

Privacy statement

We attach great importance to your privacy. When you provide us with information, we treat it with care. How we do this and the purposes for which we use your information are 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 [Dutch business units](#) engaged in employment and job placement services (hereinafter also referred to as "us" or "we").

We are a data controller as referred to in the privacy laws and regulations. All our divisions have their headquarters at P.J. Oudweg 61 in (1314 CK) Almere, telephone number +31 (0)36 529 9555. Easy Way Flex B.V. has the head office at Spoorstraat 200 in (4811 BH) Breda, telephone +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 the moment you contact us and leave your details with us.

This may be through our websites, for example, when you register to be mediated for work, apply for a position with us or with one of our clients, sign up for a job alert, participate in one of our online HR (assessment) tools, but also when you visit us at our offices or when you approach us by email/letter or telephone or offer your services as a (potential) business relation.

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

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For what purposes do we use your information?

Employment placement and/or posting with a client

If you provide personal data to us for (the stated purpose of) employment mediation, your personal data will be included in our **central database**. This happens when you specifically apply for a position with us or a client of ours or when you make an open application or a general application to be mediated into work. Inclusion in the central database means that the personal data you provide for the purpose of finding and/or mediating (new) work can be shared with all our business units dealing with 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:

- Establish and maintain an employment relationship with you and mediate you to work with our clients;
- promote and encourage your personal development and employability, for example through education and training;
- assess your suitability for a job or assignment;
- putting you in touch with or introducing you to one or more (potential) clients and/or relations;
- making you available to and performing work for our clients;
- enter into a contract of assignment, agency/detachment agreement, employment contract or other type of agreement with you;
- to be able to execute the agreement concluded with you;
- enter into and maintain an employee/employer relationship and keep personnel, financial, time, absence and/or payroll records for this purpose;
- fulfil our reintegration obligations;
- allowing you to access and use our private web and mine environments and (self-service) portals;
- Assess whether you are eligible for a (premium) discount and/or subsidy or are covered by a (premium) discount or subsidy scheme;
- meet the government-mandated goal of employing people with a large(er) distance to the labour market.

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Handling job applications head office RGF Staffing

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

- getting in touch with you and keeping in touch about your application;
- assess your suitability for the position or assignment you have applied for;
- allowing you to access and use our private web environments, (self-service) portals.

Entering into a business relationship

Your data will be used to:

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

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

- to carry out the services requested by you - via the website - to let you use our - online - HR tools and to let you participate in (online) tests and generate test results;
- maintenance and improvement of our services, and the development of new products and services for the benefit of the service, including:
 - querying the quality of our services in a satisfaction survey,
 - evaluate, test and improve processes, applications and models, for example to optimise the evaluation of candidates or the replenishment of our pool of temporary workers; and
 - develop analytical models to automate our services, such as matching candidates or automating candidate competences and abilities;
- for legitimate business processes and activities, including for management purposes and generating management information and reports, performing market analyses, doing data analysis, maintaining statistics, (internal and external) controls, audits and auditing, business transactions (joint ventures, buying/selling) and promoting and maintaining corporate security;
- compliance with or investigation of (suspected) violation of agreed arrangements, internal policies/instructions and/or laws and regulations;
- to comply with applicable laws and regulations;
- to inform you about our services, other activities and/or professional information (for example, e-mail, newsletters, company magazines and professional literature) and

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to provide you with offers, unless you indicate that you do not wish to do so. 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), because otherwise we will not be able to enter into a contract with you and/or perform the service you have requested.

On job placement (without having worked for us)

- NAW data (name, address, place of residence) and initials
- Email address, phone number and any other contact details
- Title, gender
- Date of birth
- (Wish) function
- Curriculum vitae (CV), work experience, work location, languages, education and training data (certificates and diplomas)
- Photo (if you have given separate and express consent for this)
- BSN to check whether you are included in the UWV target group register
- Target group status/target group statement (if applicable)
- Screening information, including VOG, certificates, references
- Desired salary
- Availability (number of hours per week and which days of the week)
- Travel distance readiness
- Driving licence yes/no
- Type of ID proof and document number (if processed at registration)
- Audio transcription of an intake interview
- Name details, e-mail address and telephone number parent/guardian if under 16 years old
- Other data provided by you as part of the job placement process
- If you have been provided with a user name and password to access our private web and mine environments and/or (self-service) portals, this data is also processed by us.
- An Avatar, when you have created one in the mining environment

