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# Privacy Statement for Job Applicants

As part of our recruitment process, DLL collects and processes the personal data of job applicants. The privacy and protection of personal data is important to DLL. This Privacy Statement outlines 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: [privacy-anz@dllgroup.com](mailto:privacy-anz@dllgroup.com)

## Privacy Facts

Click the [blue](#) facts for more detail.

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Effective date	<a href="#">August 16<sup>th</sup>, 2023</a>

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## 1 Who should read this privacy statement?



This privacy statement is for individuals whose personal data we collect and process as part of our recruitment process.

This privacy statement applies to you if:

- you apply for a job, role, or position in DLL and share your personal information with us;
- as part of a talent search, we have obtained your personal information from a third party, such as a recruitment agency or from a public job board, such as LinkedIn; or
- you are a former or current employee and apply for a new role.

This privacy statement only applies to job applicants. If you are an employee, customer, or supplier, you will be provided with another privacy statement covering how we manage your personal information for that relationship.

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



De Lage Landen Pty Limited (DLL) is accountable and responsible for the transparent and lawful processing of your personal data. DLL is a private limited liability company established under Australian law.

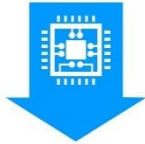
Our contact information is:

Privacy Officer  
De Lage Landen Pty Limited  
GPO Box 1540 Sydney NSW 2001  
1800 259 640  
[privacy-anz@dllgroup.com](mailto:privacy-anz@dllgroup.com)

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

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### 3 What personal data do we process?



**Personal data typically processed by us for recruitment purposes are contact details, your date of birth, your nationality, your copy ID, your employment and educational history, the results of any behavioral/cognitive assessments, and information available on job board websites.**

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

Personal data is “processed” when any activity is undertaken on your personal data such as collection, storage, access, use, transfer, disclosure, and deletion.

When you apply for a job, role, or position at DLL, we will process certain personal data such as:

- Your name, address, and other contact details, including e-mail address and (mobile) telephone number
- Your date and place of birth
- Your gender
- A copy of your ID/passport/proof of identity
- Details of your competencies, skills, experience, and education, such as your curriculum vitae (CV), employment history, educational details and qualifications, and third-party references
- Your work preferences (e.g. your preferred country of employment, areas of interest, etc.).
- Data generated by your participation in behavioral/cognitive assessments
- Information related to any pre-employment screening on integrity and capability, depending on the position for which you are applying
- Your nationality and, if applicable, your entitlement to work in the relevant country;
- Your photograph and/or video recordings (Closed Circuit Television (“CCTV”) footage) from when you visit our office
- Information available on your job board/social networking accounts (LinkedIn, XING, etc.) and/or
- Your IP address, device type, browser type, language settings, the links you click while using our sites and services, dates, and times of connecting to a website, and other technical communications information (as collected through cookies and other similar technology).

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



**If needed, we will process some ‘special categories’ of personal data relating to you. As this information is more sensitive, we take extra care to determine whether such special categories of personal data are necessary for your application.**

We may collect special categories of personal data which are considered more sensitive, such as your health data, criminal history, or your racial or ethnic origin.

We have a legitimate interest in ensuring that we hire personnel who are trustworthy and have no criminal history. In some specific cases we are legally obligated to perform pre-employment

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criminal history screenings. We consult (directly or via third parties) with financial industry incident databases and fraud alert systems to ensure the highest integrity of our potential new hire to protect our interests and the interests of our employees and customers. We only process criminal history information as part of the final assessment of the recruitment process.

## 5 What are the legal grounds we rely on when processing your personal data?



At DLL, we rely on one of the following lawful grounds whenever we process your personal data:

- Consent
- Legal obligation
- Contractual necessity
- Legitimate interests
- Vital interests

Data privacy laws require us to have a lawful basis for processing your personal data. Depending on the purposes for which we process your personal data, the lawful basis may differ.

### Consent

You give your agreement for us to use your data. You are always free to withdraw your consent.

### Legal obligation

Legally, we are obliged to process your personal data.

### Contractual necessity

We need your data to enter into a (labor) contract with you and comply with our contractual commitments to you.

### Legitimate interest

We have a legitimate interest in processing your personal data, which is not outweighed by your interests, fundamental rights, and freedoms. For example, DLL has a legitimate interest in selecting and recruiting the best suitable candidates for job opportunities within DLL to optimize the quality and diversity of our personnel.

### Vital interests

We use your data to protect your vital interests or those of others.

## 6 When and why do we process your personal data?



We will use your personal data for the purpose of recruitment and will collect different personal information at various stages, ranging from your visit to our website to entering into an employment contract.

### If we undertake a talent search

We may engage with specialist recruitment agencies and access job board websites, such as LinkedIn and Xing, to identify suitable candidates and approach them about available roles.

