

PRIVACY STATEMENT

CONTENT

1. WHO IS WAES?
2. WHAT IS PERSONAL DATA?
3. WHICH PERSONAL DATA DOES WAES PROCESS AND FOR WHAT PURPOSE?
4. WHAT RIGHTS DO DATA SUBJECTS HAVE?
5. WHEN DOES WAES SHARE PERSONAL DATA?
6. HOW LONG DOES WAES RETAIN PERSONAL DATA?
7. HOW DOES WAES PROTECT PERSONAL DATA?
8. WHAT ARE COOKIES AND OTHER SIMILAR TECHNICAL DATA?
9. HOW TO CONTACT WAES?
10. NOTIFICATION OF A SUSPECTED OR CONFIRMED SECURITY BREACH
11. AMENDMENTS TO THE PRIVACY STATEMENT
12. OVERVIEW OF THE PURPOSES OF PROCESSING AND THE TYPES OF PERSONAL DATA PROCESSED

WHO IS WAES?

WAES HOLDING B.V. (DUTCH CHAMBER OF COMMERCE [KVK] NO. 70549273), INCLUDING ITS SUBSIDIARIES (HEREINAFTER REFERRED TO AS: 'WAES'), IS A BUSINESS SERVICES PROVIDER SPECIALISED IN CONSULTANCY SERVICES PROVIDED BY HIGHLY QUALIFIED TECHNICAL STAFF AND FLEXIBLE DEPLOYMENT OF KNOWLEDGE AND CAPACITY.

WAES TAKES THE CAREFUL HANDLING OF PERSONAL DATA AND DATA PROTECTION WHEN PROVIDING ITS SERVICES VERY SERIOUSLY AND WE COMPLY WITH THE APPLICABLE LAWS AND REGULATIONS. WAES IS RESPONSIBLE FOR PROCESSING PERSONAL DATA, AS DESCRIBED IN THIS PRIVACY STATEMENT. THIS PRIVACY STATEMENT APPLIES TO CURRENT AND FUTURE CANDIDATES, EMPLOYEES, REPRESENTATIVES OF CORPORATE CLIENTS, AND USERS OF THE WAES WEBSITES. THIS PRIVACY STATEMENT EXPLAINS WHAT PERSONAL DATA IS, WHICH DATA WAES PROCESSES, FOR WHAT PURPOSE, AND THE WAY IN WHICH THIS IS DONE. IT ALSO EXPLAINS YOUR RIGHTS AS THE DATA SUBJECT AND HOW THESE CAN BE EXERCISED.

WHAT IS PERSONAL DATA?

PERSONAL DATA MEANS ALL INFORMATION ABOUT AN IDENTIFIED OR IDENTIFIABLE NATURAL PERSON, SUCH AS CONTACT DETAILS, CURRICULA VITAE ('CV'), AND ONLINE IDENTIFIERS. SENSITIVE PERSONAL DATA INCLUDE, FOR EXAMPLE, DATA ON RACIAL OR ETHNIC ORIGIN, RELIGIOUS OR PHILOSOPHICAL BELIEFS, TRADE UNION MEMBERSHIP, POLITICAL AFFILIATION, SEXUAL ORIENTATION, INFORMATION CONCERNING THE STATE OF HEALTH, CRIMINAL RECORD, OR SEXUAL BEHAVIOUR.

WHICH PERSONAL DATA DOES WAES PROCESS AND FOR WHAT PURPOSE?

WE PROCESS PERSONAL DATA WHEN SEARCHING FOR CANDIDATES AND WITHIN THE CONTEXT OF CONCLUDING EMPLOYMENT AGREEMENTS AND OTHER AGREEMENTS. WAES MAY BE LEGALLY OBLIGED TO PROCESS CERTAIN PERSONAL DATA OR WE PROCESS PERSONAL DATA BASED ON EITHER A LEGITIMATE INTEREST OR THE LEGITIMATE INTEREST OF ANOTHER PARTY, SUCH AS A CLIENT.

