Privacy statement

We take your privacy very seriously. When you provide us with information, we handle it with care. This privacy statement explains how we do this and the purposes for which we use your information.

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 Dutch business units involved in employment and recruitment services (hereinafter also referred to as “us” or “we”).

We are the data controller as defined in the legislation and regulations governing privacy. All our business units have their head office at P.J. Oudweg 61, (1314 CK) Almere, telephone number +31 (0)36 529 9555. Easy Way Flex B.V. has its head office at Spoorstraat 200, Breda (4811 BH), 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 may be, for example, via our websites when you register to be placed in a job, apply for a role with us or with one of our clients, sign up for a job alert, take part in one of our online HR(assessment) tools, but also when you visit our office, contact us by email, letter or telephone, or offer your services to us as a (potential) business partner.

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?

Employment placement and/or secondment to a client

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

Your data may be used to:

- establish and maintain an employment placement relationship with you and place you in work with our clients;
- promote and encourage your personal development and employability, for example through education and training;
- assess your suitability for a role or assignment;
- put you in contact with or introduce you to one or more (potential) clients and/or business contacts;
- to make you available to our clients and have you carry out work for them;
- to enter into a contract for services, a temporary employment or secondment contract, an employment contract or any other type of contract with you;
- to be able to fulfil the agreement concluded with you;
- to establish and maintain an employer-employee relationship and to keep personnel, financial, time, absence and/or payroll records for this purpose;
- to fulfil our reintegration obligations;
- to grant you access to and enable you to use our private web and ‘My’ environments and (self-service) portals;
- to assess whether you are eligible for a (contribution) discount and/or subsidy or fall under a (contribution) discount or subsidy scheme;
- to meet the government-imposed objective of helping people who are further removed from the labour market to find work.

Are you aged 15 or over? If so, we have suitable job opportunities for you and you can register with us.

Privacy statement

Processing of applications for roles at RGF Staffing's head office

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

- to contact you and keep in touch regarding your application;
- to assess your suitability for the role or assignment for which you have applied;

Establishing a business relationship

Your data will be used to:

- enable us to provide the requested services and/or carry out the agreed assignment and/or contract;
- to establish and maintain a relationship aimed at acquiring and carrying out 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 enable you to use our online HR tools, and to allow you to take part in (online) tests and generate test results;
- to maintain and improve our services, and to develop new products and services for the purpose of providing our services, including:
    - assessing the quality of our services through a satisfaction survey;
    - evaluating, testing and improving processes, applications and models, for example to optimise the assessment of candidates or the replenishment of our pool of temporary staff, and
    - developing analytical models to automate our services, such as matching candidates' competencies and skills.
- for legitimate business processes and activities, including for management purposes and the generation of management information and reports, conducting market analyses, carrying out data analyses, maintaining statistics, (internal and external) controls, audits and statutory audits, business transactions (partnerships, purchases/sales) and to promote and maintain business security;
- compliance with, or investigation into, (suspected) breaches of agreed arrangements, internal policies/instructions and/or legislation and regulations;
- to comply with applicable laws and regulations;
- to inform you about our services, other activities and/or professional information (for example, emails, newsletters, company magazines and professional literature) and to be able to make offers to you, unless you indicate that you do not wish to receive them. You may 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 for you to provide us with personal data (which may vary depending on the situation and purpose), as otherwise we will be unable to enter into a contract with you and/or provide the services you have requested.

In the case of job placement (where you have not previously worked for us)

- Name and address details (name, address, place of residence) and initials
- Email address, telephone number and any other contact details
- Title, gender
- Date of birth
- Candidate number
- (Desired) role
- Curriculum vitae (CV), work experience, place of work, languages, education and training details (certificates and diplomas)
- Photograph* (if you have given separate and explicit consent for this)
- BSN to check whether you are listed in the UWV target group register
- Target group status/target group declaration (if applicable)
- Screening information, including a Certificate of Good Conduct (VOG), certificates and 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 provided during registration)
- Video and audio transcript of an intake interview (if you have given separate and explicit consent for this)
- Name, address and contact details, email address and telephone number of a parent or carer if you are under 16
- Other data provided by you in the context of job placement
- A username and password to access our private web and candidate portals and/or (self-service) portals (if provided to you)
- An avatar, if you have created one in the ‘My Account’ section

* 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 your parents’ or carers’ consent.

