When you provide us with information, we handle it with care. How we do this and for what purposes we use your information is set out 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 our <u>Dutch business units</u> that provide services in the field of employment and job placement (hereinafter also referred to as 'us' or 'we').

We are the controller as referred to in the privacy legislation and regulations. All our divisions have their head office at P.J. Oudweg 61 in (1314 CK) Almere, telephone number +31 (0)36 529 9555. Easy Way Flex B.V. has its head office at Spoorstraat 200 in (4811 BH) Breda, telephone number +31 (0)76 530 74 00.

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

## When do we process your information?

We process your personal data when you contact us and provide us with your details.

This can be done, for example, via our websites when you register to be placed in a job, apply for a position with us or one of our clients, sign up for a job alert, participate in one of our online HR(assessment) tools, but also when you visit our office or when you contact us by email/letter or telephone, or when you offer your services as a (potential) business relation.

For information about the data we process when you visit one of our websites, known as cookies, please refer to the cookie statement on the relevant website.



### For what purposes do we use your information?

#### Job placement and/or secondment to a client

When you provide us with personal data for (the stated purpose of) job placement, your personal data will be included in our **central database**. This happens when you apply for a specific position with us or one of our clients, or when you submit an open application or register in general to be placed in a job. Inclusion in the central database means that the personal data you provide for the purpose of finding and/or mediating (new) work may be shared with all our business units involved in this. You may then be approached by these business units with vacancies that may be of interest to you, even if you have applied for a specific vacancy.

Your data may be used to:

- enter into and maintain an employment mediation relationship with you and mediate you to work with our clients;
- promote and stimulate your personal development and employability, for example through education and training;
- assess your suitability for a position or assignment;
- to put you in touch with or introduce you to one or more (potential) clients and/or business relations;
- make you available to and have you perform work for our clients;
- to conclude an assignment agreement, temporary employment/secondment agreement, employment agreement or other type of agreement with you;
- to be able to implement the agreement concluded with you;
- enter into and maintain an employee/employer relationship and to maintain personnel, financial, time, absence and/or payroll records for this purpose;
- to fulfil our reintegration obligations;
- to grant you access to and allow you to use our private web and my environments and (self-service) portals;
- assess whether you are eligible for a (premium) discount and/or subsidy or fall under a (premium) discount or subsidy scheme;
- to comply with the government-imposed objective of helping people who are at a greater distance from the labour market to find work.

Are you 15 years of age or older? Then we have suitable job opportunities for you and you can register with us.



#### Processing applications for positions at RGF Staffing head office

When you apply for a position/vacancy at RGF Staffing's head office, your details will be used to:

- contact you and maintain contact with you regarding your application;
- assess your suitability for the position or assignment you have applied for:
- grant you access to and allow you to use our private web environments and (self-service) portals.

#### Entering into a business relationship

Your data will be used to:

- be able to perform the requested service and/or the agreed assignment and/or agreement;
- to enter into and maintain a relationship aimed at acquiring and executing assignments, and to keep (financial) records for this purpose.

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

- to provide the services you have requested via the website, to allow you to use our online HR tools and to enable you to participate in online tests and generate test results;
- to maintain and improve our services and develop new products and services for the purpose of providing services, including:
  - surveying the quality of our services in a satisfaction survey,
  - evaluating, testing and improving processes, applications and models, for example to optimise the evaluation of candidates or to supplement our pool of temporary workers, and
  - developing analytical models to automate our services, such as matching candidates or automating candidates' competencies and skills;
- for legitimate business processes and activities, including for management purposes and generating management information and reports, performing market analyses, conducting data analyses, maintaining statistics, (internal and external) checks, audits and accountancy checks, business transactions (partnerships, purchase/sale) and promoting and maintaining operational safety;
- compliance with or investigation of (suspected) violations of agreed agreements, internal policy rules/instructions and/or legislation and regulations;
- in order to comply with applicable laws and regulations;
- to inform you about our services, other activities and/or professional information (e.g. e-mail, newsletters, company magazines and professional literature) and



to be able to make you offers, unless you indicate that you do not wish to receive them. You can address such a request to our Data Protection Officer in the manner specified under 'Contact' below.

