
DLL Personnel Privacy Notice

Notice description

This DLL Privacy Notice outlines the standards by which DLL will collect and process Personal Data relating to its personnel.

For questions related to this document, please contact the Data Protection Officer of DLL via: privacyoffice@dllgroup.com

25 May 2018

Contents

1. Introduction	3
2. Purpose and legal basis for Processing Personal Data	4
3. Which Personal Data are processed by DLL?	5
4. How does DLL collect your Personal Data?	5
5. How long will DLL store Personal Data?	5
6. Does DLL transfer your Personal Data to third parties and to other countries outside the EU?	6
a. Within Rabobank/DLL Group	6
b. Outside Rabobank/DLL Group	6
7. How will DLL secure your Personal Data?	6
8. Which rights can you exercise?	7
a. Right to access and rectification	7
b. Right to erasure (right to be forgotten)	7
c. Right to restrict Personal Data	7
d. Right to data portability	7
e. Right to object	7
f. Right to withdraw consent	7
9. How to contact DLL in case of a request, question or complaint	7
10. Can this Privacy Notice be updated by DLL?	7

1. Introduction

De Lage Landen International B.V. ('DLL') processes Personal Data of its Personnel (also referred to as 'you') in accordance with applicable data privacy laws and as stipulated in this Privacy Notice ('Notice'). With this Notice DLL wants to inform you in a transparent manner on the most important standards by which DLL processes Personal Data as employer.

De Lage Landen International B.V. is a private limited liability company established under Dutch law
Address: Vestdijk 51, 5611 CA Eindhoven, the Netherlands
Postal address: P.O. Box 652, 5600 AR Eindhoven, the Netherlands
Telephone: + 31 40 233 9911
Commercial registration number at the Dutch Chamber of Commerce: 17056223
VAT number: NL007091400B01
Supervisory Authorities: European Central Bank, Dutch Central Bank and the Dutch Authority for the Financial Markets

Questions about this Notice or the Processing of Personal Data in general, may be directed to the Data Protection Officer of DLL via privacyoffice@dllgroup.com. This DPO has been appointed for De Lage Landen International B.V. and its affiliates.

What does DLL mean by Personal Data Processing?

This Notice concerns the Processing of Personal Data of personnel. What do these words mean?

– Personal Data

Information that says something directly or indirectly about you is referred to as Personal Data. Examples include your name and address, and also information such as your health, pension and income

– Processing

Processing means anything that can be done with Personal Data. This includes the collection, storage, use, transfer and removal of data

– Personnel

Any current, former and prospective employees, directors, consultants, temporary staff, individual contractors, interns, secondees and other personnel.

2. Purpose and legal basis for Processing Personal Data

DLL collects and processes Personal Data in order to perform its contractual role as employer, including administrative and managerial tasks in connection with employment, and to comply with applicable laws. Prior to the Processing of Personal Data, DLL will define the purpose of the Processing. DLL will not process Personal Data in a manner which is not compatible with those purposes. The purposes and legal bases for which we may Process your Personal Data are:

Processing purpose	Legal basis for Processing
Management of employment contracts (onboarding, change of contract, change of contractor, termination of a contract)	- The Processing is necessary in connection with the contract that you (as a member) have with us or to take steps prior to entering into a contract with us.
(Pre-)screening (screening on integrity and capability). This screening may involve regulators for specific functions.	- The Processing is necessary for compliance with a legal obligation . - If your function invokes no legal obligation for screening, DLL has a legitimate interest to ensure DLL engages members that are trustworthy and have no criminal history.
Payroll functions (including mutations check and control of internal and external input/output)	- The Processing is necessary in connection with the contract that you (as a member) have with us. - As an employer DLL has a legal obligation to provide you with a payslip.
Travel management (e.g. lease car), benefit plan management and expense reporting	- The Processing is necessary in connection with the contract that you (as a member) have with us or to take steps prior to entering into a contract with us.
Sick leave management	- The Processing is necessary for compliance with a legal obligation .
Performance management	- The Processing is necessary in connection with the contract that you (as a member) have with us or to take steps prior to entering into a contract with us.
Pension management and administration	- The Processing is necessary in connection with the contract that you (as a member) enter into with us or to take steps prior to entering into a contract with us. - The Processing can also be necessary for compliance with a legal obligation .
Training and learning services (e.g. requests for training, mandatory e-learnings)	- The Processing is in some cases necessary for compliance with a legal obligation . This relates to mandatory training. - In all other cases DLL has a legitimate interest to keep her members qualified with training and learning services.
Recruitment (members, contractors, talent brokerage)	- We have a legitimate interest in carrying out the Processing for the purpose of recruiting personnel.
Management reporting and analysis	- We have a legitimate interest in carrying out the Processing for the purpose of performing our employer duties.
Security and maintenance of DLL's system and network environment	- We have a legitimate interest in carrying out the Processing for the purpose of managing and operating our systems and ensuring the security and access management of those system.
Health and safety	- We have a legitimate interest in carrying out the Processing for the purpose of providing a safe and secure environment at our premises. - The Processing may also be necessary to protect your vital interest .
Security (physical security of our premises and electronic security)	- We have a legitimate interest in carrying out the Processing for the purpose of ensuring the physical and electronic security of our business, premises and assets.
Internal and external audit & controls	- We have a legitimate interest in carrying out the Processing for the purpose of detecting, and protecting against, breaches of our policies, fraud and (other) applicable laws.
Legal proceedings	- We have a legitimate interest in carrying out the Processing for the purpose of establishing, exercising or defending our legal rights.

