

privacy statement for applicants and employees (applicant, temporary worker, domestic help)

At Randstad we attach great importance to protecting the personal privacy of all people whose data we compile. We treat and protect this data with the utmost care, in accordance with the applicable laws in Belgium¹.

We do everything to protect the data supplied to us against loss, destruction, publication, unauthorised access or improper use.

In this privacy statement we explain who we are and why we require your personal data, which data we compile, how and for how long we process it, who we can pass it on to, what your rights are and how you can exert them.

This privacy statement is intended for you if:

1. You register at Randstad or have yourself registered to be guided by us in your search for work, whether or not as a temporary worker.
2. You apply at Randstad for employment as a temporary worker at one of our customers, as a domestic help, for permanent recruitment at one of our customers or at Randstad itself.
3. You work at Randstad as a temporary worker or as a domestic help.

a. who we are

The following partnerships (jointly referred to as Randstad): Randstad Belgium nv, Randstad Household Services nv, Randstad Construct nv, all situated in Access Building, Keizer Karellaan, 586 bus 8, 1082 Brussels, are each responsible for the processing of your personal details (Controller in the sense of the GDPR).

b. when do we compile your personal details?

¹ These are the Act of 8 December 1992 on the protection of privacy with regard to the processing of personal data (Privacy Act) and Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons in relation to the processing of personal data and the free movement of this data (GDPR).

We compile your data as soon as you enter your data or leave it on our website or on one of our IT applications/tools, if you register at one of our offices/HR centres or if you register in another way (e.g. job fair) or have yourself registered (e.g. for temporary work via own selection of a user) to be able to make use of our services.

We can also compile your data if you have made this public on public/social media (e.g. LinkedIn) which could indicate that you are interested in work-related services. In this case, we will ask you first whether you are interested in registering with us in accordance with our conditions and taking account of this privacy statement. If you are not interested, we can process a limited number of data in order to meet your wish not to be approached by us.

c. why do we need your personal details?

We compile your personal details for the objectives mentioned below and will not use this data for other purposes without informing you in advance and, if necessary, asking your permission.

We use your data for the execution of the HR service for which you registered with us, including employment-finding, temporary work, employment as a domestic help as part of service vouchers, project sourcing (carrying out projects at customers or as a permanent employee of Randstad), recruitment & selection, personal development and availability, wage administration and personnel management.

More specifically, we use your personal details to, as the case may be,

1. Include you in our applicant database we look through to select suitable candidates for the jobs we recruit for (as a temporary worker, domestic help, permanent or temporary employee at one of the customers of Randstad or at Randstad itself).
If we would solely work with automated-based selections, including profiling, without any job service assistance of a consultant, in the future, then we will inform you, if requested, about the existence, the underlying logic, your interest and the expected consequences for you.
2. Be able to determine your profile and be able to assess your suitability as candidate for the jobs we are recruiting for. Here we may use, among others, the results of tests you have taken (online personality tests, language tests, assessments, etc.) and (online) reference checks we only carry out with your explicit permission at the people/companies you indicated. We may also ask you to provide more information about yourself on a voluntary basis to increase your chances of finding work.
3. Be able to proactively introduce your profile, including your cv, to customers of Randstad.
4. Offer you interesting vacancies and job offers by phone, e-mail, text message or other media. You can manage your contact details yourself via your online profile on my Randstad or via your consultant at your Randstad office. This is partly done by our consultants and is partly automated (for instance, via job alerts you created on our website).
5. Provide you with information about the services and other activities of Randstad (e.g. job fairs or other events that may interest you) and be able to better align this to your wishes and competencies.

