



# Employee Privacy Statement



**Rabobank**

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# 1. Introduction

Privacy is a precious commodity, and the privacy issues that are all around us in today's society are of acute concern to us all. We are confident that within Rabobank, the privacy of our employees is well secured. Our goal in this Employee Privacy Statement is to provide clear and transparent information about how we handle the processing of your data.

When you enter the employment of Rabobank, and throughout your employment with us, certain employee data pertaining to you will be processed. Employee data also falls under the definition of 'personal data' if that data can be traced back to you personally (either directly or indirectly). This is data such as your name, address or personnel number. In the processing of your personal data, Rabobank will adhere to the law and internal and external regulations, including the General Data Protection Regulation (GDPR from May 25, 2018), the Legislative Proposal for the Dutch General Data Protection Regulation Implementing Act (*Uitvoeringswet Algemene Verordening Gegevensbescherming*), and the Rabobank Employee Privacy Code (*Privacy Code Medewerker Gegevens*). Rabobank maintains a register of the data processing activities carried out under its responsibility, and complies with article 30 of the GDPR.

## 1.1 Who is responsible for the processing of employee data?

Rabobank is responsible for the processing of all employee data processed by or at the instruction of Rabobank. For the purposes of this statement, 'Rabobank' is defined as: Coöperatieve Rabobank U.A.

## 1.2 What is the scope of this Privacy Statement?

This statement pertains to all processing of employee data either by or at the instruction of Rabobank in the Netherlands or in the central HR systems.

The term 'processing' is an umbrella term for all forms of 'processing' of employee data. This comprises not only the collection of such data, but also (for example) the recording, arranging, structuring, saving, updating, consulting, forwarding and deletion of data.

## 1.3 What types of your personal data does Rabobank process?

Your personal data is obtained in one of two ways. In some cases, it is information you provide to us yourself, and in others it is data we obtain and process through another channel. The latter is the case, for example, if you exceed your mobile phone's data limit or if your wages are garnished.

Your data is saved in various HR systems. Below, we explain the differences between the major systems used for data processing. The appendices referred to give you a more detailed list of the data collected, in the form of a convenient table.



- **SAP HR:** This system is used primarily for the employment-law information such as name and address details and salary information. It is data such as the data needed to perform your employment contract. There may also be a legal obligation to retain personal data, for example a copy of your proof of identity for the tax authorities. Appendix 8 provides a detailed list of exactly what data is stored in SAP HR.
- **Personnel file:** This is the general file containing all data, forms, etc. on an individual employee. This would include, for example, your employment contract, documents originating from the screening process, and your travel agreement. Appendix 8 provides a detailed list of exactly what data is stored in your personnel file. This appendix also includes a table setting out the legal and internal retention periods and the location in which your data is archived.
- **GROW!:** This is the performance management system that revolves around growth and performance. It is for all employees, and is focused on enhancing your own control of your performance and versatility and increasing your personal leadership. The GROW! system also saves certain employee data. Consider, for example, the MyGROW!Notes and your profile. Appendix 8 provides a detailed list, in table form, of the personal data that is saved.
- **Taleo:** This is an Applicant Tracking System that is used by Recruitment. It is where the personal data of internal and external applicants is saved. Appendix 8 provides a detailed list, in table form, of the personal data that is saved.

#### 1.4 Does Rabobank also process special personal data?

Rabobank will only process special personal data where necessary for the applicable business purposes as defined in the Employee Privacy Code. The table below shows, for each category of special personal data, when this data is processed and for what purpose:

- **Race or ethnic background:** This may apply, for example, for images of you. Rabobank processes this data for the protection of the property of Rabobank and its employees, for access control purposes (i.e., your access pass), and for other security reasons. Image data (e.g. Who's Who) is also used for a number of purposes, such as the employee directories.
- **Personal data pertaining to criminal convictions:** this refers to data concerning any criminal activity, previous record or prosecution for criminal or unlawful activities. This data is necessary to protect the interests of Rabobank, its employees and its customers, including safeguarding the security and integrity of the financial sector. This data is used for screening employees prior to and during the employment and use of and participation in Rabobank incident registers and alert systems for the financial sector.
- **Health:** processing of data concerning your health may be necessary when you are out ill from work, pregnant, etc. Naturally, medical data will never be obtained by Rabobank as your employer (or, for example, your supervisor). However, Rabobank does have to register that you are out ill, and in that event is obliged to make efforts for your reintegration and/or to support you in your recovery. In the event of illness, Rabobank's Health Services will be engaged, and this service will process health data





concerning you in order to provide you with the health care you need. The employees of Health Services are subject to medical confidentiality or a similar principle based thereon. If there are health problems or disabilities that must be addressed by the provision of certain facilities in the workplace, this will also involve the processing of personal data concerning your health. This may include, for example, modification of your workspace or the evaluation of whether you are capable of performing certain work activities.

There are, however, other cases in which data concerning your health will be processed, such as the performance of your pension, healthcare or welfare regulations, when you take parental leave, or whenever you wish to make a claim against systems that provide for claims that are based on your health status (for example, clauses in the collective labour agreement).

- **Sexual orientation:** Rabobank will only process data pertaining to your sexual orientation (including data concerning employee partners) in the event of performance of pension commitments or payment of other benefits.
- **Religion or philosophy of life:** this data may be processed for the purposes of accommodating religious or philosophical practices, dietary wishes or religious holidays. This might be relevant, for example, when an employee takes the banker's oath.

### 1.5 Does Rabobank also process my citizen service number (BSN)?

Rabobank will only record your BSN if there is a legal obligation to do so and only for the specific purpose defined in the law. For example, this obligation is found in the Wage Tax Act 1964, and in the event that Health Services is engaged for your personal reintegration following a period of illness, your BSN will be notified to Health Services.

### 1.6 What rights do employees have?

Of course, you as an employee have certain rights with respect to the processing of your data. Among them are the right to review your data and the right to correct your data. For a complete list of all rights and the way in which you can exercise them, see chapter 4.

### 1.7 Do we forward employee data to parties outside Rabobank?

In some cases, your data will be forwarded to parties outside Rabobank. These will be parties that process or receive data for Rabobank. The reasons for this will be a legal obligation, in the performance of a contract, or because we are engaging an outside service provider.

### 1.8 Is employee information transferred abroad?

#### ***Possible situations within the Rabobank Group***

Your employee data may be exchanged between different divisions of the Rabobank Group in certain situations, for example if you are to perform activities and/or work for foreign Rabobank branches (whether temporarily or permanently). This may require the processing of your data outside the Netherlands.



These Rabobank divisions may potentially be located in countries outside the European Union, and subject to less stringent privacy rules than applicable in the EU.

Transfer of your data to countries within the EU is generally permitted if done within the framework of the employment contract. Of course, there must still be a purpose and a basis for doing so.

As a Binding Corporate Rule, the Rabobank Employee Privacy Code guarantees an appropriate level of protection of personal data within the divisions of the Rabobank Group. Data is shared between the divisions of the Rabobank Group on the assumption of this guarantee.

A more detailed description of the processing of your data within the Rabobank Group is provided in Appendix 9 (Rabobank Group Internal Employment Market).

### ***Possible situations outside the Rabobank Group***

If we forward your data ourselves to other parties outside the Rabobank Group and outside the EU, we evaluate on a case-by-case basis how the data will be processed and what the appropriate measures to adequately protect your data must be. Countries outside the EU may have their own rules for the protection of personal data, and these may be different than those that apply within Europe. If we use third parties outside the EU and the country or international organisation within which this party is located does not, in the opinion of the European Commission, offer adequate protection in the processing of personal data, then we will only transfer personal data to them if there are adequate other safeguards, for example contractual arrangements approved by the European Commission (the 'EU model clause'). If the processing from the Netherlands to the country or international organisation outside the EU does not offer an adequate level of protection and the conditions given below are also not met, the personal data will not be forwarded.