In case DLL has indicated it has a legitimate interest for processing, DLL takes into regard whether such interest is overridden by your interest or fundamental rights and freedom.

3. Which Personal Data are processed by DLL?

The Personal Data which are being processed by DLL can be divided in different categories:

Categories of Personal Data	Examples
Personal details	Name(s), preferred name(s), gender, place of birth, nationality, date of birth/age, marital status, photographs, passport, national ID, Social Security number, other government issued number(s) (tax identification number(s), Green Card number(s), driving license number(s)), Images of passports, driving licenses, and signatures, authentication data (passwords, challenge/response questions and answers).
Family details	Name(s) and contact details of partners, children or family members.
Contact details	Address, telephone number, email address and social media profile details.
Employment details	Screening document, In Case of Emergency (ICE) contact, job title, office location, business activities, names of current and former employers, hourly rate, work address, work telephone number, work email address and work-related social media profile details.
Education history	Details of your academic and professional qualifications, which include degrees, diplomas, employment history, CVs, language skills etc.
Financial details	Salary, billing address, bank account numbers, credit card numbers, cardholder or accountholder name and details, instruction records, transaction details, payroll data and counterparty details.
Views and opinions	Any views and opinions that you choose to send to us or publish about us (including on social media platforms).
Electronic Identifying Data	IP addresses, cookies, activity logs, online identifiers, unique device identifiers and geolocation data.
Health Data	First day of sick leave, hours of sick leave, amount of sick registrations, disabilities, date meeting company doctor, maternity leave.
Performance management Data	Rating, personnel evaluations, performance management assessments, promotions, bonus/merit increase information.

4. How does DLL collect your Personal Data?

We collect Personal Data about you from a variety of sources:

- DLL receives your Personal Data if you have provided this to DLL, for example when you contact us via e-mail or telephone, or by any other means, in order to enter into an (employee) contract.
- DLL collects your Personal Data in the ordinary course of our relationship with you, for example in the course of managing your contract and performance.
- DLL collects Personal Data that you manifestly choose to make public, including via social media, for example we collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible.
- DLL can receive your Personal Data from third parties, for example from your previous employer or from law enforcement authorities. As DLL is part of the Rabobank group, DLL can also receive your Personal Data from companies within the Rabobank group (see also paragraph 6 (a) of this Notice).
- DLL collects or obtains Personal Data when you visit any of our websites or use any features or resources available on or through a website or Member App. When you visit a website, your device and browser could automatically disclose certain information, some of

which could constitute Personal Data for example device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting a website and other technical communications information.

- DLL also collects Personal Data by automated means when people are logged on to DLL's systems or network environment or when using its IT resources. Subject to applicable law, this information is used to monitor compliance with DLL's IT policies, if applicable and/or for the maintenance and security of DLL's information systems network.

5. How long will DLL store Personal Data?

We do not store your Personal Data longer than we need it for the purposes for which we have collected it, or for the purposes for which we re-use the Personal Data. In the Netherlands this will be in most cases 7 years after the end of the agreement or your relationship with DLL. Sometimes we use different storage periods.

If we no longer need the Personal Data for the purposes described in paragraph 2, we can still store the data for archiving, legal proceedings or for historical or scientific research or statistical purposes.

6. Does DLL transfer your Personal Data to third parties and to other countries outside the EU?

a. Within Rabobank/DLL Group

As DLL is part of the Rabobank Group, your Personal Data can be exchanged between parts of the Rabobank Group, most likely Coöperatieve Rabobank U.A., for legitimate business purposes.

We must, however, comply with the rules that we have agreed within the Rabobank Group, and as stated in the Binding Corporate Rules and the Rabobank Privacy Code Employee data. This Rabobank Privacy Code Employee Data describes the requirements which all these parts of DLL Group must meet and guarantee an appropriate level of protection of Personal Data.