6. Promote your personal development and availability by offering, among others, short training courses, guidance, workshops, etc. at one of the partnerships of Randstad itself or a third party.
7. Enter into a job placement relation with you and maintain this by carrying out the relevant administration for this.
8. Enter into an employer relation with you and maintain it by carrying out the relevant administration such as staff management, wage processing, wellbeing at work, industrial medicine (medical examinations), etc.
9. Approach you for commercial offers, newsletters and promotions/marketing campaigns of Randstad (e.g. invitations to take part in competitions, information about events organised by Randstad, etc.) that may be of interest to you, if you have given permission for this (via your profile on my Randstad or via your consultant at your Randstad office).
10. Request subsidies (social security reductions, advance tax payment exemptions, premiums, etc.).
11. Observe legal obligations, such as, among others, correct personal identification, application of labour, tax and social security legislation, combating fraud, illegal employment and terrorism, applying national and international sanction legislation, etc.
12. Meet certain quality objectives, such as obtaining and keeping certain certificates or quality labels.
13. Monitor and measure the quality of our services. To this end we ourselves, or a third party we have commissioned to do so, may ask you to take part in surveys and use the obtained information and process it to improve the quality of our services.
14. Meet management objectives, including providing management information, carrying out internal checks to prevent fraud and to carry out (internal/external) audits and accounting audits.
15. Be able to provide statistical information for studies of interest to Randstad or our sector federation Federgon (professional organisations of HR service providers). In this case, we use aggregated personal data, whereby you are not individually identifiable in the results that are made public by Randstad or shared with third parties.
16. Guarantee company safety. To this end we may, for instance, check your identity when accessing one of our offices. We can also check the activities in our systems to prevent misuse of the information of our databases and to protect our interests and those of all people included in our databases.
17. Allow you to exert your rights (also see point H) and to indicate later on why we acted upon these rights.

We use and process your personal details, depending on the type of processing, on the basis of:

1. **your consent:** during online registration or registration in an office you give us your consent online via your profile on my Randstad or via the specific form to process your personal details in the framework of job service and selection activities, for taking your references with

people/companies you gave or for receiving commercial offers.

2. **our (pre)contractual relation:** when we enter into an employment contract with you we require some data to be able to draw up this contract and to then be able to execute it correctly. As you usually work at one of our customers, we also always need your contact details to be able to meet our contractual duties and we will exchange information about you with our customers concerning your performance.
3. **the legal obligations of Randstad:** our service is subject to many legal obligations. We require all information on time and for the full duration of these obligations that is necessary to be able to meet these obligations or to be able to indicate during a check that we met them. For instance, we have to report your employment to the government (Dimona declaration), to calculate your wages correctly and pay them to your bank account on time and to declare your performance to several social security bodies and the tax department on time.
4. **the legitimate interest of Randstad or of a third party:** if necessary, we use your details to meet justified interests of Randstad or of third parties. This can, for instance, be done for access or internal control and audits to guarantee the safety and continuity of our systems and partnerships. This legitimate interest is also present when we need to file your data as part of establishing, implementing or substantiating a possible legal procedure.

d. which of your personal details do we process?

We process the personal details that are required for our service. Some of these details (e.g. identity, education, work experience, etc.) is obligatory to be able to make use of our services. Additional data (e.g. references, personal preferences for specific jobs, application letters, complete cv, etc.) is not compulsory but may be desirable to better align our services to your wishes and qualities or to meet more specific questions or obligations coming from customers of Randstad. If you choose to provide us with your information, we can use it and share it with customers as part of your employment-finding or employment.

You are responsible for the correctness and relevance of the data you provide us with. It's best to pass on any changes in your personal details as soon as possible, either online via your profile on my Randstad, or to your consultant at your Randstad office or HR centre.

It concerns, among others, the following personal details:

1. name, address, e-mail address, telephone number and other contact information;
2. place and date of birth, sex, marital status;
3. nationality and, if necessary, proof of identity, work permit and residence permit (inspection obligatory on the basis of legislation of the employment of foreign employees);
4. social security number (a unique identification number in our IT systems and as part of the compulsory declarations to and contact with the various public bodies);

5. curriculum vitae (cv), cover letter, information about education/training courses and work experience, data made public (including social media), information you give to our consultant or our customer during (job) interviews with them;
6. photos and video introduction (on a voluntary basis only);
7. data, including results, about training courses and education and/or tests/assessments you took yourself or via Randstad;
8. other information that may be of importance as part of the assessment of your suitability as a candidate, such as certificates and references (with your consent only);
9. data about your availability and holiday periods;
10. evaluations of your knowledge, skills, attitude, etc. ;
11. other data that is required for a correct administrative settlement (staff management, wage processing and payment, registration of absence, etc.).