WE DO NOT PROCESS SENSITIVE PERSONAL DATA UNLESS THIS IS NECESSARY AND IF THERE IS A LEGAL BASIS FOR WAES TO DO SO.

WHAT RIGHTS DO DATA SUBJECTS HAVE?

WAES RESPECTS THE RIGHTS OF DATA SUBJECTS WITH REGARD TO THEIR PERSONAL DATA. SOME RIGHTS CAN BE EXERCISED AT ALL TIMES; OTHER RIGHTS CAN BE EXERCISED UNDER CERTAIN CONDITIONS ONLY. FOR EXAMPLE, WE CANNOT GRANT THE REQUEST OF A DATA SUBJECT TO DELETE ITS PERSONAL DATA IF THERE IS A LEGAL OBLIGATION TO RETAIN THAT PERSONAL DATA FOR A CERTAIN PERIOD OF TIME.

DATA SUBJECTS CAN EXERCISE THE FOLLOWING RIGHTS:

- **RIGHT OF ACCESS TO PERSONAL DATA:**
- **RIGHT OF CORRECTION OF PERSONAL DATA:**
- **RIGHT TO DELETION OF PERSONAL DATA:**
- **RIGHT TO RESTRICTIONS ON PROCESSING OF PERSONAL DATA:**
- **RIGHT TO TRANSFER OF OWN PERSONAL DATA.**

THE AFOREMENTIONED RIGHTS CAN ONLY BE EXERCISED IN RESPECT OF THE PERSONAL DATA OF THE DATA SUBJECT AND ARE, IN SOME CASES, SUBJECT TO THE BASIS ON WHICH THEY WERE COLLECTED. DATA SUBJECTS ARE NOT ALLOWED TO EXERCISE THESE RIGHTS IN RESPECT OF THE PERSONAL DATA OF OTHERS. WAES MAY REQUEST DATA SUBJECTS TO PROVIDE ADDITIONAL IDENTIFICATION IN THIS REGARD.

DATA SUBJECTS CAN CONTACT WAES'S PRIVACY OFFICER BY SENDING AN E-MAIL TO PRIVACY@WAES.NL OR BY CALLING ON +31 (0)40 30 32 150.

WHEN DOES WAES SHARE PERSONAL DATA?

SHARING WITHIN WAES

WE ONLY SHARE PERSONAL DATA WITHIN THE WAES ORGANISATION WITH EMPLOYEES AUTHORISED TO ACCESS THIS DATA. ALL EMPLOYEES ARE SUBJECT TO CONFIDENTIALITY.

SHARING WITH CLIENTS

WAES SHARES THE PERSONAL DATA OF CANDIDATES AND EMPLOYEES WITH CLIENTS, WHEN PROPOSING CANDIDATES AND EMPLOYEES TO CLIENTS OR POTENTIAL CLIENTS. WE USE A WAES CV COMPILED BY WAES EMPLOYEES BASED ON JOB APPLICATION DATA OF DATA SUBJECTS.

SHARING WITH PROCESSORS

WE USE PROCESSORS THAT PROCESS PERSONAL DATA ON BEHALF OF WAES. WAES ENTERS INTO DATA PROCESSING AGREEMENTS WITH ALL PROCESSORS OF PERSONAL DATA TO ENSURE THAT THIS PROCEEDS AS YOU WOULD EXPECT FROM US. WE HAVE MADE AGREEMENTS ABOUT THIS IN ADVANCE WITH THE PROCESSORS AND WILL REGULARLY MONITOR COMPLIANCE.

SHARING WITH OTHER RESPONSIBLE PARTIES

WAES WORKS WITH EXTERNAL PARTIES THAT OFFER SERVICES WHEREBY PERSONAL DATA CAN BE EXCHANGED. THESE ARE, FOR EXAMPLE, PARTIES CARRYING OUT SCREENING, PROVIDING TRAINING, OR BOOKING FLIGHTS AND/OR HOTELS. WE MAKE AGREEMENTS WITH THESE PARTIES WITH REGARD TO THE CAREFUL HANDLING OF PERSONAL DATA.

