

## **Privacy Statement**

# 1. Introduction and scope

This is the Privacy Statement of Vanderkamp Group B.V. and its affiliated organisations (hereinafter: Vanderkamp). The protection of your personal data is very important to Vanderkamp. We strive to provide clear and transparent information on how we handle your personal data in this Privacy Statement.

We do our utmost to safeguard your privacy and therefore handle personal data with care. Vanderkamp always complies with the applicable laws and regulations, including the General Data Protection Regulation (hereinafter: the GDPR). This means that we in any event:

- Process your personal data in accordance with the purpose for which they were provided. The purposes and type of personal data are described in this Privacy Statement.
- Limit the processing of your personal data to those data that are at any rate necessary for the purposes for which they are processed.
- Only process personal data if there is a reason for doing so.
- Take appropriate technical and organisational measures to ensure the security of your personal data.
- Do not pass on personal data to other parties, unless this is necessary for carrying out the purposes for which they have been provided.
- Are aware of your rights concerning your personal data, wish to inform you of your rights and we respect them.

This Privacy Statement applies to all persons who have contact with Vanderkamp with the exception of its employees. More specifically, this means that this Privacy Statement applies to:

- Service recipients and service partners;
- Applicants;
- Visitors:
- Visitors to the website;
- Other contacts.

As Vanderkamp, we are responsible for the processing of your personal data. If, after reading our Privacy Statement, you have any questions about our Privacy Statement or if you have any other questions or wish to contact us, please do so by using the contact details at the bottom of this document.

## 2. What personal data can we process

Below we set out what personal data Vanderkamp can process about you.

- First name, surname prefix, surname;
- Gender;
- Nationality;
- Data regarding your gender and date of birth;
- Data following a telephone conversation with you;
- Data from an email received from you;
- Business or other address;
- Place of business or place of residence;
- Business or other phone number;
- Business or other e-mail address;



- Business or other bank details;
- Application letter and/or curriculum vitae;
- Employment history data, such as references;
- Data regarding the course(s) you followed;
- Your IP address;
- Data regarding your activities on our website;
- Data regarding your Internet browser and device type;
- Your location data;
- Camera footage (at specific places signs are displayed telling you about the CCTV monitoring);
- Data that is available through public sources and that you appear to have made publicly available, such as on social media and business websites.

## 3. Why we process your personal data

We use your personal data for the following purposes:

- To verify your identity;
- To provide our services;
- To improve our services and the security thereof by, for example, the carrying out of checks;
- To keep you informed of news, developments, and our services;
- For internal quality purposes;
- For recruitment and selection;
- To be able to contact you and respond to your questions;
- To prevent theft, abuse, destruction or other criminal behaviour;
- To provide information and send invitations;
- For marketing, evaluation and online services;
- To administer, secure, adapt and improve our website.

## 4. Our bases for processing personal data

In order to be able to process personal data, we must have a basis as laid down in the GDPR. We apply the following bases:

- You have given Vanderkamp your consent to process your personal data;
- The use of your personal data is necessary to perform or enter into an agreement with you;
- The use of your personal data is necessary to comply with a legal obligation;
- We have a legitimate interest in using your personal data, unless your privacy interests outweigh our interests.

Vanderkamp is entitled invoke the following legitimate interests:

- Vanderkamp's interest in being informed about the employment history of job applicants;
- The protection of your safety, the safety of customers and/or others, and the protection of Vanderkamp's premises and property;
- For quality and training purposes;
- To promote IT management and improve security;
- To analyse and improve the services and content of our websites;
- To deliver and improve our services.

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# 5. Provision of personal data to third parties

We may disclose the information you provide to us to third parties if this is necessary for the performance of the purposes described above.

We may also engage the services of a third party to:

- Handle the ICT/Internet environment;
- Keep the (financial and salary) administrative accounts;
- Keep occupational health (ARBO)/absence records and handle occupational health counselling.