There are four possibilities regarding the transferring of your data abroad outside the Rabobank Group:

- A. From the Netherlands to a country within the EU. The MyGROW!Notes are processed in a system of the third-party supplier Success factors, the database of which is located in Germany;
- B. From the Netherlands to a country outside the EU. The conduct of the periodic Organisational Health Index (OHI) involves the use of a system owned by the third-party supplier McKinsey. The database for this system is located in the United States;
- C. Storage of data within the Netherlands and/or the EU with external database access from within the EU. Taking certain e-learning courses involves processing of data in a system of third-party supplier Drillster. The database with Rabobank data is located in the Netherlands, but this can also be accessed from the support desk in Belgium;



D. Storage of data within the Netherlands and/or the EU with external database access from outside the EU. The performance of the salary process for employees of Wholesale Rural & Retail (WRR) involves the processing of employee data in a system of third-party supplier Willis Towers Watson. The database with Rabobank data is located in the United Kingdom, but this can also be accessed from a support location in the Philippines.

### **Conditional forwarding of data**

Forwarding of employee data to a country outside the Rabobank Group and outside the EU in which there is no suitable level of protection is only permitted if at least one of the following conditions is met:

- a) the data transfer is necessary for an agreement between the employee and Rabobank to be carried out or for the implementation of pre-contractual measures resulting from a request from the employee and which are necessary for an agreement to be concluded;
- b) the data transfer is necessary for the conclusion or implementation of an agreement which has been or is yet to be concluded between Rabobank and a third party in the employee's interests;
- c) the data transfer is necessary on account of serious reasons of general public interest, or in order to establish, exercise or defend against legal claims;
- d) the transfer is necessary to safeguard vital interests of the employee;
- e) the data is transferred via a register established by legal order which can be consulted by everyone, or by any person who can claim a legitimate interest, insofar as the legal conditions for consultation have been satisfied in the relevant case;
- f) the data is transferred on the basis of an agreement which has been drawn up using the European Commission's model contracts;
- g) the data is transferred on the basis of approved Binding Corporate Rules and Employee Privacy Code;
- h) the Minister of Justice has granted a permit for transferring the data or for categories of data provision;
- i) if issue is on the basis of a certification/approved code of conduct.

### **1.9 How long is the employee data retained?**

Rabobank retains your data no longer than necessary for the purposes for which we have collected it or the purposes for which the data is reused. Individual laws prescribe different retention periods.

A list of how long we retain each type of data is provided in chapter 3.8. For what is stored outside HR in IT systems, please refer to the ICT Code of Conduct (GIC).

### **1.10 What are the tasks of a Data Protection Officer?**

Rabobank has designated a Data Protection Officer. The task of a Data Protection Officer is to monitor compliance with the GDPR and perform certain other tasks as described in the GDPR. The Data Protection Officer can be reached through the FM-box [privacyoffice@rabobank.nl](mailto:privacyoffice@rabobank.nl).



## 2. Description of the Purpose and Grounds for processing employee data

Your data will only be processed for properly specified, explicitly defined and justified purposes (see section 2.1) and where there is a legitimate basis for the processing (see section 2.2). The conditions that must be met are described in chapter 3.

### 2.1 Purposes for processing of employee data

Rabobank may process your data for the following business purposes:

- Human Resources and personnel policy;
- business operations and internal management;
- health, safety, security and integrity;
- company reports and analysis and development of the organisation;
- legal obligations;
- protection of your vital interests.

### 2.2 Ground for processing of employee data

The reason for processing your data must be to achieve one or more of the purposes described in this chapter. There must also be a basis for the processing.

Your data will only be processed if:

- a) the data processing is necessary for the performance of a contract:
  - to which you are a party;
  - or in the performance of pre-contractual measures resulting from a request by you and which are necessary for entering into a contract such as your employment contract, upon screening and for assessment purposes;
- b) the data processing is necessary in order to comply with a statutory obligation borne by Rabobank, such as required disability administration in the event of a long-term period of occupational disability;
- c) the data processing is necessary to secure a vital interest of yours (such as emergency contact information for your family in the event of an emergency);
- d) the data processing is required to further the legitimate interests of Rabobank or a third party to which the data is provided, unless an interest of yours or your fundamental rights and freedoms prevail over Rabobank's interests.