WAES ONLY DISCLOSES PERSONAL DATA AT THE REQUEST OF THE POLICE AND THE AUTHORITIES IF THERE IS A LEGAL OBLIGATION TO DO SO.

DOES WAES TRANSFER PERSONAL DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA (EEA)?

IF WAES TRANSFERS PERSONAL DATA TO EXTERNAL PARTIES OUTSIDE THE EEA WHERE A SATISFACTORY LEVEL OF PROTECTION IS ABSENT. WE WILL CONTINUE TO MONITOR THE PROCESSING OF PERSONAL DATA

HOW LONG DOES WAES RETAIN PERSONAL DATA?

WAES DOES NOT RETAIN PERSONAL DATA FOR LONGER THAN IS NECESSARY. IN SOME CASES, WAES IS OBLIGED TO RETAIN PERSONAL DATA FOR A LONGER PERIOD OF TIME, FOR EXAMPLE BECAUSE OF LEGAL OR TAX OBLIGATIONS. AFTER EXPIRATION OF THE RETENTION PERIOD, OR FOLLOWING SUCCESSFUL DELETION REQUESTS FROM DATA SUBJECTS, WE DELETE THE PERSONAL DATA FROM OUR SYSTEMS.

WAES APPLIES THE FOLLOWING RETENTION PERIODS FOR THE SITUATIONS LISTED BELOW:

- RECRUITMENT VIA EXTERNAL SOURCES: WE WILL CONTACT YOU WITHIN 30 DAYS AFTER YOU HAVE BEEN FOUND BY WAES TO EXPRESS OUR INTEREST:**
- PERSONAL DATA OF CANDIDATES WHO DO NOT CURRENTLY WORK FOR AND HAVE NOT WORKED FOR WAES IN THE PAST BUT WHO HAVE EXPRESSED THEIR INTEREST IN WAES: TWO YEARS AFTER THE ENTRY DATE OF THE PERSONAL DATA IN WAES'S ADMINISTRATION.**

HOW DOES WAES PROTECT PERSONAL DATA?

WAES TAKES APPROPRIATE TECHNICAL AND ORGANISATIONAL MEASURES TO PROTECT THE PRIVACY OF THE DATA SUBJECTS AND THE CONFIDENTIALITY OF THEIR PERSONAL DATA.

OUR INFRASTRUCTURE IS CONSTANTLY MONITORED BY AN BY US SELECTED ICT PARTNER. THREATS OR ATTACKS ARE BEING DETECTED AT AN EARLY STAGE AND ACTION WILL THEN BE TAKEN. WAES HAS POLICIES AND PROCEDURES IN PLACE FOR THE TIMELY REPORTING OF DATA BREACHES. IN ADDITION, OUR INFRASTRUCTURE IS SCANNED FOR VIRUSES, MALICIOUS SOFTWARE, AND BREAK-IN ATTEMPTS.

WE HAVE ALSO SAFEGUARDED OUR SYSTEMS TO ENSURE THAT NOT EVERYONE WITHIN THE ORGANISATION HAS ACCESS TO PERSONAL DATA. ACCESS TO YOUR PERSONAL DATA IS RESTRICTED TO WAES EMPLOYEES FOR WHOM THE PROCESSING OF PERSONAL DATA IS NECESSARY IN THE PERFORMANCE OF THEIR DUTIES.

YOU CAN CONTRIBUTE TO THE PROTECTION OF YOUR PERSONAL DATA BY, FOR EXAMPLE, BEING CAREFUL WHEN DISCLOSING PERSONAL DATA WHEN YOU RESPOND TO JOBS AND MESSAGES POSTED ON SOCIAL MEDIA BY WAES. THE INFORMATION THAT IS POSTED THERE MAY BE PUBLIC.

WHAT ARE COOKIES AND OTHER SIMILAR TECHNICAL DATA?