When processing applications for roles at RGF Staffing’s head office

- Personal details (name, address, town/city)
- 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 declaration (if applicable)
- Any other information you have provided in connection with your application

If you are working or will be working through us (placement with a client)

- The data mentioned above under ‘employment placement’
- Nationality
- Bank account number
- Staff number
- Health insurer’s policy or customer number
- BSN, type of ID and document number
- copy of ID, copy of work permit, copy of residence permit (where required by law and/or regulations), biometric code and photograph if you are verifying your identity remotely
- Target group information/target group declaration (if applicable)
- Screening information, including Certificate of Good Conduct (VOG), certificates and references
- Assessment data and data relating to career guidance
- Data relating to the current or previous roles
- Employment details
- Data relating to terms and conditions of employment and their implementation
- Data relating to family members where necessary for the purposes of the agreed terms and conditions of employment
- Attendance records (relating to, amongst other things, leave and absence)
- Reintegration files
- Other information required for the performance of your employment, assignment, contract and/or work.

You are a business contact

- Business contact details
- Details for maintaining the business relationship
- A username and password to access our secure web environments and/or (self-service) customer portal (if provided to you).

Legal basis for the processing of 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 entering into a service agreement, an employment agency agreement, an employment contract or a contract for services, as explained under the purposes *'Employment agency services and/or secondment to a* client', *'Processing of applications for positions at RGF Staffing's head* office' and *'Establishing a business relationship*'. This also includes the processing of your personal data in connection with a job application (whether or not submitted via our website).
- The processing is necessary to comply with a **legal obligation**, for example, retaining a copy of your ID in our records when entering into a temporary employment or secondment agreement.
- The processing is necessary in connection with a **legitimate (business) interest** we have, namely:
  - maintaining and improving our services, as well as developing new products and services;
  - legitimate business processes and activities, including the generation of management information and reports, the carrying out of market analyses and data analyses, the maintenance of statistics, (internal and external) checks, audits and statutory audits, business transactions (partnerships, purchases/sales), taking out insurance, and promoting and maintaining business security;
  - compliance with, or investigation into, (suspected) breaches of agreed terms, internal policies/instructions and/or legislation 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 (for example, via email, newsletters, company magazines and professional literature) after you have used our services, and to be able to make offers to you.
- Personal data is processed with your **consent**, for example, when you decide to include a photograph on your CV, or when you give your consent for a video recording and/or audio transcription to be made during an interview (to improve our services, develop new products, and/or place you with a client). You may withdraw your consent at any time, which means that from that moment onwards, 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 implement appropriate organisational and technical measures to protect your personal data against unauthorised processing and/or loss. RGF Staffing and its brands are ISO 27001 certified.
Employees of RGF Staffing who have access to your personal data are bound by a confidentiality clause.

How do we share your information?

Within our organisation

We share your personal data within our company with the relevant business units for the purposes set out in this privacy statement.

In the context of recruitment, your personal data is stored in our central database, and employees of our company involved in recruitment 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, forecasting, (internal and external) controls, audits and statutory audits, and business transactions (partnerships, acquisitions/disposals).

Indeed, a subsidiary of Recruit, supports us in developing analytical and AI models aimed at improving our services and developing new products and services in the field of recruitment; your personal data may be shared for these purposes. This also occurs, for example, when you apply for our vacancies via the Indeed platform.

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

An adequacy decision has also been adopted for the United States. Indeed falls under the EU-US Data Privacy Framework.

For further information on this, please contact our Data Protection Officer; see the contact details under ‘Contact’.

Outside our organisation

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

We share your personal data with external parties in order to fulfil the agreement we have entered into with you. For example, in the context of recruitment, your personal data is provided to potential clients. If you are going to work for us or are already working for us, we will provide your personal data to external parties where this is necessary for the performance of the agreement (including an employment contract and/or contract for services) that we have entered into with you (for example, training providers, pension administrators, the UWV and the tax authorities).

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

- we use external hosting providers, including cloud providers, for the storage and management of your data;
- we use external parties with applications/tools, including those relating to recruitment/assessments, job placement, HR management and customer management;
- other specific tasks that have been outsourced include, amongst others, absence management, IT support and facility management;
- external advisers 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) adopted by the European Commission are agreed upon, and where necessary, additional measures are taken and arrangements made to protect your personal data as effectively as possible.
For further information about these parties and/or to view a copy of the EU standard contractual clauses, please contact our Data Protection Officer; see the contact details under 'Contact'.

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

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

How long do we retain your data?

Your personal data is retained in accordance with legislation and regulations and for as long as necessary for the purposes for which it was collected.

