

PRIVACY STATEMENT

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

Who are we?

This is the privacy statement of USG People Holdings B.V., USG People The Netherlands B.V. and all of our Dutch group companies that are engaged in services in the area of employment and employment services.

It regards, inter alia, the operating companies pertaining to the labels Start People, Unique, Business Services, USG Engineering, USG Professionals, Technicum, Receptel, Secretary Plus, KLV Professional Match, Topchauffeur and CapitalP.

We are the controller as defined in the General Data Protection Regulation (GDPR) regarding the processing of your personal data. All our business units hold their corporate seat at the P.J. Oudweg 61 in (1314 CK) Almere.

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 in any way whatsoever and leave your data with us.

This is possible through our websites, for instance, when you register for job placement employment services, 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 the branch 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 a user of one of our website (so-called cookies) we refer you to the [cookie statement](#) on the website that you visit.

For what purposes 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, for instance when you apply for a specific position with us or one of our clients and/or when you send us an open application or register with us for the purpose of being placed by us at a client, then your personal data are included in our [central database](#). 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 a specific or open application in respect of a specific vacancy.

- To enter into and maintain a relationship with you for the purpose of job placement and/or make you available to place for a position with our clients.
- To enhance and stimulate your personal development and employability, including 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 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 and to keep a personnel, financial, absence and/or payroll administration for this.

- To comply with our reintegration obligations.
- To grant you access to and let you use our company web environments, (self-service) portals and our intranet.
- 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 specific categories of people who have a disadvantage in employability find employment.

Handling of applications permanent / indirect employees

This regards personal data provided for applications for positions / vacancies at our own company and not for (the indicated purpose of) job placement and/or availability at a client.

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

To enter into a business relationship

- To perform the services requested by you and/or the contract and/or agreement concluded with you.
- 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.
- To comply with or to examine (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 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, Mrs Y. van Houte, in the manner indicated below under ‘Contact’.

What personal data do we process?

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)
- Target group status / target group statement (Dutch: “doelgroepstatus”/”doelgroepverklaring”) (when applicable)
- Screening information, including Certificate of Good Conduct (VOG), attestations, references
- Desired salary
- Availability (number of hours per week and what 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 of candidates under the age of 16
- Other information provided by you for the purpose of job placement and employment services
- If you were provided with a username and a password to access our company web environments, (self-service) portals and/or our intranet then these data are also processed by us.

In case of applications permanent / indirect employees

This regards applications for positions / vacancies at our own company, and not for the (intended purpose of) job placement and/or availability at a third party.

- 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 gave separate explicit consent to this)
- Target group status / target group statement (Dutch: “doelgroepstatus”/”doelgroepverklaring”) (when applicable)
- Other information provided by you in relation to the application

You work or start working through us (job placement and/or availability to a client)

- The data mentioned above under 'job placement'
- Nationality, place of birth, civil status
- Bank account number
- Staff number
- Policy-, or customer number healthcare insurer
- national identification number (Dutch: “BSN”), copy of proof of identity, copy of work permit, copy of residence permit and copy of Declaration of Independent Contractor Status (VAR) and/or replacement of VAR
- 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

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

We process your personal data on the basis of the following legitimate 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 data processing is required for us to comply with a statutory obligation, e.g. the inspection of

- your proof of identity in case of a job placement or the conclusion of an employment agreement;
- the data 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 of permanent / indirect employees, or your explicit consent, e.g. photos. You can always revoke your consent, which implies that effective from that moment we no longer process the relevant personal data for the purpose for which consent was requested;
 - the data processing is required in view of the implementation of obligations that are vested in us as an employer in the area of employment law and social security law in case of absence and reintegration.

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 USG People who have access to your personal data are bound by a confidentiality clause.

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 earlier on in this privacy statement. In case of job placement your personal data are included in our central database and the persons within our company (including our group companies) 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). Appropriate measures are taken to ensure that the personal data that are transferred are protected properly. The EU model agreements (standard provisions regarding data protection) established by the European Commission are agreed upon. 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 companies 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.

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 is your information retained?

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 agreement with you.

In case of applications of permanent / indirect employees (at our own company, and not for the (intended purpose of) job placement and /or availability to a client, 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.

You work or you start working through us (job placement and/or availability to a client) we then apply different retention periods to your personal data.

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

Are you a (potential) business relation 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.

Profiling

Within the framework of job placement and/or availability to a client we use an online test on our websites in which you can participate. Participation in this online test is voluntary. It is an additional tool that enables us to place you more specifically. The test consists of several questions that are about you. Based on your answers a profile is created about you that describes what work environment and work situation would suit you. This information is then used by us, with your consent, within the framework of your job placement.

Controls are conducted in respect of the manner that the profiles are created in order to ensure that the profiles do not include parameters that may lead to unequal handling and/or discrimination of individuals and/or groups of people.

Automated decision-making

With job placement employment services 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 prior to the conclusion of a potential job placement agreement in the most efficient way possible, in the course of which the assessment of the suitability takes place objectively.

If you want to be placed for a position / a specific vacancy then you must provide us with information in order that we can place you and/or can assess your suitability for a certain position. We register this information in our systems. 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 in the manner described here and to ensure that everybody is treated equally and is not discriminated against.

If you do not agree with the manner that we rely on automated decision-making, if you object to this, if you wish to receive a further explanation about this or if you (otherwise) want to make a comment then you can address our Data Protection Officer, Mrs Y. van Houte, 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. If you have access to a company web environment or a portal it could be possible for you to personally (partly) correct, supplement or erase your personal data.

You can moreover request us to limit the personal data that we process about you and/or to transfer your personal data (data portability). Please see [USG Privacy Portaal](#) for more information.

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 want to receive information from us about our services, offers and/or other activities (e.g. via email, newsletters, business magazines and professional literature).

You can address your requests and/or objections to our Data Protection Officer, Mrs Y. van Houte, 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, Mrs Y. van Houte, in the manner indicated below under 'Contact'. You are also entitled to submit a complaint to the Dutch Data Protection Authority.

Contact

Mrs Y. van Houte, Data Protection Officer (DPO)

privacy@usgpeople.nl

USG People The Netherlands B.V.
P.J. Oudweg 61
1314 CK Almere

Adjustments privacy statement

We may adjust this privacy statement. The latest privacy statement can always be consulted via our websites.