A COOKIE IS A SMALL FILE THAT IS STORED ON THE DATA SUBJECT'S COMPUTER. THESE COOKIES CAN BE RECOGNISED DURING SUBSEQUENT VISITS TO THE WEBSITE.

APART FROM COOKIES, WE USE OTHER TECHNICAL DATA ON OUR WEBSITES, SUCH AS WEB STATISTICS TO REGISTER THE USE OF OUR WEBSITES AND VISITOR'S BEHAVIOUR. THIS HELPS WAES TO OPTIMISE ITS SERVICES.

HOW TO CONTACT WAES

IF YOU HAVE ANY QUESTIONS ABOUT THIS PRIVACY STATEMENT, PLEASE CONTACT OUR OFFICE IN EINDHOVEN, THE NETHERLANDS, USING THE FOLLOWING CONTACT DETAILS:

**WAES
ZWAANSTRAAT 31N
5651 CA EINDHOVEN
THE NETHERLANDS
+31 (0)40 30 32 150**

THE WAES PRIVACY OFFICER CAN BE CONTACTED VIA E-MAIL AT PRIVACY@WAES.NL OR BY TELEPHONE ON +31 (0)40 30 32 150.

**NOTIFICATION OF A SUSPECTED OR CONFIRMED SECURITY BREACH
IN THE EVENT OF A SUSPECTED OR CONFIRMED BREACH OF PERSONAL DATA SECURITY.
DATA SUBJECTS ARE REQUESTED TO INFORM WAES AS SOON AS POSSIBLE
VIA PRIVACY@WAES.NL STATING 'DATA BREACH' IN THE EMAIL'S SUBJECT LINE.**

AMENDMENTS TO THE PRIVACY STATEMENT

WAES IS ENTITLED TO AMEND THIS PRIVACY STATEMENT. AMENDMENTS WILL BE PUBLISHED ON THE WEBSITE.

OVERVIEW OF THE PURPOSES OF PROCESSING AND THE TYPES OF PERSONAL DATA PROCESSED

USING WAES'S WEBSITE(S)

PURPOSE OF PROCESSING:

- **TO RESPOND ONLINE TO VACANCIES;**
- **TO IMPROVE THE SERVICES THAT WAES PROVIDES.**

PERSONAL DATA PROCESSED:

- **RESPONDING ONLINE: FIRST NAME. SURNAME. E-MAIL ADDRESS;**
- **IMPROVING THE SERVICES: COOKIES AND SIMILAR TECHNICAL DATA THAT ARE STRICTLY NECESSARY AND/OR VOLUNTARILY AGREED TO.**

IN THE CONTEXT OF RECRUITMENT

PURPOSE OF PROCESSING:

- **TO SEARCH FOR AND APPROACH POTENTIAL CANDIDATES AT WAES'S INITIATIVE.**
- **PERSONAL DATA PROCESSED:**
- **SEARCHING FOR AND APPROACHING: CONTACT DETAILS. LINK TO SOCIAL MEDIA PROFILE. AND MESSAGES THAT ARE SENT TO WAES.**

VIA SOCIAL MEDIA AND JOB BOARDS

PURPOSE OF PROCESSING:

- **TO GENERATE INTEREST IN WAES;**
- **TO ENABLE DATA SUBJECTS TO RESPOND ONLINE;**
- **TO RESPOND TO QUESTIONS FROM DATA SUBJECTS.**

PERSONAL DATA PROCESSED:

- **ONLINE RESPONSE: CONTACT DETAILS. VACANCIES. AND COMMENTS OF THE DATA SUBJECTS;**

- **WAES'S RESPONSE TO QUESTIONS FROM DATA SUBJECTS: CONTACT DETAILS AND VACANCY/COMMENTS FROM DATA SUBJECTS.**
- **PERSONAL DATA VOLUNTARILY PROVIDED BY DATA SUBJECTS ON WAES'S SOCIAL MEDIA. SUCH AS RESPONSES TO MESSAGES/ADVERTISEMENTS AND PRIVATE MESSAGES VIA THE SOCIAL MEDIA PLATFORM.**

