



## Privacy statement for Niacet b.v. employees and job applicants

### Introduction

Our organization is committed to meeting the requirements of the General Data Protection Regulation (GDPR). We also feel it is important to give you as a job applicant or employee information about:

- the personal data relating to you that we process;
- how we do this;
- the provision of data to others in and outside Europe;
- how long we keep your data and;
- how we protect this data.

In this privacy statement we also want to inform you about your rights. Finally, we want you to know who you can contact if you have any questions, requests or complaints. We ask you to read this information carefully.

**Personal data** is any information relating to an identified or identifiable natural person. For you, this means that the information is directly about you or this information can be traced to you. Examples include your name, date of birth and address, but also your employee ID, business email address or business telephone number.

The **processing of personal data** refers to any operations we can perform on your personal data, from collection up to and including destruction. It is therefore a very broad concept.

The operations specifically include: the collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure and destruction of data.

### Grounds on which we are legally permitted to process your data

We process your data for one or more of the following reasons. These are specific by law:

- the data is necessary in order to decide whether we want to enter into an employment contract with you;
- the data is necessary in order to conclude and/or implement the employment contract;
- the data is necessary for us to comply with a legal obligation (for example making the correct tax and premium deductions or the duty to provide proof of identity);
- the data is necessary for the purposes of our legitimate interests as an organization (for example in the event of ongoing legal proceedings – or the risk thereof – and we need to be able to put forward a defense) or;
- to protect your vital interests (for instance in an emergency such as an accident or if you have a condition that requires acute care). In that case we need access to your personal data to do things like administer medicines (e.g. health information in the case of a serious allergy, epilepsy or diabetes), organize assistance or inform others (such as your family members);
- for some operations we need your clear and unequivocal consent.

### Obligation to provide data

You are obliged to provide us with the data requested if it is necessary for us to process this

data for example to conclude or implement an employment contract and/or to comply with a legal obligation. Other examples include data required to register you for a pension scheme, group insurance or a company car scheme. In these situations you cannot refuse to provide the data. If you do, this could mean that we choose not to employ you or that you will be unable to take advantage of certain benefits.

### **The personal data relating to you that we process**

We only process the following **data** relating to you

#### ***Applicants***

- your surname, first names, initials, any title, gender, date of birth, address, postcode, place of residence, telephone number and other information we need to communicate with you, such as your email address;
- details of your past and future training, courses and work placements;
- information about the position you are applying for;
- information about the nature and content of your current job, and information about the termination of this current job;
- information about the nature and content of previous jobs you have had and about the termination of these jobs;
- other information with a view to the performance of the role, provided by you or known to you;
- other information required for the implementation or application of a law.

The above data will only be processed for one or more of the following **purposes**:

- the assessment of your suitability for a position that is currently or may become available;
- internal control and company security;
- implementing or applying a law.

#### ***Employees***

We only process the following **data** relating to you in our **personnel administration**:

- your surname, first names, initials, any title, gender, date of birth, address, postcode, place of residence, telephone number and other information we need to communicate with you, such as your email address;
- your bank account number;
- an administration number that contains no other information than that referred to under point one;
- your nationality and place of birth;
- details of your past and future training, courses and work placements;
- information about your position or your previous position and information about the nature, content and termination of your employment contract;
- information for the purpose of recording your attendance at the location where the work is carried out;
- information for the purpose of recording your absence in connection with leave, maternity or illness, except information about the nature of the illness;
- information recorded in your interest for the purpose of your working conditions;
- information that is necessary for the purpose of an agreed term or condition of employment. Where relevant, this can include information about your family members and former family members;

- information for the purpose of organizing and carrying out staff appraisals and career guidance, in so far as this information is known to you;
- information required for the implementation or application of a law.

The above data will only be processed for one or more of the following **purposes**:

- supervising your activities;
- dealing with personnel matters;
- determining and arranging payment of your salary;
- organizing entitlement to payments in connection with the termination of your employment contract;
- your training;
- company medical care that applies to you;
- electing members of a works council or employee representative body;
- internal control and company security;
- implementation of a term or condition of employment that applies to you;
- drawing up a list of long-service anniversaries;
- granting dismissal;
- managing records relating to retirees, the staff association and the Special Provisions Fund;
- handling disputes and having audits performed;
- implementing or applying another law.

We only process the following **data** relating to you in our **payroll administration**:

- your surname, first names, initials, any title, gender, date of birth, address, postcode, place of residence, telephone number and similar data required for communication, and your bank account number;
- an administration number that contains no other information than that referred to under the previous point;
- your nationality and place of birth;
- information for the purpose of calculating, recording and paying your salary, reimbursements and other monetary sums and benefits in kind to you or for your benefit;
- information for the purpose of calculating, recording and paying taxes and premiums on your behalf;
- information that is necessary for the purpose of a term or condition of employment that applies to you. Where relevant, this can include information relating to your family members and former family members;
- information required for the implementation or application of a law.