### What personal data do we process?

It is necessary that you provide us with personal data (which may vary depending on the situation and purpose), because otherwise we will not be able to enter into a contract with you and/or provide the services you have requested.

#### For job placement (without having worked for us)

- Name, address, place of residence and initials
- Email address, telephone number and any other contact details
- Title, gender
- Date of birth
- (Desired) position
- Curriculum vitae (CV), work experience, work location, languages, education and training details (certificates and diplomas)
- Photo\* (if you have given separate and explicit permission for this)
- BSN to verify whether you are included in the UWV target group register
- Target group status/target group statement (if applicable)
- Screening information, including Certificate of Good Conduct, certificates, references
- Desired salary
- Availability (number of hours per week and which days of the week)
- Willingness to travel
- Driving licence yes/no
- Type of ID and document number (if processed during registration)
- Video and audio transcription of an intake interview (if you have given separate and explicit permission for this)
- Name and address details, email address and telephone number of parent/guardian if you are under 16 years of age
- Other information provided by you in the context of job placement
- If you have been provided with a username and password to access our private web and my environments and/or (self-service) portals, we will also process this information.
- An Avatar, if you have created one in the mining environment

<sup>\*</sup> If you are under 16, we ask that you do not include a photo on your CV. If you do so, we will assume that you have permission from your parents or guardians.



#### When processing applications for positions at RGF Staffing headquarters

- Name and address details (name, address, place of residence)
- Email address, telephone number and any other contact details
- Date of birth, gender
- Curriculum vitae (CV), place of work, work experience, education and training details
- Photograph (if you have given separate and explicit consent for this)
- Target group status/target group statement (if applicable)
- Other information provided by you in the context of the application

#### When you work or are going to work through us (assignment to a client)

- The information mentioned above under 'employment services'
- Nationality
- Bank account number
- Personnel number
- Health insurance policy or customer number
- BSN, type of ID and document number
- Copy of ID, copy of work permit, copy of residence permit (if required by law and/or regulations)
- Target group information/target group statement (if applicable)
- Screening information, including Certificate of Good Conduct, certificates, references
- Assessment data and data relating to career guidance
- Data relating to the position or former positions
- Employment details
- Data relating to terms and conditions of employment and their implementation
- Data relating to family members where necessary in view of the agreed terms and conditions of employment
- Attendance records (in connection with, among other things, leave and absenteeism)
- Reintegration files
- Username and password to access our private web and mine environments, (self-service) portals and/or our intranet
- An avatar, if you have created one in the My Environment
- Other information required for the performance of your employment, assignment, agreement and/or work.

#### You are a business relation

- Business contact details
- Information for maintaining the relationship
- When a username and password are provided to access



our private web environments and/or (self-service) portals, this data will also be processed by us.

## Basis for processing personal data

We process personal data on the following legal grounds:

- The processing is necessary for the performance of a contract to which you are a party. This includes the conclusion of a service agreement, agreement for employment mediation, employment contract or assignment contract as explained under the objectives "Employment mediation and/or secondment to a client", "Processing applications for positions at RGF Staffing head office" and "Entering into a business relationship". This also includes the processing of your personal data in the context of a job application (whether or not submitted via our website).
- The processing is necessary to comply with a legal obligation, for example, keeping a copy of your ID in our records when entering into a temporary employment/secondment agreement.
- The processing is necessary in connection with a legitimate (business) interest that we have, namely:
  - maintaining and improving our services, as well as developing new products and services;
  - legitimate business processes and activities, including generating management information and reports, performing market analyses, data analyses, maintaining statistics, (internal and external) checks, audits and accountancy checks; business transactions (partnerships, purchase/sale) and promoting and maintaining occupational safety;
  - compliance with or investigation of (suspected) violations of agreed agreements, internal policies/instructions and/or laws and regulations;
  - defending our legal interests in all forms of dispute resolution;
  - to provide you with further information about our services, other activities and/or professional information (e.g. via e-mail, newsletters, company magazines and professional literature) after you have purchased our services, and to be able to make you offers.
- Personal data is processed with your consent, for example, when you decide to include a photo with your application letter, or when you give your consent for a video recording and/or audio transcription to be made during an interview (for the purpose of improving our services, developing new products, and/or making you available to a client). You can withdraw your consent at any time, which means that from that moment on, we will no longer process the personal data in question for the purpose for which consent was requested.