Which particular personal details we may possibly compile:

1. excerpt of your criminal record: we only ask this if this is a statutory requirement for Randstad or for the customer we employ you with.
2. health data: we do not process any health data except for in the framework of legislation on wellbeing at work (medical inspection certificates) and the declaration and administration of industrial accidents. If you pass on personal details about your health condition voluntarily, we will only register this data at your explicit request and only if it could have an impact on your search for work and the tasks to be carried out by you.

e. who do we share your personal details with?

Only if necessary for the execution of your job service or employment, the realisation of objectives mentioned under point C, observing the statutory requirement (of Randstad or of a third party) or the protection of a justified interest (of Randstad or of a third party) can Randstad transfer some of your personal details:

1. to other partnerships of the Randstad group in Belgium (Randstad Outsourcing nv, Randstad Professionals nv (RiseSmart), Randstad Group Belgium nv and Randstad Soureceright nv), for among other reasons:
 - offering supportive activities as part of your search for work/professional development (workshops, job offer, etc.);
 - internal provision of service (administrative tasks concerning your job service and employment, IT services, etc.);
 - promotions and marketing campaigns (provided that you gave consent for this);

2. to the holding company of Randstad, or other partnerships in the Randstad group for among others:
 - management information;
 - internal audits;
 - internal services;
 - screening people as part of the European legislation on financial sanctions (financing terrorism);

3. to customers of Randstad, or their clients, agents or representatives, for among others:
 - selection of suitable candidates for filling a vacancy as temporary worker, domestic help or permanent employee;
 - proactive presentation of your profile and cv;
 - integration of your details in the staff management systems of customers (for temporary work);
 - exchange of all data related to your performance as a temporary worker or domestic help;
 - billing of the service;
 - customer audits;

4. to suppliers of Randstad, for among others:
 - providing services or carrying out tasks and orders on behalf and at the expense of Randstad (e.g. IT providers, cloud providers, employers' social-accounting secretariat, research bureaus, entrance security access, submitting subsidy dossiers, etc.);
 - providing services to Randstad as part of employment (e.g. external medical prevention services, suppliers of luncheon and eco vouchers, insurance companies, etc.);

5. to our auditors, audit and certification agencies, for among others:
 - audit of our annual accounts;
 - obtaining and preserving certain certificates;
 - audit of subsidy dossiers (e.g. European Social Fund);

6. to (the audit firm or research bureau of) Federgon (professional organisations of the HR service providers), for among others:
 - obtaining and preserving the Federgon quality label;
 - scientific research;
 - satisfaction surveys;
 - statistical purposes;

7. to various public bodies, such as, among others:
 - federal and regional inspection services and accreditation bodies;
 - social security departments;
 - tax authorities;
 - sectoral funds for social security (e.g. Christmas bonus for temporary workers);

8. to all other third parties we are obliged to by law, court order or decree.

Randstad will not sell, lease or make your personal details available for commercial purposes to third parties, unless you have given prior consent.

As Randstad develops its business, Randstad might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, your personal details and other information may be part of the transferred assets.

If our suppliers process your personal details for Randstad, they act as processors as laid down in the GDPR. We conclude a processing agreement with these processors and do everything in our power to ensure that they sufficiently protect your personal details.

Your personal details can in certain cases be passed on outside Belgium and the European Union. Randstad takes the necessary contractual and technical security measures to ensure that all personal details passed on are adequately protected against loss or unlawful processing. For further questions about this, contact the Data Protection Officer (see further).

f. how long do we keep your personal details?

We guarantee that we do not keep your details for longer than is required by law or in the internal regulations applicable within our businesses.