The above data will only be processed for one or more of the following **purposes**:

- calculating, recording and paying your salary, reimbursements and other monetary sums and benefits in kind to you or for your benefit;
- calculating, recording and paying taxes and premiums on your behalf;
- a term or condition of employment that applies to you;
- personnel administration;
- organizing entitlement to payments in connection with the end of your employment contract;
- your permanent or temporary transfer to another member of the group of companies of which we are part;
- granting dismissal;
- debt collection, including entrusting third parties with debt collection;
- handling disputes and having audits performed;



- implementing or applying another law.

### **Sharing your personal data**

In principle, we only use your personal data for our own purposes (our own business operations) in the context of the application process and implementation of an employment contract. We only use this data for the purposes for which we obtained the data. It may sometimes be necessary to share your data with others, for instance a party that processes data on our behalf. Here are a few examples:

- payroll processing: data is provided to our payroll bureau and the tax authorities;
- sickness and reintegration: data is provided to the company doctor/occupational health and safety service and/or the Employee Insurance Agency (UWV);
- wage garnishment: data is provided to the enforcement agent;
- pension processing: data is provided to the pension insurer;
- obtaining personalized PPE: data is provided to PPE suppliers;
- travel agency for booking business trips;
- leasing company for use and administration of lease car.

Where necessary, we enter into data processing agreements with parties that process personal data on our behalf ('processors'). We do this so that when we provide them with data a number of clear agreements are in place, for example that they too will duly protect this data and that they must promptly inform us of any actual or suspected data breach.

### **Retention of your personal data**

Our guiding principle when retaining personal data is that we do not retain this data for any longer than necessary for the purpose for which we processed it. We observe any applicable statutory retention periods. We may retain data for a longer period if it is in our legitimate interest to do so (for example if there are ongoing or pending legal proceedings and we need to be able to put forward a defense).

If the selection procedure has ended for an applicant and no employment contract is being entered into, his or her personal data will be destroyed within four weeks.

### **Protection of your personal data**

We have physical, administrative, organizational and technical measures in place to protect your personal data. The data is stored internally on our own server, which is protected by a firewall. The server has a structure that organizes the authorizations for each department and each folder.

Only employees we have authorized have access to your data. These employees have signed an additional nondisclosure agreement to this end. This means there is an adequate level of protection. We also make regular adjustments where necessary.

### **Your rights**

In accordance with the GDPR, you have the right to request the following from us in relation to your personal data that we process:

- access to your data, such as your personnel file (including personal notes of your supervisor(s) or others within our organization, when these are included in your employee file);
- a copy of your data (including personal notes of your supervisor(s) or others

- within our organization, when these are included in your employee file);
- information about the processing of your data (which is also provided in this privacy statement, however you may have further questions that are not answered here);
  - the rectification of inaccurate information (please note: you cannot have a performance report or appraisal report rectified if you do not agree with it. In that case you can draw up a statement and have this added to your personnel file);
  - the completion of incomplete data if necessary for the purposes of the processing;
  - in some cases the erasure of your data (please note: we are not obliged to grant such requests if it is in our legitimate interest to retain your data for a longer period, or if we need to retain the data in connection with implementing your employment contract or to comply with a legal obligation or for another reason laid down by law);
  - in some cases the 'restriction' of the data relating to you that we process (please note: we endeavor to collect as little data as possible [data minimization]);
  - in some cases to object to the use of your data;
  - if you have given consent for the use of your data (such as the use of your photo on a 'who's who' page or on our website), to withdraw this consent. The withdrawal will then apply to any future use of your data;
  - if you have provided the data yourself or if you have created data (e.g. based on your use of our ADP ESS system) and you have given consent for this or the data is necessary for the performance of the agreement, and if the data is processed digitally: to receive your data in a commonly used format and, where technically feasible, to have this data transmitted to another party in this format;
  - to submit a complaint to the competent organization that supervises compliance with privacy legislation in the Netherlands. This is the Dutch Data Protection Authority (AP) in The Hague. In this case we would appreciate it if you would first contact us to check whether we can resolve your complaint.

If you wish to exercise your rights, you can get in touch with the contact(s) named in this privacy statement. If we have valid grounds to refuse your request, we will explain these grounds.

### **Contact(s)**

If you have any questions, requests or complaints regarding the processing of your personal data you can contact Sigrid Kingma, Executive Assistant, email [sigrid.kingma@niacet.nl](mailto:sigrid.kingma@niacet.nl), telephone 0344639115/062710071 or Anneke de Leeuw, HR Specialist, email [anneke.deleeuw@niacet.nl](mailto:anneke.deleeuw@niacet.nl), telephone 0344639181.

### **Date and amendment of the privacy statement**

We retain the right to amend this privacy statement. We will notify you of any significant changes.

This privacy statement is dated July 17, 2018 (version 1).