### Security of your information

We make every effort to take appropriate organisational and technical measures to protect your personal data against unlawful processing and/or loss. RGF Staffing employees who have access to your personal data are bound by a confidentiality clause.

## How do we share your information?

#### Within our company

We share your personal data within our company with other business units for the purposes described in this privacy statement.

In the case of job placement, your personal data will be included in our central database and the employees of our company who are involved in job placement will have access to your personal data.

We are part of Recruit Holdings Co. Ltd, based in Japan, hereinafter referred to as Recruit. Your personal data may, to a limited extent, be shared with Recruit for legitimate business processes and activities, including management analyses, issuing forecasts, (internal and external) checks, audits and accountancy checks, business transactions (partnerships, purchase/sale).

Some of Recruit's subsidiaries support us in the development of analytical models aimed at improving our services and developing new products and services in the field of employment services. Your personal data may be shared for these purposes.

The European Commission has adopted the adequacy decision with regard to Japan. This means that Japan applies an equivalent level of protection for personal data as under the General Data Protection Regulation.

For America , there equivalent an adequacy decision has been adopted. The subsidiaries in America fall under the EU-U.S. Data Privacy Framework.

For more information about this, please contact our Data Protection Officer; see the details under 'Contact'.

#### **Outside our company**

Your personal data will also be shared with external parties, individuals and organisations outside our company.

We share your personal data with external parties in order to perform the agreement we have entered into with you



. For example, in the case of job placement, your personal data will be provided to potential clients. If you are going to work for us or already work for us, we will provide your personal data to external parties where this is necessary for the performance of the agreement (including employment contract and/or contract for services) that we have entered into with you (e.g. training institutions, pension administrator, UWV).

We also use external companies, subcontractors and/or suppliers (including so-called processors) who perform specific tasks or assignments at our request and with whom your personal data may be shared. Some examples:

- external hosting providers are used, including cloud providers for the storage and management of your data;
- External parties are used for applications/tools in areas such as recruitment/assessments, job placement, personnel management and customer management.
- Other specific tasks that are outsourced include absenteeism support, IT support and facility management.
- external advisors and consultants are engaged.

An external company with which we work and which processes personal data outside Europe to a limited extent:

 Solid Online - based in the Netherlands with a second-line support helpdesk function in India.

We only use external companies outside Europe if there is an adequate level of protection for the processing of personal data. The EU model contracts (standard data protection clauses) established by the European Commission are agreed upon and, where necessary, additional measures are taken and agreements are made to protect your personal data as well as possible.

For more information about these parties and/or to consult a copy of the EU model contracts, please contact our Data Protection Officer; see the details under 'Contact'.

We provide the personal data necessary for these external parties to perform their work.

We also provide your personal data to external parties, such as the police and government institutions, if we are entitled or obliged to do so on the basis of applicable laws and/or regulations, by means of a court order or a court ruling, or if you have given your consent.



## How long do we retain your data?

Your personal data will be retained in accordance with laws and regulations and for as long as necessary for the purposes for which this data was collected.

In the case of *job placement (without you having worked for us)*, we will retain your personal data for up to 2 years after our last contact with you.

When applying for vacancies at RGF Staffing's head office, your data will be retained for a maximum of 4 weeks after the end of the procedure, unless you have given your consent to retain your data for a maximum of 1 year.

If you work or have worked through us (assignment to a client), we apply different retention periods.