*Lawful ground: Legitimate interest / Consent*

#### **If you visit our website**

We operate cookies on our website which help us to understand how visitors navigate through the site so that we can make improvements to the design. Each website domain will ask for your consent to operate these types of cookies. You can read more about cookies and the data they collect in our [cookie statement](#).

*Lawful ground: Consent*

#### **When you apply for a job with DLL**

We will collect personal data you provide in support of your application so we can assess if you are suitable for the job, role, or position and if we want to invite you for an interview.

*Lawful ground: Legitimate interest / Consent*

#### **If you agree to receive notifications of other positions**

You can request to receive notifications on our jobs website portal for other positions advertised by DLL.

*Lawful ground: Consent*

#### **If we invite you for an interview**

We may ask you to complete cognitive and/or behavioral assessments prior to the interview as part of the application process. We may also need to collect passport/travel document information to book accommodation or travel for your interview attendance.

*Lawful ground: Legitimate interest / Consent*

#### **If we perform pre-employment screening on integrity and capability**

Like all other financial institutions, DLL screens future employees. We have a legitimate interest in ensuring that we hire personnel who are trustworthy and have no criminal history. In some specific cases we are legally obliged to screen future employees. Our screening procedures apply to all applicants who may start working at DLL. In this way, we try to determine whether an applicant is trustworthy. Of course, a positive screening result is mandatory for working at DLL. For specific functions, such as (supervisory) board members and higher management positions, more extensive screening of integrity and capability is required, which may involve regulators.

*Lawful ground: Legitimate interest and in some cases Legal obligation / Consent*

#### **If you visit our offices**

Your name will be shared with relevant front office/security staff so that car parking (where applicable) and entry to the office can be arranged for your visit. CCTV is in operation across our premises and your images may be captured on your visit.

*Lawful ground: Legitimate interest / Consent*

#### **If your application is successful and you are offered a position**

We will validate your identity and the validity of your application by seeking references from your previous employers. For relevant positions (e.g., senior managers and members of the supervisory board), we will undertake additional checks, such as a credit and criminal history check and where relevant, in accordance with the requirements of any regulators. We will also process identity documentation to verify your right to work status.

*Lawful ground: Legal obligation / Consent*

#### **To enter an employment contract with you**

If hired, we will need further personal data, such as your bank account details so we can pay you your salary and any expenses. We may also need further personal data for provision of package benefits (where they apply), such as health insurance, life insurance, and/or car allowance. This personal data collection is explained more fully in our employee privacy statement.

*Lawful ground: Contractual necessity / Consent*

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### To communicate with you throughout the recruitment process

We will process your personal data, such as contact information, each time we communicate with you about the status of your application.

*Lawful ground: Contractual necessity / Consent*

### For other non-recruitment purposes

If required, we will process your personal data to handle any data subject request or complaint which you may lodge with us.

*Lawful ground: Consent*

We may include your personal data in certain mandatory reports to our related entities, regulators and supervisors.

*Lawful ground: Legal obligation / Consent*

We may process your personal data indirectly as part of our systems monitoring and data loss prevention program.

*Lawful ground: Legitimate interest / Consent*

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



**Generally, we will only store your personal data for as long as we need it to complete the recruitment process.**

In some instances, we may need to store your personal data beyond completion of the recruitment process for legal or regulatory purposes.

If you make a complaint about any aspect of our recruitment process, we will be obliged to keep your personal data for a longer period of time, as it is needed to properly address your complaint. In specific cases, we may retain certain personal data for legal proceedings.

## 8 With whom will we share your personal data?



**Where needed, we may share your personal data with:**

- Other DLL entities globally or within the Rabobank Group
- Trusted third parties outside DLL or the Rabobank Group.

Sometimes we may have a clear and legitimate reason to share your data with other parties.

### Sharing data within the DLL Group

Our global recruitment system allows access to our talent acquisition teams to view applications of job applicants from DLL entities located in different countries.

### Sharing data within the Rabobank Group

DLL is a wholly owned subsidiary of Coöperatieve Rabobank U.A., a Dutch Bank with registered office in Amsterdam, the Netherlands, in short “Rabobank.” The “Rabobank Group” consists of Rabobank plus all its subsidiaries. There may be times when we share personal data with Rabobank or other Rabobank Group entities. For instance, we may know of another vacancy within Rabobank Group that would be ideal for you.

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### Sharing data outside the Group

Like any other company, we rely on the services of third parties.

When we engage specialist suppliers, consultants, or contractors to assist us in running our business, we may share your personal data with them where it is necessary for the service they provide to us. For instance, we may use a third party to perform a behavioral/cognitive assessment and pre-employment screening.

Any third party that we employ is checked to ensure they are reliable, and we only engage them where they enter into a proper contract with us, and implementing appropriate security and other measures to guarantee that your personal data remains confidential.

When legally obligated to do so, we will share your personal data with government authorities, regulators or supervisory authorities, and law enforcement agencies.