### 2.3 Permission as grounds

Asking permission of employees is not allowed in the majority of cases due to the hierarchical working relationship between the employee and the manager. Permission can only be valid grounds if, from the outset, there are no clear negative consequences for the employee connected with it. Permission must always be given voluntarily, the



employee must be informed of this beforehand, and the relevant Data Protection Officer must also approve the request in advance. You are at all times entitled to revoke the permission you grant.

## **2.4 Human Resources and personnel policy**

This goal comprises the processing necessary to perform an employment contract or other agreement with you, or the processing required to take the steps necessary prior to entering into an agreement at your request, or for the management and administration of recruiting and outplacement activities, assessments, deployability, leave and other absences, remunerations and benefits (including pension), payments, tax-technical matters, career and talent development, talent management, global mobility, performance management, HR analyses, emoluments, training, travel arrangements and expense reimbursements, insourcing of external employees, and the communication with you as employee. One example is the data saved in MyGROW!Notes, which can be used for internal analyses. These analyses are always conducted in a manner such that they cannot be traced back to you. The data will always be treated as confidential.

## **2.5 Business operations and internal management**

This purpose comprises activities such as drafting work schedules, setting work times, managing operating resources, availability of central processing facilities for maximum efficiency, performing internal audits and investigations, implementing measures in the context of business management and the management and use of employee address files, archiving and insurance purposes, legal or business consulting, preparing or being involved in dispute resolution, and authorisation management. For example, we establish what systems you must have access to in order to perform your job, but also log your visit at reception.

## **2.6 Health, safety, security and integrity, including guaranteeing the security and integrity of the financial sector**

This purpose comprises activities such as the protection of the interests of Rabobank and its employees and customers. This includes guarantees for the security and integrity of the financial sector, and specifically uncovering, preventing, investigating and combating criminal or reprehensible conduct or attempted conduct of such nature directed against Rabobank or its employees and customers. We screen employees prior to, and if applicable, during, the employment. The use of and participation in the Rabobank incident registers plus alert systems of the financial sector. Activities pertaining to health and safety in the workplace. The protection of Rabobank, employees, and the property of customers, as well as employee authentication. For example, certain positions are subject to logging requirements. If this applies to you, you will be informed in advance. For example, if you work with investment products, we are legally obliged to log all conversations, because they may potentially serve as evidence at a later stage. Rabobank has a standard protocol for logging audio, video and chats.



## **2.7 Analysis and development of the organisation, company reports, and acquisitions and divestments**

This purpose comprises activities like taking surveys of employees, managing mergers, acquisitions and divestments, and processing employee data for company reports and analyses, such as those processed by HR Analytics. This includes, for example, conducting employee satisfaction surveys.

## **2.8 Legal obligations**

This purpose comprises the processing of employee data where necessary for the performance of tasks for the fulfilment of statutory obligations or recommendations for the sector that are binding on Rabobank, including tasks for the purposes of preventing money laundering, the financing of terrorism and other crimes, and to that end disclosing Personal Data to government institutions and regulatory authorities, including the tax authorities.

## **2.9 Protecting the vital interests of employees**

This purpose comprises processing necessary to protect the vital interests of an employee. A vital interest is an interest that is essential to a person's life or health, in a situation in which we cannot ask for the person's consent, for example if there is an acute threat but a person is unconscious or not mentally capable of granting consent.



# 3. Principles in the processing of employee data

Your data may only be processed for properly specified, explicitly determined and justified purposes, as stated in section 2.1, and there must be legitimate grounds for doing so, as stated in section 2.2. This chapter sets out the principles that Rabobank must observe in the processing of your data.

## 3.1 Lawfulness, fairness and transparency

We are required to process your data in accordance with the law and in an appropriate and meticulous manner. Transparency is an important principle in the protection of privacy and of Rabobank. This privacy statement informs you of what data about you is processed and why.

## 3.2 Necessary and proportional

Rabobank processes your data insofar as your data is adequate, relevant and necessary for the purposes (proportionality). We always look at the minimum data/personal data required. In processing your data, an assessment is made as to whether the purpose could not reasonably be achieved in a way less disadvantageous to you (subsidiarity). One example is voice logging. Here we determine ahead of time whether it is actually necessary for your telephone conversations to be logged. Naturally, it makes a difference whether you have a position in which you advise customers entirely over the phone, or whether you only have the occasional conversation with them.