The standard filing periods depend on the objectives for which we process your details and/or whether you are employed by Randstad.

We apply the following filing periods to the job services data you provide us with via your online profile in my Randstad, on our website www.randstad.be or via registration at a consultant in a Randstad office or HR centre:

- All personal details we require to support you in your search for work (cvs, education, work expectations, etc.) remain actively available in our database as long as your job services dossier is updated. The latter is done each time you or Randstad take action concerning your dossier (e.g. addition of a recent work experience, addition of an updated cv, contact for a vacancy, training or job offer, etc.).
- After 12 months of inactivity in your dossier you will automatically get an e-mail asking you whether you still want to actively find a job via Randstad. In case of a negative answer we will only file your data passively for a period of four years due to certain statutory periods of limitation.
- In case of a lacking answer or a positive answer without further updating of your job services dossier we will again inform you by e-mail 12 months later that we will only file your data passively for a period of three years due to certain statutory periods of limitation, unless you decide to update your dossier again.

If you also work or have worked for Randstad, we will save all your employment data (identification, performances, wage information, multifunctional declaration at the social security department, tax declaration, etc.) for a period of 10 years after the end of your employment contract. We do this to meet a variety of social, fiscal and other legal obligations and periods of limitation.

g. security measures?

Randstad does everything in its power to optimally protect your personal details against unlawful use. We do this on the basis of physical, administrative and technological measures.

For example: only authorised persons get access to our offices and our systems, and access is limited to the systems they require for professional purposes. These people must know our internal policy on privacy and data protection and be able to apply it correctly. If and insofar as data is provided to third parties, Randstad agrees with these third parties that they will also optimally protect the personal details.

h. what are your rights?

Randstad processes your personal details in accordance with the stipulations of this privacy statement. As an involved party you have a number of rights you can exert at any time.

You can exert the following rights:

- **right of refusal or withdrawal of your consent**

We will not use your details if you don't give us consent to use your personal details to guide you towards finding work, but you will also not be able to use the Randstad job services.

Once you have given your consent to help you find work, you can also withdraw this consent. This will result in the removal of your job services dossier according to the right to remove data (see further).

To withdraw your consent to use your personal details for promotions and marketing campaigns of Randstad you have to adjust your online profile on my Randstad where you can manage your consent for receiving marketing campaigns by e-mail or text message without any intervention of Randstad. If you don't have an online profile, then you have to do this via your consultant at your Randstad office, who will let you sign a document for this.

Withdrawing your consent doesn't have an influence on the lawfulness of the processing of this data before the withdrawal or the lawfulness of the processing of (some of) the same data for others reasons, as listed in point C of this privacy statement.

- **right to object**

You can object to the processing of your personal details. You can only do this against processing based on the justified interests of Randstad or of a third party (see higher in point C). In the exertion of this right you will have to submit the form indicating which processing you oppose and for which specific reasons. This is necessary in order to be able to make a correct balance of interest.

- **right of access**

You can ask for a decisive answer about whether or not to process your personal details. If this is the case, you can request the following information: the reasons for processing, the categories of your personal details that we file, the categories of the recipients (third countries or international organisations), the filing periods or the criteria to determine these, your other rights, number of sources of origin of your data and the existence of automated decision-making. When providing this information we must always take account of the rights and freedoms of others.

If you have an online profile on my Randstad, then you can automatically view a large part of the personal details registered about (and by) you.

- **right to rectification (improvement and addition)**

You can request the rectification of all incorrect or incomplete (personal) details. In the exertion of this right you will have to indicate in the form which data you want to rectify or complete.

If you have an online profile on my Randstad then you can, without any intervention from Randstad, adapt and complete a large part of your personal details yourself.

Incorrect objective personal details (e.g. incorrect spelling of your name, wrong address, etc.) are always rectified as requested. Subjective personal details you believe are incorrect (e.g. negative evaluation, unfavourable test results, etc.) are only adapted if we agree with you. If not, then we will not adapt these personal details, but will note your possible additional statements about this.