DLL can also be located in countries outside of the European Union that have less strict privacy rules. If we share your Personal Data with parts of DLL we will only do so in accordance with the Rabobank Privacy Code.

b. Outside Rabobank/DLL Group

Your Personal Data is also transferred to third parties outside the Rabobank Group if we are legally obliged to do so, because we have to make an agreement with you or because we use a third party.

We pass on your Personal Data to third parties if we are obliged to do so. For example to (European) supervisory authorities, such as the tax authorities.

We also provide details if necessary to meet the (employment) agreements with you.

Moreover, we may transfer your Personal Data to third parties that we need in the context of our services. For example, accountants, auditors, financial advisors and lawyers.

We could also disclose your Personal Data to any relevant party, claimant, complainant, enquirer, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights in accordance with applicable law. Besides that, we could also disclose your Personal Data to any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security in accordance with applicable law.

Sometimes we engage third parties/business partners who process Personal Data in our assignment. For example, payroll providers, payment services providers, health, insurance and benefit providers or travel agencies. Parties that store data for us. These parties must first be deemed sufficiently reliable by us. We can only engage third parties if this fits the purposes for which we have processed your Personal Data. In addition, this third party can only receive our order if he makes certain agreements with us and has demonstrably taken appropriate security measures and guarantees confidentiality. Your Personal Data may also be exchanged with third parties that we engage in our business operations or the execution of our services.

Lastly we could also disclose your Personal Data to any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

If we transfer your Personal Data to third parties outside the European Union, we take extra measures to protect your Personal Data. The same rules do not apply in all countries outside the European Union to protect your Personal Data as required within Europe. Do we use third parties outside the EU? And does the country where this party is located does not offer sufficient protection in the Processing of Personal Data according to the European Commission? In that case, we will only transfer Personal Data if there are other appropriate safeguards, such as contractual agreements approved by the European Commission or on the basis of the 'Privacy Shield' (United States).

7. How will DLL secure your Personal Data?

DLL is committed to making sure your Personal Data is secure. To prevent unauthorized access or disclosure, DLL has technical and organizational measures to safeguard and secure your Personal Data. All DLL personnel and third parties DLL engages to process your Personal Data are obliged to respect the confidentiality of your Personal Data and they have a duty of confidentiality.

8. Which rights can you exercise?

a. Right to access and rectification

You can ask us to access your Personal Data, after which we can grant you access to your Personal Data processed by us. Should you believe that your Personal Data has not been processed correctly or is incomplete, then you can ask us to rectify or supplement your Personal Data (rectification).

b. Right to erasure (right to be forgotten)

You can ask us to erase your Personal Data as recorded by us.

c. Right to restrict Personal Data

You can ask us to limit the Personal Data processed by us.

d. Right to data portability

You have the right to ask us to receive the Personal Data that you provided to us in connection with a contract with us or that was provided to DLL with your permission, in a structured and machine readable format or to transfer this Personal Data to a third party. Should you ask us to transfer Personal Data directly to a third party, then this can only be done if it is technically possible.

e. Right to object

You have the right to object if we process your Personal Data. If you object to Processing, we will determine whether your Personal Data can indeed no longer be used for those purposes. We can then decide to cease the Processing of your Personal Data. We will inform you motivated about our decision.

f. Right to withdraw consent

If you have given your consent to us for specific Processing of your Personal Data, you can always withdraw your consent. We are then no longer allowed to process your Personal Data.

The requests for access, rectification, erasure, restriction, data portability, objection or a request to withdraw consent, can be send to the Data Protection Officer. For the contact details please see paragraph 9 of this Notice.

DLL will respond within one month after DLL has received your request. In specific cases, DLL is able to extend this period to 2 months. In order to process your request DLL will request you to provide identification, for example in case of a request for access. DLL can also request you to further specify your request.

9. How to contact DLL in case of a request, question or compliant

For requests, questions or complaints with regard to the Processing of Personal Data by DLL, you can contact the Data Protection Officer of DLL via: privacyoffice@dllgroup.com

You can also contact the 'Autoriteit Persoonsgegevens' if you have a complaint about the Processing of Personal Data by DLL:

Postal address: Autoriteit Persoonsgegevens
P.O. Box 93374
The Hague
The Netherlands
Telephone number: +31 70 888 85 00

10. Can this Privacy Notice be updated by DLL?

This Notice can be updated from time to time. For example in case of additional legal requirements or if Personal Data is being processed by DLL for new purposes. If those changes are important for you, we will inform you accordingly. Please note that you can always find the latest version of this Notice on TrueBlue.