On handling applications for positions head office RGF Staffing

- NAW data (name, address, place of residence)
- Email address, phone number and any other contact details
- Date of birth, gender
- Curriculum vitae (CV), work location, work experience, education and training details

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- Photo (if you have given separate and express consent for this)
- Target group status/target group statement (if applicable)
- Other information provided by you in connection with the application

When you work or will work through us (posting to a client)

- The data listed above under 'job placement'
- Nationality
- Bank account number
- Staff number
- Policy or customer number health insurer
- BSN, type of ID proof and document number
- copy of ID card, copy of work permit, copy of residence permit (insofar as required by laws and/or regulations)
- Target group information/target group statement (if applicable)
- Screening information, including VOG, certificates, references
- Assessment data and data related to career guidance
- Details of job or former jobs
- Employment details
- Data relating to terms and conditions of employment and their implementation
- Details of family members where necessary for the purposes of the agreed terms and conditions of employment
- Attendance records (related to leave and absence, among other things)
- Reintegration files
- Username and password to access our private web and mine environments, (self-service) portals and/or our intranet
- An Avatar, when you have created one in the mining environment
- Other information required for the performance of your employment, assignment, agreement and/or work.

You are a business relation

- Business contact details
- Data for maintaining the relationship
- When a user name and password are provided to access our private web environments and/or (self-service) portals, this data is also processed by us.

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Basis of processing personal data

We process personal data on the following legal grounds:

- The processing is necessary for the **performance of an agreement** that is being or has been entered into and to which you are a party. Examples include entering into a service agreement, agreement to employment mediation, employment agreement or assignment agreement as explained under the aims "*Employment mediation and/or posting with a client*", "*Processing job applications head office RGF Staffing*" 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 fulfil a **legal obligation**, e.g. keeping a copy of your ID card in our records when entering into a temporary employment/detachment agreement.
- The processing is necessary in connection with a **legitimate (business) interest** that we have, to wit:
 - Maintain and improve our services, as well as develop new products and services;
 - legitimate business processes and activities, including generating management information and reports, performing market analysis, data analysis, record keeping, (internal and external) controls, audits and auditing, business transactions (partnerships, buying/selling) and promoting and maintaining corporate security;
 - compliance with or investigation of (suspected) violation of agreed arrangements, internal policies/instructions and/or laws and regulations;
 - defending our legal interests in all forms of dispute resolution;
 - to further inform you about our services, other activities and/or professional information (e.g. via e-mail, newsletters, company magazines and professional literature) after you have used our services, and to make you offers.
- Personal data are processed with your **consent**, for example, when you decide to submit a photo as part of your job application, or when you consent to audio transcriptions being made during a physical interview (for the purpose of improving our services, developing new products, and/or placing you with a client). You can revoke a given consent at any time, which means that from then on we will no longer process the personal data in question for the purpose for which consent was requested.

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Security of your information

We make every effort to take appropriate organisational and technical measures to secure 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.

How do we share your information?

Within our company

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

In the case of job placement, your personal data will be included in our central database and our company's job placement employees 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 analysis, issuing forecasts, controls (internal and external), audits and auditing, business transactions (joint ventures, buy/sell).

Some of Recruit's subsidiaries support us in developing analytical models aimed at improving our services and developing new products and services.

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

An adequacy decision has also been adopted for the Americas. The subsidiary in the Americas falls under the EU-U.S. Data Privacy Framework.

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

Outside our company

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

We share your personal data with external parties to perform the agreement we have entered into with you. For example, in the case of employment mediation, your personal data will be

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provided to potential clients. If you start working with or for us or if you already work with or 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 assignment agreement), which we have entered into with you (e.g. training bodies, 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, including cloud providers are used to store, manage your data;
- external parties are used with applications/tools including in the field of recruitment/assessment, job placement, personnel management and customer management;
- Other specific tasks outsourced include absence management, IT support and facility management;
- external advisers and consultants are engaged.