### Disclosure to other countries

Personal data may be disclosed to entities within the Group and third parties in jurisdictions including: Argentina, Austria, Belgium, Brazil, Canada, Chile, China, Denmark, Finland, France, Germany, Hungary, India, Ireland, Italy, Korea, Mexico, Netherlands, New Zealand, Norway, Poland, Portugal, Singapore, Spain, Sweden, Switzerland, Turkey, United Kingdom and United States.

## 9 How do we handle the transfer of your personal data to a country where the standards for the protection of personal data are not as high?



When we share personal data across borders within the Rabobank Group, we rely on Rabobank's Binding Corporate Rules.

### Transfers within the Rabobank Group

When we share your data with other members of the Rabobank Group that are in other countries than the country in which your personal data was originally collected, we rely on the Rabobank's Privacy Codes. The Rabobank Privacy Codes apply as "Binding Corporate Rules" (BCRs) which are a set of rules that all Rabobank Group entities must comply with to ensure an adequate level of protection for your personal data. Because of these codes, the same rules apply to all members of the Rabobank Group, permitting us to share data within the Rabobank Group. The Rabobank Privacy Code is available on our website.

### Transfers outside the Rabobank Group

When we transfer your data to a third party located in another country, we will apply additional safeguards so that your data is protected to the same level as the standards applied across the Rabobank Group.



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## 10 How do we protect your personal data?



We use various technical and organizational measures to protect your personal data against destruction, loss, unauthorized disclosure, and unlawful processing. 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.

DLL is subject to the Binding Corporate Rules of the Rabobank Group. This means we must meet minimum standards in the collection and processing of personal data.

DLL is committed to taking the necessary organizational and technical measures to protect your personal data when we process it and share it with third parties. These include:

- All our employees are subject to confidentiality obligations to ensure the adequate protection of your data
- We use appropriate security measures to ensure the confidentiality, integrity, and availability of your data as well as certifying systems and services which are resilient and are able to restore data in the event of a data loss
- Where possible, we aim to secure your personal data by lessening or removing personally identifying elements
- We regularly evaluate the effectiveness of our technical and organizational measures to ensure continuous improvement in the security of processing personal data
- We usually only 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 closely relates 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 recruitment process for the other/similar position
- When we share your data with third parties outside of the Rabobank Group, we perform due diligence and thorough assessments of those parties and verify the secure processing of your personal data by way of contractual terms and conditions.

## 11 What choices and rights do you have regarding your personal data?



Individuals are granted certain rights concerning the processing of their personal data. These rights are:

- the right of access and rectification
- the right of erasure
- the right to restrict personal data processing
- the right to data portability
- the right to object to data processing, and
- the right to withdraw consent.

Global privacy laws differ when it comes to individual rights regarding personal data. DLL, however, offers all job applicants the following rights concerning the processing of their personal data:

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### Access and Rectification

You can ask us to access the personal data we hold about you. Where you believe that your personal data is incorrect or incomplete, you can ask us to correct or add more detail to your personal data.

### Erasure

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

### Restriction

You can ask us to limit the personal data we hold about you. We may refuse this type of request if we have a lawful reason to continue holding your personal data (e.g., the exercise of a contract, a legal archiving duty, or the establishment, exercise, or defense of legal claims).

### Portability

You have the right to ask us to provide to you a copy of your personal data in a structured and machine-readable format or to transfer your personal data on your behalf to a third party. Transfer of personal data directly to a third party can only be done if it is technically possible.

### Objection

You have the right to object to the processing of your personal data. If you object to our processing of your information, we will stop the processing where there is no overriding legal or regulatory requirement. If an overriding requirement exists, we will inform you of this.

### Consent withdrawal

If you have given your consent to us to process your personal data, you can withdraw your consent at any time. We will stop any processing allowed solely by consent within 30 days of receiving your request.

### Consequences of not being able to process personal data

If we are unable to process some or all of your personal data, it may impact on how and to what extent we may continue to interact with you in relation to your job application.

## 12 How can you contact us with a request, question, or complaint?



We would like to hear from you if you have any questions about this Privacy Statement, or if you wish to exercise any of your rights.

For questions related to this Privacy Statement, please contact our local privacy officer or local compliance officer via: [privacy-anz@dllgroup.com](mailto:privacy-anz@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 some cases, however, we may need to extend this period for up to another 2 months. We may need to ask you for some additional details to clarify your request or provide verification of your identity.

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We will do our best to handle your request, question, or complaint quickly and efficiently.

If you are unhappy with how we handle a request, question, or complaint, you can contact your local Data Protection Authority. You can find the contact details of your local Data Protection Authority below:

Office of the Australian Information Commissioner  
GPO Box 5288 Sydney NSW 2001  
Telephone number: 1300 363 992

## 13 Will we update this privacy statement?



**Last updated on August 16<sup>th</sup>, 2023.**

This Privacy Statement will be updated from time to time 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).