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# Privacy Statement for Job Applicants

## Statement description

As part of any recruitment process, DLL collects and processes personal data of job applicants. The privacy and the protection of personal data is important to DLL. This Privacy Statement outlines in a transparent manner how we collect and use personal data and meet our data protection obligations.

For questions related to this Statement or the processing of personal data in general, please contact us via: [indialegal@dllgroup.com](mailto:indialegal@dllgroup.com)

[This Privacy Statement was created on December 31, 2020]

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## 1 When does this Privacy Statement apply?

This Privacy Statement is applicable to processing of personal data of any individual that applies for a job or position at De Lage Landen Financial Services India Private Limited. These can be prospective employees, external (supervisory) directors, temporary staff, interns and other individuals applying for a position (also referred to as 'you' or 'your').

This Privacy Statement does not apply to our (former) employees, customers, vendors, dealers, suppliers and other individuals. For these groups we have separate Privacy Statements in place.

## 2 Who is responsible for the processing of your personal data?

De Lage Landen Financial Services India Private Limited ('DLL', 'we' or 'us') processes your personal data in accordance with applicable privacy and data protection laws and as stipulated in this Privacy Statement (also further referred to as 'Statement'). With this Statement we want to inform you in a transparent manner on the most important standard activities and legal bases on which we process your personal data.

Contact details:

De Lage Landen Financial Services India Private Limited is a private limited liability company established under Indian law

Address: 20/F, Tower A, Peninsula Business Park, Senapati Bapat Marg, Lower Parel, Mumbai 400 013

Postal address: Same as above

Telephone: +91 22 2482 3199

Corporate Identity Number: U65900MH2011FTC221903

GST (VAT) number: 27AADCD9948E1ZD

Supervisory Authority: Reserve Bank of India

We are an indirectly wholly owned subsidiary of De Lage Landen International B.V., which is a wholly owned subsidiary of Coöperatieve Rabobank U.A. ('Rabobank' and together with its subsidiaries, the ('Group')). Data may be shared within Rabobank Group to the extent that is permitted by law. When sharing data within Rabobank Group, we comply with the rules that we have agreed within Rabobank Group, the [Rabobank Privacy Code for Employee Data](#), which serve as the Binding Corporate Rules of the Group.

Questions about this Statement or the processing of personal data in general can be directed to our local compliance officer at [indialegal@dllgroup.com](mailto:indialegal@dllgroup.com).

A DLL Group Data Protection Officer ("DLL Group DPO") has been appointed for De Lage Landen International B.V. and its subsidiaries. The DLL Group DPO can be contacted by email via [privacyoffice@dllgroup.com](mailto:privacyoffice@dllgroup.com).

## 3 What personal data do we process?

'Personal data' means any information directly or indirectly relating to an individual or any information that can be used to identify an individual.

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Personal data is 'processed' when any activity or set of activities is performed on the personal data. This includes the collection, storage, access, use, transfer, disclosure and removal of personal data.

When you apply for a job or position at DLL, we process the following personal data:

- Your name, address and contact details, including e-mail address and (mobile) telephone number;
- Your gender, date and place of birth;
- Details of your competences, skills, experience and education e.g. your curriculum vitae (CV), employment history, educational details and qualifications, third-party references;
- Your preferences, e.g. preferred country of employment, areas of interest;
- Data generated by your participation in behavior/cognitive assessments. You will receive more information about the nature of such assessments before you participate in any of them;
- Information related to pre-employment screening on integrity and capability, depending on the position you are applying for;
- Your nationality and, if applicable, your entitlement to work in India;
- Your photograph and video recordings (Closed Circuit Television ('CCTV') footage) when you visit our office;
- Information on your social networking and instant messaging accounts (LinkedIn, XING);
- Through cookies, or similar technologies, we may collect, IP address, device type, browser type, language settings, the links you click while using our sites and services, dates and times of connecting a website and other technical communications information.

## 4 Do we also process special categories of personal data?

Special categories of personal data are considered to be more sensitive. This can be confidential information regarding, for example, a person's health condition, criminal record or data relating to ethnic or racial origin.

As part of the pre-employment screening process we also check whether you have any criminal history. We consult (directly or via third parties) financial industry incident databases and alert systems in which for example cases of fraud against financial institutions are registered. The purpose of these databases and systems is to protect the interests of financial institutions, our employees and customers. We only process personal data relating to a person's criminal background when assessing whether or not to hire that person.

## 5 How do we collect your personal data?

We collect your personal data in the following ways:

- when you visit our 'Working at DLL Group' website (for further details, see [cookie statement](#))
- if you fill out the application form on our 'Working at DLL Group' website;
- if you send us an application via other means;
- if you choose to turn on the job alert-function on our 'Working at DLL Group' website;
- by searching suitable candidates by means of platforms such as CV databases and professional networking sites;
- via email or telephone;
- during interviews;
- through behavioral/cognitive assessments;

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- by performing a pre-employment screening on integrity and capability;
  - from third parties (e.g. via a reference from your previous employer or an external (recruitment) agency);
  - from affiliates within the Rabobank Group (see Paragraph 8) and;
  - when you visit a DLL office e.g. for an interview via our visitor-registration and if in operation via CCTV.