## 3.3 Limited access and confidentiality

Other employees of Rabobank are only authorised to view/process your data where necessary for the performance of their work (for example, to pay your salary). Additionally, all employees must observe the confidentiality obligations dictated by their own employment contracts and the Rabobank collective labour agreement.

## 3.4 Security

Rabobank takes appropriate technical and organisational measures to prevent your data from being lost or improperly processed. The measures will also be aimed at preventing the unnecessary accumulation and further processing of your data.

## 3.5 Further processing must be compatible

Your data may only be further processed to achieve justifiable company objectives other than the original objective if that original objective and the new objective are closely connected. The sensitivity of the employee data and the possible negative consequences for the employee concerned will be decisive in whether or not the data can be used for other objectives or whether or not further measures must be taken, such as:



- restriction of access to the data;
- imposing supplemental security measures;
- informing the employee concerning the further purpose;
- offering the option to object (opt out); or
- obtaining advance consent for the processing (opt in).

In view of the above, regulation of this process is required. The decision of whether the use or reuse of employee data for a particular purpose is permitted falls to Rabobank Human Resources, because this department has end responsibility for the management, use and securing of the integrity of this data. All new initiatives for the processing and/or use of employee data (and HR systems, HR processes and/or in cases of monitoring employees) must be submitted to the Employee Data Committee (EDC) for approval.

### **3.6 Further processing in context of internal employment market**

Your data can be exchanged between divisions of the Rabobank Group under the preconditions stated in chapters 2 and 3 of this Employee Privacy Statement. Examples of the exchange of employee data within the Rabobank Group are set out in chapter 9.

### **3.7 Processing of personal data of minors**

Processing of personal data of family members younger than 16 is in accordance with the provisions of article 8 of the GDPR and article 5 of the UAVG (the Dutch General Data Protection Regulation Implementing Act (*Uitvoeringswet Algemene Verordening Gegevensbescherming*)). This can only be done with either consent or authorisation to grant consent from legal representatives in the place of the data subject. Personal data of a data subject of 16 years of age or older may be processed legitimately (i.e., without consent or authorisation for consent of the legal representative).

### **3.8 Storing data**

Your data should not be stored in a way which allows you to be identified for any longer than is necessary to achieve the relevant company objectives. For a more detailed explanation of the retention periods for the personnel and managers' file, see chapter 5. Aspects include, for example, that we anonymise application information so that we can conduct analyses to allow us to perform directed search campaigns to fill vacancies.

### **3.9 Data breach**

A data breach is a security incident by which the data of one or more employees becomes accessible or available to an unauthorised person.

Examples include:

- someone gains unauthorised access to SAP HR as a result of erroneous authorisation/abuse of authorisation;
- a letter with salary data is misaddressed, as a result of which it is delivered to the wrong address;
- an e-mail containing employee data is sent to the wrong internal recipient.



If such a data breach is discovered, this must be reported immediately by means of the appropriate procedure. The report is then evaluated internally. If necessary, the data leak will then also be reported to the Dutch Data Protection Authority, the AP (*Autoriteit Persoonsgegevens*). A report to the AP must be made within 72 hours after the data breach is discovered.





# 4. Employee rights

This chapter covers your rights as an employee.

## 4.1 Right to transparency of information

Rabobank processes employee data. This data also includes personal data. You are entitled to clear and transparent information about the processing of this data. Sometimes we give you more or different information, for example if Rabobank documents your data in its incident registers. If this happens, Rabobank will inform you separately (where permitted to do so). Likewise, if there are other reasons to inform you further to this privacy statement, we will do so, for example by e-mail or another channel.

## 4.2 Right to access, rectification and copy

You have the right to ask for the data about you that Rabobank processes. The list of data will contain information concerning the source, type, purposes and categories of recipients of the employee data in question. If your data is incorrect or incomplete, or in violation of applicable law, you are entitled to have your data rectified.