- We retain employment agency data, application data, screening information and assessment data for up to 2 years after the end of your temporary employment /employment contract.
- We retain copies of ID documents, work permits, including related documents, and payroll tax statements for 5 years after the end of the calendar year in which you left our employment.
- We retain reintegration files for two years after the end of the temporary employment /employment contract. If there is self-insurance for the Sickness Benefits Act (ZW), a retention period of 5 years after the last action on the file applies. If there is self-insurance for the WGA, a retention period of 10 years applies.
- We retain pension information for seven years after it loses its current value.
- We retain personal data and documents that are relevant for tax purposes (such as temporary employment contracts/employment contracts, training agreements, payroll administration/data, statements regarding subsidies) for seven years after they lose their current value.

For certain applications of data aimed at *maintaining and improving our services, or developing new products and services*, such as creating analytical models, a longer time frame may be necessary, as some insights only become clear over time. In these cases, the standard retention period may be extended to five years. We will endeavour to break the link with individuals as soon as possible, so that we only work with aggregated or pseudonymised data.

If you are a (potential) business relation, the following periods will apply.

- We retain personal data and documents that are relevant for tax purposes and/or form part of the civil administrative retention obligation that we have as a company (such as agreements, order confirmations, 6 component letters, purchase orders) for 7 years after they have lost their current value.
- We retain (other) contact information for up to 2 years after the last contact.



We may deviate from the terms mentioned here where necessary (e.g. in the case of claims) and/or in view of a (different) legal obligation.

## **Automated decision-making**

We use partially automated decision-making in job placement. This applies

- if you contact us to be placed in a specific vacancy with one of our clients; or
- if you wish to be placed in a job with one of our clients in general.

We do this in order to fill vacancies as efficiently as possible. Suitability is assessed objectively.

How does this work? If you want to be referred to a job/specific vacancy, we will receive information from you so that we can assess whether you are suitable for a particular position. Based on this information, an automated assessment is made of your suitability for the position in question, using the objective requirements for that specific position. Our staff will then review these results and assess whether you are actually suitable for the position in question.

Internal checks are carried out to ensure that the automated decision-making process is correct and objective, so that we can be sure that everyone is treated equally and that there is no discrimination.

If you disagree with the way we use automated decision-making, if you object to it or would like further explanation, please contact our Data Protection Officer. See the details under 'Contact'.

## What are your rights?

You can ask us at any time to access your personal data or to change, supplement or delete it.

In addition, you can ask us to restrict the personal data we process about you and/or to transfer your personal data (data portability).

Job placement candidates and flex workers can log in to the Privacy Portal via twostep verification. Through this self-service portal, you can view, (partially) change, supplement, delete or transfer your personal data. The Privacy Portal can be accessed via a link at the bottom of every website of our business units. In the Candidate Portal, you will find a comprehensive overview of the stored data and documents. You can access the Candidate Portal by logging into the 'My' environment.



### Right to object

If you have any objections to the way in which we handle your personal data and/or if you no longer wish to receive information from us about our services, offers and/or other activities, you can contact us or save your preferences in the Privacy portal.

You can address your requests and/or objections to our Data Protection Officer; see the details under 'Contact'.

### Questions, comments and complaints

If you have any questions, comments or complaints regarding this privacy statement or the way in which we register, use or process your personal data, please contact our Data Protection Officer. See the details under 'Contact'. You also have the right to lodge a complaint with the Data Protection Authority.

#### Contact

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

### Changes to the privacy statement

We may amend this privacy statement. The most current privacy statement can always be consulted on our websites.



### **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 & Logistics Limited

Start People Services Limited (also trading as

ASA) Start People Management Limited

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

Start People Limited (also trading as ASA, Start People Medi-

Interim) Start People Staffing Limited (also trading as ASA)

Start People Uitzenden B.V. (also trading under the

name ASA) Unique Nederland B.V. (also trading

under the name Technicum) Unique Diensten B.V.

(also trading under the name Technicum) Unique

Staffing B.V. (also trading under the name

Technicum)

USG Professionals B.V. (also trading under the names USG Finance, USG Legal,

USG HR and USG Marketing & Communication)

**USG Engineering Professionals** 

Limited USG Payroll Solutions Limited

Easy Way Flex Limited

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