## 6 For which purposes and on what legal basis do we process your personal data?

When you apply for a job or position at DLL, we will ask you to provide us with personal information about yourself so we can evaluate your job application. If this information is not provided, our ability to consider you as a suitable candidate is limited.

By law, every personal data processing activity must have a legal basis. This is a justifiable reason to process your personal data. For most processing activities through the job application process we rely on 'legitimate interest' as the legal basis. However, in some cases we are under a legal obligation to process your personal data.

Prior to the processing of personal data, we will define the purpose(s) of the processing and will not process personal data in a manner which is not compatible with those purposes. The table below shows the processing purposes, categories of personal data involved and on what legal basis we rely:

**Recruitment, selection, evaluation and appointment of job candidates (temporary and permanent) for the job you have applied for and for subsequent job opportunities.**

**Categories of personal data:**

- Contact information: for example, first and last name(s), address, email address, (mobile) phone number
- (Former) employment information: for example, job title, current employer, employment history, curriculum vitae (CV)
- Education information: for example, details of your professional and/or academic qualifications, which include diplomas, degrees, language skills etc.
- Financial information: for example, salary expectations (optional)
- Social networking and instant managing accounts (LinkedIn, XING) (optional).

**Legal basis:** Legitimate interest. We have a legitimate interest to select and recruit the best suitable candidates for job opportunities within DLL and optimize the quality and diversity of our personnel.

**To send you personalized job-alerts.**

**Categories of personal data:**

- Contact information: for example, first and last name(s), email address.

**Legal basis:** Legitimate interest. We have a legitimate interest to select and recruit the best suitable candidates for job opportunities within DLL and optimize the quality and diversity of our personnel.

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To search for and approach suitable candidates on platforms such as CV databases and professional networking sites. The personal data we process in this respect is limited to the information you made available on these platforms and your personal settings.

**Categories of personal data:**

- Contact information: for example, first and last name(s), email address
- (Former) employment information: for example, job title, current employer, employment history, curriculum vitae (CV)
- Education information: for example, details of your professional and/or academic qualifications, which include diplomas, degrees, language skills etc..

**Legal basis:** Legitimate interest. We have a legitimate interest to select and recruit the best suitable candidates for job opportunities within DLL and optimize the quality and diversity of our personnel.

To perform pre-employment screening on integrity and capability. This screening may involve regulators for specific functions.

**Categories of personal data:**

- Contact information: for example, first and last name(s), address, date of birth, country of birth
- Special category of personal data: Check whether you have a criminal history, ascertain that you have not taken abnormal amounts of debt by reviewing your credit history/credit bureau report(s).

**Legal basis:** The processing is necessary for compliance with the *legal obligation* to guarantee the security and integrity of the financial sector. If your function invokes no legal obligation for screening, we have a *legitimate interest* to ensure we hire personnel that are trustworthy and have no criminal history.

To perform behavior/cognitive assessments.

**Categories of personal data:**

- Contact information: for example, first and last name(s), e-mail address.

You will receive more information about the nature of such assessments before you participate in any of them.

**Legal basis:** Legitimate interest. We have a legitimate interest to assure that the capacity of applicants meets our requirements.

To book accommodation and travel for out of town job applicants.

**Categories of personal data:**

- Contact information: for example, first and last name(s), e-mail address, copy ID-card/passport.

**Legal basis:** Legitimate interest. We have a legitimate interest to accommodate the selection and recruitment of personnel

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**To enter into and process an (employment) contract with you.**

**Categories of personal data:**

- Contact information: for example, first and last name(s), address, Copy ID-card/passport.

**Legal basis:** Entering into, performing and managing a contract.

**To perform surveys.**

**Categories of personal data:**

- Contact information: for example, first and last name(s), e-mail address.

**Legal basis:** Legitimate interest. We have a legitimate interest to acquire information in order to improve our job application process and our approach to applicants.

**To protect the physical security of our business, premises and assets we have CCTV in operation at our offices (when you visit one of our offices for a job interview).**

**Categories of personal data:**

- Footage or images.

**Legal basis:** Legitimate interest. We have a legitimate interest to protect the security of our assets and members that are present in our offices as well as the general security of our office.

**To register visitors when they arrive at our office (when you visit one of our offices for a job interview).**

**Categories of personal data:**

- First and last name(s).

**Legal basis:** Legitimate interest. We have a legitimate interest to have adequate monitoring of all people that are present in our building to safeguard safety and security of our offices, as well as yours.

**To analyze visits to our website with the aim of improving our website.**

**Categories of personal data:**

- Device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting a website and other technical communications information.

**Legal basis:**

- We have a *legitimate interest* to develop and improve our website on an ongoing basis.
- Where needed, we will obtain your *consent* (e.g. for profiling for job searches).

Where we indicated we have a legitimate interest for processing, we take into regard that our legitimate interest does not override your fundamental rights and freedoms.

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Once you have acquired a position at DLL, the collected personal data will be processed by our Human Resources department in the personnel file, in accordance with our Privacy Statement for Members.