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

- Solid Online - based in the Netherlands with a 2nd 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 provisions) established by the European Commission are agreed and, where necessary, additional measures and agreements are made to ensure the best possible protection of your personal data.

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

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

We also provide your personal data to external parties, such as police and government agencies if we are entitled or required to do so under applicable laws and/or regulations, by court order or court judgment, or if you have given your consent.

How long do we keep your data?

Your personal data will be held in accordance with laws and regulations and for

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as long as necessary for the purposes for which they were collected.

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

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

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

- Employment data, application data, screening information, assessment data we keep for up to 2 years after the end of your temping period /employment agreement.
- We keep copies of ID proof, work permits including related documents and payroll tax statements for 5 years after the end of the calendar year of leaving employment.
- We keep reintegration files for 2 years after the end of the temporary employment /employment contract. In the event of self-insurance for the Sickness Benefits Act (ZW), a retention period of 5 years applies after the last action on the file. In the event of self-insurance for the WGA, a retention period of 10 years applies.
- We keep pension information for 7 years after loss of current value.
- We retain personal data and documents that are relevant for tax purposes (such as agency agreements/employment contracts, training arrangements, payroll records/data, grant statements) for 7 years after losing their current value.

For certain uses of data aimed at *maintaining and improving our services, or to develop new products and services*, such as the creation of analytical models, a longer time perspective may be needed, as some insights only become apparent after some 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 deadlines are applied.

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

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

Automated decision-making

In job placement, we use partially automated decision-making. This involves

- if you turn to us for mediation for a specific vacancy with one of our clients; or
- If you generally want to be mediated to work for one of our clients.

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

How does it work? If you wish to be mediated for a job/a specific vacancy, we receive information from you so that we can assess your suitability for a specific position. Based on this information, your suitability for a specific position will be assessed automatically, based on the objective requirements for that position. Our staff will then review these outcomes and assess whether you actually fit the position in question.

Internal controls are in place to ensure that automated decision-making is done correctly and objectively to ensure that everyone is treated equally and there is no discrimination.

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

What are your rights?

You can ask us at any time to access, modify, supplement or delete your personal data. In addition, you can ask us to limit the personal data we process about you and/or transfer your personal data (data portability).

Job candidates and flex employees can log into the Privacy Portal via 2-step verification. Via this self-service portal you can view, (partially) modify, add to, delete or transfer your personal data. The Privacy Portal can be accessed via a link at the bottom of each of our business units' websites. The Candidate Portal provides you with a comprehensive overview of your stored data and documents. You can access the Candidate Portal by logging in to the 'My' environment.

Right of objection

Also with concerns about the way we handle your personal data and/or

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if you do not or 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.

Your requests and/or objections can be addressed to our Data Protection Officer, please see the details under 'Contact'.

For questions, comments and complaints

If you have any questions, comments or complaints regarding this privacy statement or the way we record, use or process your personal data, please contact our Data Protection Officer, see details under 'Contact'.

You also have the right to file a complaint with the Personal Data Authority.

Contact

Ms C. Bos, Data protection officer (FG) privacy@rgfstaffing.nl
RGF Staffing Shared Services the Netherlands B.V.
P.J. Oudweg 61, 1314 CK Almere

Adjustments privacy statement

We may amend this privacy statement. The most up-to-date privacy statement can always be accessed via our websites.

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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 & Logistics B.V.
Start People Services B.V. (also h.o.d.n. ASA)
Start People Beheer B.V.
Start People Diensten B.V. (also h.o.d.n. ASA)
Start People B.V. (also h.o.d.n. ASA, Start People Medi-Interim)
Start People Staffing B.V. (also h.o.d.n. ASA)
Start People Uitzenden B.V. (also h.o.d.n. ASA)
Unique Nederland B.V. (also h.o.d.n. Technicum)
Unique Diensten B.V. (also h.o.d.n. Technicum)
Unique Staffing B.V. (also h.o.d.n. Technicum)
USG Professionals B.V. (also h.o.d.n. USG Finance, USG Legal, USG HRand 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 h.o.d.n. Secretary Plus Direct Team)