APPLYING AT WAES

PURPOSE OF PROCESSING:

- **TO ASSESS THE SUITABILITY AND AVAILABILITY OF A CANDIDATE FOR EMPLOYMENT AT WAES:**
- **TO CREATE AND SHARE A DATA SUBJECT'S CV WITH CLIENTS ON THE BASIS OF THE WAES CV TEMPLATE:**
- **TO SELECT CANDIDATES FOR VACANCIES AVAILABLE WITH WAES AND ITS CLIENTS:**
- **TO CREATE DIGITAL FILES OF DATA SUBJECTS:**
- **TO BE ABLE TO CARRY OUT ASSESSMENTS.**

PERSONAL DATA PROCESSED:

- **PERSONAL DATA: FIRST NAME, SURNAME, DATE OF BIRTH, GENDER, NATIONALITY:**
- **CONTACT DETAILS: RESIDENTIAL ADDRESS, E-MAIL ADDRESS, TELEPHONE NUMBER:**
- **EDUCATION: EDUCATION, TRAINING COURSES, DIPLOMAS, DEGREES, CERTIFICATES:**
- **SKILLS: EXPERTISE, LANGUAGE SKILLS:**
- **WORK HISTORY: PREVIOUS AND CURRENT EMPLOYERS, FUNCTIONS, AND EXPERIENCE:**
- **APPLICATION DETAILS: CV, COVER LETTER:**
- **NOTES FROM WAES EMPLOYEES:**
- **ASSESSMENT OF THE SUITABILITY AND AVAILABILITY: EDUCATION, EXPERIENCE, FUNCTION AND BUDGET-RELATED CRITERIA:**
- **FOR CREATING AND SHARING A DATA SUBJECT'S CV WITH CLIENTS ON THE BASIS OF THE WAES CV TEMPLATE: FIRST NAME, SURNAME, DATE OF BIRTH, PLACE OF RESIDENCE, NATIONALITY, PROFILE/SUBSTANTIATION, RELEVANT TRAINING AND COURSES, RELEVANT WORK EXPERIENCE, LANGUAGES, AND SOFTWARE KNOWLEDGE:**
- **SELECTION OF CANDIDATES: EDUCATION, EXPERIENCE, SKILLS, REFERENCES, FUNCTION-RELATED CRITERIA:**
- **DIGITAL FILE: CVS AND OTHER DOCUMENTS, SUCH AS INTERVIEW AND MEETING NOTES, NOTES, ETC.**

IN THE CONTEXT OF EMPLOYMENT AGREEMENTS OR CONTRACTS FOR SERVICES

PURPOSE OF PROCESSING:

- **TO REGISTER PERSONAL DATA REQUIRED FOR COMPLIANCE WITH LAWS AND REGULATIONS:**
- **TO IMPLEMENT EMPLOYMENT CONTRACTS.**

PERSONAL DATA PROCESSED:

- **PERSONNEL FILE: PERSONAL DATA THAT NEEDS TO BE PROCESSED ON THE BASIS OF, FOR EXAMPLE, LABOUR LEGISLATION AND TAX AND SOCIAL SECURITY LEGISLATION, SUCH AS A COPY OF IDENTITY DOCUMENTS OR PASSPORTS, VISAS, WORK PERMITS, CITIZEN SERVICE NUMBERS AND DOCUMENTS NECESSARY FOR ADMINISTRATIVE PURPOSES SUCH AS CONTACT DETAILS:**
- **SUPPLEMENTARY DOCUMENTS: CERTIFICATES OF GOOD CONDUCT, NON-DISCLOSURE AGREEMENTS, CERTIFICATIONS:**
- **FINANCIAL INFORMATION: SALARY, BANK ACCOUNT NUMBERS:**