If we engage other parties (processors) to process your personal data, we will of course make the necessary arrangements to ensure your personal data is secure. Furthermore, we will not provide the information provided by you to parties other than those listed above, unless required and permitted by law. An example of this is that the police request personal or other data from us as part of an investigation. In such case, we must cooperate and are therefore obliged to provide this information. We are also entitled to share personal data with third parties for purposes other than those mentioned above if you give us written permission to do so. We will not provide personal data to parties located outside the

Vanderkamp always remains responsible for the processing of your personal data. Vanderkamp therefore concludes agreements with third parties to ensure that your personal data is properly protected. Vanderkamp is entitled to share your personal data with a third party, such as a potential buyer or seller, in the event of a merger, takeover or sale of the whole or part of its organisation. Naturally, we will inform you of this by e-mail or a clearly visible notice on our website and also inform you about your rights in this situation.

#### 6. Minors

We process the personal data of persons under the age of 16 only if written consent has been given by the parent, guardian or legal representative.

#### 7. Retention period

Vanderkamp never retains personal data longer than is necessary for the purpose for which it was provided. Vanderkamp will retain your personal data for as long as we deem it necessary to provide services, to enable you to use the website, to comply with applicable laws, to resolve disputes with parties and otherwise to the extent necessary to enable us to carry out our business activities. In addition to the above, Vanderkamp applies the following retention periods:

- The period during which you have an agreement with Vanderkamp, thereafter for a maximum of seven years in the personnel dossier and a maximum of seven years in the financial administrative records.
- If you have not been given the job, we will retain your job application data for a maximum of four weeks after the end of the application procedure. We will only keep your data for a longer period of time, if you have given us your permission to do so, or if you have entered the employment of Vanderkamp.
- Vanderkamp will store any CCTV footage for a maximum of four weeks, unless longer storage is required in connection with an incident.

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## 8. Security

Vanderkamp has taken appropriate technical and organisational measures to protect your personal data against unlawful processing. For example, we have taken the following measures:

- All persons entitled to access your data on behalf of Vanderkamp are bound to secrecy;
- Vanderkamp has a username and password policy for all our systems;
- Vanderkamp pseudonymizes and ensures the encryption of personal data if there is reason to do
- Paper files are stored in locked filing cabinets with appropriate key management protection;
- Vanderkamp backs up the personal data in order to be able to recover it in the event of any physical or technical incidents;
- Vanderkamp checks and evaluates its measures on a regular basis;
- Vanderkamp employees are made aware of the importance of protecting personal data.

#### 9. Your rights

You have the right to inspect, rectify or delete the personal data that we have received from you. You also have the right to object to the processing of all or part of your personal data by us or one of our processors. In some cases you may also submit a request to temporarily restrict the processing of your personal data. You also have the right to have us transfer the data provided by you to yourself or on your instruction directly to another party. We might ask you to identify yourself before we can respond to the aforementioned requests.

If we are allowed to process your personal data on the basis of the consent you have given us, you always have the right to revoke this consent. We will then no longer process your personal data. You can withdraw your consent and exercise your other rights by contacting us using the contact details below.

#### 10. Complaints

If you have a complaint about the processing of your personal data, please contact us about this immediately. Should we be unable to resolve the matter together with you, it goes without saying that we find this most unfortunate. You always have the right to file a complaint with the Dutch Data Protection Authority or to start legal proceedings. The Dutch Data Protection Authority is the supervisory authority in the field of the protection of privacy.

#### 11. Contact details

If you have any questions or comments regarding this Privacy Statement, please contact us.

Vanderkamp Pompen B.V. Mr H. Werkman Hoekerweg 1 8042 PH Zwolle

E-mail: h.werkman@vdkamp.eu



# 12. Amendments and applicable law

Our Privacy Statement might need to be updated. The latest version will always be available on our website. None of the provisions of this Privacy Statement are intended to create an obligation or agreement between Vanderkamp and you. Dutch law will apply to the provisions of this Privacy Statement and all disputes arising therefrom.

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