## 7 How do we handle and secure your personal data?

Only personnel who require access for the purpose of considering your job application at DLL will process your personal data. All our personnel are bound by a duty of confidentiality.

We are committed to keep your personal data secure. To prevent unauthorized access or disclosure, we have taken technical, physical and organizational measures to safeguard and secure your personal data. These security measures are aimed at preventing your personal data from being used illegitimately or fraudulently. In particular, we use security measures to ensure the confidentiality, integrity, and availability of your data as well as the resilience of the systems and services that process them and the ability to restore data in the event of a data breach. Where possible, we aim to secure your personal data using pseudonymization or encryption measures. In addition, we test, verify and regularly evaluate the effectiveness of our technical and organizational measures in order to ensure continuous improvement in the security of processing personal data.

Generally, we will process your personal data for the purposes for which these were originally collected. Personal data may also be processed for a legitimate business purpose different from the original purpose (secondary purpose), but only if the secondary purpose corresponds to the original purpose. For example, you apply for a position that in the end does not suit you, but when we think you are suitable for another/similar position, we might include you in the procedure for the other/similar position.

## 8 Do we transfer your personal data to other parties and/or to other countries?

### a. Within the Group

We are an indirectly wholly owned subsidiary of De Lage Landen International B.V., who is a wholly owned subsidiary of Coöperatieve Rabobank U.A. ('Rabobank' and together with its subsidiaries, the 'Group').

Your personal data may be shared within the Group for legitimate purposes, when those entities comply with the rules of Rabobank described in the Rabobank Privacy Code for Employee Data. This Rabobank Privacy Code describes the requirements that all Group entities worldwide must meet and guarantee an appropriate level of protection of personal data and serve as the Binding Corporate Rules of the Group.

For instance, the Global Talent Acquisition Team of De Lage Landen International B.V. has access to personal data of job applicants worldwide.

### b. Outside the Group

If we are legally obliged to do so, we transfer your personal data to third parties. For example, to supervisory authorities.

We also engage third parties for processing personal data on our instructions in connection with the purpose for which we collected your personal data. For example, we involve third parties to perform the behavioral/cognitive assessment and pre-employment screening.



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The third parties that support us in providing our recruitment services or store personal data for us must first be deemed sufficiently reliable from a privacy and data protection perspective. We only engage third parties if this fits the purposes for which we process your personal data. In addition, these third parties can only be involved if they enter into proper contracts with us, have implemented appropriate security measures and guarantee that your personal data will remain confidential.

## 9 How long do we store your personal data?

We do not store your personal data longer than we need to for the purposes for which we have collected it. In addition, we take applicable law and regulations into account when your personal data is stored which means that we can use different storage periods. For example, if the supervisory authority requires us to store certain personal data longer or if you have filed a complaint that makes it necessary to keep the underlying personal data for a longer period.

We will delete personal data at an earlier time if you request us to delete your personal data, unless another law prevails. In certain cases, we may use different retention periods. For example, if a supervisory authority requires us to store certain personal data longer, if you have filed a complaint that makes it necessary to keep the underlying personal data for a longer period, or in specific cases for archiving, legal proceedings, or for historical, scientific research or statistical purposes.

## 10 Which rights can you exercise?

### a. Right to access and rectification

You can ask us to access your personal data processed by us. Should you believe that your personal data is incorrect or incomplete, you can ask us to rectify or supplement your personal data.

### b. Right to erasure (right to be forgotten)

You can ask us to erase your personal data as processed by us. If we do not have any legal obligations or legitimate business reasons to retain your personal data, we will execute your request.

### c. Right to restrict personal data

You can ask us to limit the personal data processed by us. We may refuse a restriction request if we have a lawful reason to continue the processing of the personal data (e.g. the exercise of a contract, a legal archiving duty, or the establishment, exercise or defense of legal claims).

### d. Right to data portability

You have the right to ask us to receive the personal data that you provided to us in a structured and machine readable format or to transfer your personal data to a third party. Transfer of personal data directly to a third party 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 about our decisions and motivations.

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f. **Right to withdraw consent**

If you have given your consent to us for specific processing of your personal data, you can at any time withdraw your consent. From that moment, we are no longer allowed to process your personal data.

## 11 **How to contact us in case of a request, question or complaint?**

For questions related to this Privacy Statement, please contact our privacy officer via: [sapna.pawar@dllgroup.com](mailto:sapna.pawar@dllgroup.com)

If you would like to exercise any of your rights, please do so by completing this form:

[Submit a Request or Complaint](#)

We will respond within one month after we have received your request. In specific cases, we are allowed to extend this period with another 2 months. In order to process your request, we will request you to provide sufficient information to identify you. We may also request you to further specify your request.

We will do our best to handle your request, question or complaint in a timely and appropriate fashion.

If you feel we did not handle your request, question or complaint timely or appropriately, you may also lodge a complaint using the same button in this section.

## 12 **Will we update this Privacy Statement?**

This Privacy Statement will be updated from time to time. For example, in case of additional legal requirements or if we process personal data for new purposes. Please note that you can find the latest version of this Statement on our website [workingatdllgroup.com](http://workingatdllgroup.com).