- **right to data portability**

You have the right to transfer the personal details you have submitted to Randstad yourself in electronic form to yourself (via the e-mail address you give on your application form) or to a person with processing responsibility you indicated (via his e-mail address you give on your application form).

- **right to erasure (right to be forgotten)**

In cases foreseen by the GDPR, including the withdrawal of your consent to be helped in finding work by Randstad, we will remove your job services dossier.

Depending on the situation you are in at the time of exerting this right, this can have varying consequences:

- You **never** worked for Randstad:
The data of your job services dossier at Randstad is erased, including your online profile on my Randstad.
- You worked as a temporary worker or domestic help for Randstad in the **past**:
The data of your job services dossier at Randstad is erased.
The data of your employment dossier cannot be removed for statutory reasons and will be filed by Randstad up to a decade after the end of your employment.
Your online profile on my Randstad is not closed but limited to the data in “my documents” so you continue to have access to all your employment documents.
- You are working as a temporary worker or domestic help for Randstad **at the time of exerting this right**:
The consequences are the same as when you worked for Randstad in the past (see previous point).
However, when you choose this option, you will no longer be able to work for Randstad.
If you want to continue your assignment, it’s best to wait with your request until the end of such assignment. .
If you have an online profile on my Randstad, then you can already withdraw your consent for receiving e-mails and text messages with work offers. If you don’t have an online profile, you can ask your consultant at your Randstad office.
You can also ask your consultant to note down in your dossier that you no longer wish to be helped in your search for work.

- **right to restriction of processing**

You have the right to obtain restriction of processing of your personal details if:

- You contest the correctness of your personal details (for the duration of the checking by Randstad).
- The processing of your personal details by Randstad would be unlawful, but you don’t want to invoke your right to erase data.
- We no longer need your personal details for the purposes included in this privacy statement (point C), but you do need them for instituting, executing or substantiating a legal procedure.
- You made an objection against the processing of some of your personal details (for the duration of the balance of interest).

You can in principle exert your rights free of charge. You can do this by making use of the form we make available for this in your online profile on my Randstad. If you don’t have an online profile, you should

use the form that can be found on our website www.randstad.be. You can download this form yourself or ask your consultant at a Randstad office.

On the form you can find further instructions for filling in and sending your request.

If you submit your form via your online profile on my Randstad, we in principle have enough information to be able to properly identify you and we don't require further proof of identity. This is why you should always make sure that you never pass on your login data and password of the online profile my Randstad to others.

If you submit your request in another way, you must always send along a copy of your identity card so we can be certain of the applicant's identity. Without this copy your request will not be treated.

We will inform you in writing about what we are doing with your request a month after receipt of your completely filled in and properly sent form at the latest.

Depending on how difficult your request is or the number of requests we get from other people, this period may be extended by two months. In this case we will inform you about this extension within a month after receipt of your form.

In some cases (e.g. legal obligations, rights of others, periods of limitation, etc.) you will not be able to or be able to fully exert your rights. You will then get a message about this with the reason why we cannot or can't fully meet your request.

i. cookies

On our domain randstad.be we use cookies and web statistics. We do this to view how visitors use our website. This information helps us improve the site. A cookie is a file stored on your computer. These cookies can be recognised during a future visit to our website. You can read more about this in our Cookie Policy on our website.

j. questions, remarks, complaints and data leaks

If you have any questions, remarks or complaints about the protection of your personal details by Randstad or about this privacy statement, contact the Randstad Data Protection Officer via privacy@randstadgroup.be.

You also have the right to file a complaint with the Data Protection Authority (DPA) at the following address: Drukpersstraat 35, 1000 Brussels.

If you know about a data leak, or you assume a data leak, please immediately pass this on to us via information.security@randstadgroup.be.

k. changes

Randstad can for various reasons make improvements, additions or changes to this privacy statement. The most up-to-date version can always be viewed on the Randstad website. This version was drawn up in May 2018.