In the case of *job placement (where you have not worked for us),* we will retain your personal data for up to 2 years after our last contact with you.

For *applications for vacancies at RGF Staffing's head office*, your data will be retained for up to 4 weeks after the end of the recruitment process, unless you have given your consent for your data to be retained for up to 1 year.

If you are working or have worked through us (on secondment 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 or employment contract.

- We retain copies of ID documents, work permits (including related documents) and payroll tax certificates for 5 years after the end of the calendar year in which your employment ended. The biometric code and photograph used for remote identification are deleted immediately after verification.
- We retain reintegration files for 2 years after the end of the temporary employment or employment contract. Where the employer bears the risk under the Sickness Benefits Act (ZW), a retention period of 5 years applies from the date of the last action taken on the file. Where the employer bears the risk under the Return to Work Scheme (WGA), a retention period of 10 years applies.
- We retain pension information for 7 years after the loss of its current value.
- We retain personal data and documents of tax relevance (such as temporary employment contracts/employment contracts, training agreements, payroll records/data, and statements regarding subsidies) for 7 years after the loss of current value.

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

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

We may deviate from the periods mentioned here where necessary (for example, in the event of claims) and/or in view of a (different) legal obligation.

Automated decision-making

In the context of job placement, we use partially automated decision-making.
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 role with one of our clients in general.

We do this to fill vacancies as efficiently as possible. The assessment of suitability is carried out objectively.

How does this work? If you wish to be placed in a job or a specific vacancy, we will receive information from you so that we can assess whether you are suitable for a particular role. Based on this information, and using AI, we assess the extent to which you are suitable for the role in question, taking into account the objective requirements for that specific role. Our staff then review the results and assess whether you are actually a good fit for the role in question.

You will also be invited to apply for vacancies based on matches identified using AI.

Internal checks are carried out on an ongoing basis to ensure that the automated and AI-driven processes are conducted correctly and objectively, so that we can be certain that everyone is treated equally and that there is no discrimination.

If you do not agree with the way in which we use automated decision-making, if you object to this or would like further explanation, please contact our Data Protection Officer; see the contact details under ‘Contact’.

What are your rights?

You may ask us at any time to access your personal data or to amend, supplement or delete it.
You may also ask us to restrict the processing of your personal data and/or to transfer your personal data (data portability).

Job seekers and temporary staff are given the option to activate the ‘My’ portal after registering. This is a self-service Candidate Portal. Via this self-service portal, you can view, amend (in part), supplement, have deleted or have transferred your personal data and documents. You can log in to the Candidate Portal via the website of the brand you work for – the login button is located at the top right of the screen at .

Right to object

If you have an objection 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 Candidate Portal (the ‘My Account’ section).

You can address your request and/or objection to our Data Protection Officer; please see the contact details under ‘Contact’.
We will contact you as soon as possible, and at the latest within one month.

For questions, comments and complaints

If you have a question, comment or complaint regarding this privacy statement or the way in which we process your personal data, please contact our Data Protection Officer; see the contact details under ‘Contact’.
You also have the right to lodge a complaint with the Dutch Data Protection Authority.

Contact

Ms C. Bos, Data Protection Officer (DPO)

Privacy statement

privacy@rgfstaffing.nl
RGF Staffing Shared Services the Netherlands B.V.
P.J. Oudweg 61, 1314 CK Almere

Changes to the privacy statement

We may amend this privacy statement. The most up-to-date privacy statement is always available on our websites.

Privacy statement

Group companies
RGF Staffing the Netherlands B.V.
RGF Staffing the Netherlands Beheer B.V.
RGF Staffing Shared Services the Netherlands B.V.
Start People Services B.V. (also trading as ASA)
Start People Beheer B.V.
Start People Services B.V. (also trading as ASA)
Start People B.V. (also trading as ASA, Start People Medi-Interim)
Start People Staffing B.V. (also trading as ASA)
Start People Uitzenden B.V. (also trading as ASA)
Unique Nederland B.V. (also trading as Technicum)
Unique Diensten B.V. (also trading as Technicum)
Unique Staffing B.V. (also trading as Technicum)
USG Professionals B.V. (also trading as USG Finance, USG Legal, USG HR, USG Marketing & Communication and USG Management & Consultancy)
USG Engineering Professionals B.V.
USG Payroll Solutions B.V.
Easy Way Flex B.V.
Secretary Plus Management Support B.V. (also trading as Secretary Plus Direct Team)