- **FINANCIAL DATA IN CASE OF AN EXTERNAL SERVICE PROVIDER: COMPANY DATA, RATES, AND, IN CASE OF SELF-EMPLOYED WORKERS WITHOUT EMPLOYEES, DATA NECESSARY FOR ASSESSING THE EMPLOYMENT RELATIONSHIP IN THE CONTEXT OF THE ASSESSMENT OF EMPLOYMENT RELATIONSHIPS (DEREGULATION) ACT, SUCH AS NUMBER OF ASSIGNMENTS, TYPES OF ASSIGNMENTS, AND DURATION OF THE ASSIGNMENT:**
- **OTHER INFORMATION RELATED TO PREPARING THE PERSONNEL, SALARY, AND ABSENTEEISM RECORDS, SUCH AS REGISTRATION NUMBER OF THE COMPANY CAR, LAPTOP (IF PROVIDED BY THE COMPANY), MOBILE PHONE (IF PROVIDED BY THE COMPANY), PARTNER'S AND/OR CHILDREN'S PERSONAL DATA FOR PENSION ADMINISTRATION:**
- **WORKING ABROAD: PERSONAL DATA NECESSARY FOR ORGANISING WORK PERMITS, VISAS, TAXES, AND HOUSING.**

WITH REGARD TO OTHER INTERNAL PURPOSES

PURPOSE OF PROCESSING:

- **TO ENSURE OPERATIONAL SAFETY:**
- **TO GENERATE MANAGEMENT INFORMATION:**
- **TO OBTAIN AND MAINTAIN CERTIFICATIONS:**
- **TO APPLY FOR GRANTS, PREMIUM DISCOUNTS, ETC.:**
- **TO ENABLE AUDITS TO TAKE PLACE.**

PERSONAL DATA PROCESSED:

- **WITH RESPECT TO THE PROCESSING OF PERSONAL DATA FOR THESE OTHER INTERNAL PURPOSES OF WAES, THE BASIC PRINCIPLE IS THAT THE USE OF DIRECTLY IDENTIFIABLE INFORMATION IS LIMITED TO THE MINIMUM AND THAT DATA IS ANONYMISED WHERE POSSIBLE.**

TO INFORM CLIENTS AND POTENTIAL CLIENTS ABOUT WAES'S SERVICES AND TO BE ABLE TO SUBMIT OFFERS

PURPOSE OF PROCESSING:

- **TO ACQUIRE NEW CLIENTS:**
- **TO GAIN INSIGHT INTO THE DEMAND FOR LABOUR IN THE MARKET:**
- **TO BE ABLE TO OFFER SERVICES TO NEW CLIENTS.**

PERSONAL DATA PROCESSED:

- **ACQUISITION: CONTACT DETAILS OF REPRESENTATIVES OF CLIENTS:**
- **INSIGHT INTO THE ASSIGNMENT: DESCRIPTION OF THE COMPANY AND ITS ACTIVITIES, CULTURE, CONTENT OF THE ASSIGNMENT, AND DESIRED PROFILES:**
- **OFFERING SERVICES: CONTACT DETAILS OF REPRESENTATIVES OF POTENTIAL CLIENTS, INFORMATION ABOUT THE SECTOR IN WHICH THE CLIENT OPERATES:**
- **OFFERING/PROVIDING INFORMATION ABOUT SERVICES: CONTACT DETAILS OF REPRESENTATIVES OF POTENTIAL NEW CLIENTS, INFORMATION ABOUT THE SECTOR IN WHICH THESE CLIENTS OPERATE.**

ESTABLISHING AND MAINTAINING BUSINESS RELATIONSHIPS WITH SUPPLIERS

PURPOSE OF PROCESSING:

- **TO CONCLUDE AND IMPLEMENT AGREEMENTS AND/OR TO HAVE THEM IMPLEMENTED:**
- **COMMUNICATION.**

PERSONAL DATA PROCESSED:

- **CONCLUDING AND IMPLEMENTING AGREEMENTS: CONTACT DETAILS: NAME. E-MAIL ADDRESS. AND TELEPHONE NUMBER:**
- **COMMUNICATION: CONTACT DETAILS: NAME. E-MAIL ADDRESS. TELEPHONE NUMBER.**