## 4.3 Right to be forgotten

You can ask for the data registered about you to be deleted if you object to the processing of that data. An example is if the processing is not legitimate or no longer necessary for the purposes for which the data was collected. An example of processing that is not legitimate may be the documentation of sexual orientation.

## 4.4 Right to restriction of processing

In certain cases you may request restriction of the personal data concerning you that is processed. This means that data can only still be processed with your consent or in special circumstances, for example, if the processing is not legitimate.

## 4.5 The right to not be subject to fully automated decision-making

Automated decisions are decisions about you that are made by computers and not/no longer by people. Rabobank is legally entitled to make use of automated decision-making including profiling. But this is subject to certain rules. Does a decision have legal consequences on you, or could you be disadvantaged by it? If so, then we would not be allowed to make an automatic decision on you. At present, Rabobank does not permit automated decision-making with regard to employees.

## 4.6 Right to data portability

You have the right to request that the data that you have provided to us on the basis of an agreement or which are processed with your permission be delivered to you or transferred to another party.



Transferred to another party is only an option where technically possible. A great deal of this information is already available to you via HR Self-Service. If you request your data, Rabobank will transfer it to you in a structured and readable form.

#### **4.7 Right to objection**

We process your data because we as employer have a justified interest in doing so. However, you can object to this processing, in which case we will make a new determination of whether your data should no longer be used for this purpose. We will stop the processing if your interest outweighs our interest. We will inform you of our decision, stating reasons. If the decision does not lead to a result acceptable to you, you have the option to make use of the Industrial Relations Disputes Procedure (*Geschillenregeling Arbeidsverhoudingen*).

#### **4.8 Procedure**

If you have made one of the requests described above, then your question will be answered via the HR Portal within one month after receipt.

That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. In that event, we will keep you informed of the progress on your request. If the provision of the data involves the data of third parties, these third parties can be asked in advance whether they have objections to the provision.

A request for review or rectification will normally be at no cost to you. You may be asked to further specify your request. We may then ask for identification, because we need to know for certain whether we are issuing the data to the right person.

In some cases we will not be able to comply with your request. We may, for example, not be required to delete the data if it is of substantial importance to Rabobank or if Rabobank is legally obliged to retain it.

#### **4.9 To whom should I direct a question or complaint concerning personal data?**

For questions about the processing of personal data, you can contact the Rabobank division that processes your data or the HR Privacy Officer, who can be reached via the FM-box [privacy.officer.HR@rabobank.nl](mailto:privacy.officer.HR@rabobank.nl).

For complaints about the processing of personal data, you can approach the Rabobank division that processes your personal data. If the response is unsatisfactory, you may submit this to the HR Privacy Officer. If this still fails to produce a result acceptable to you, you have the option to make use of the Industrial Relations Disputes Procedure (Postbus 93374, 2509 AJ, The Hague).

# 5. Retention periods of personnel file and managers' file

HR Services saves all documents in your personnel file. Any documents that may not legally be saved in your personnel file are saved in the managers' file.

A table with retention periods for documents in the personnel and managers' file can be found in this chapter. The table is intended to indicate which documents should be kept and for how long. It also specifies where individual documents should be kept. And it makes a distinction between documents for which retention is mandatory (M) and for which retention is optional (O).

## 5.1 Mandatory/Optional (see table)

'Mandatory' means that the document indicated must always be present, and is required to be stored in electronic employee file or managers' file. The basis for this is often the law or may be dictated by a policy/employment law perspective. In the latter case, there may not always be a legal basis, but Rabobank considers retention of the specified documents important for reasons such as possible future disputes or internal review. Some documents, however, are always required, for example copies of proof of identity or employment contracts.

'Optional' means that this document may not exist, but if it does it must be retained.

'Bicycle plan', for example, is listed as optional. This means that if the company has a bicycle plan this document must be kept for the period indicated. If this form is not applicable to an employee, it cannot (and need not) be kept. The introduction of STP (Straight Through Processing) has meant that there is no longer the need to keep many documents.

## 5.2. STP/order, workflow or work forms

The STP (Straight Through Processing) forms and other instruction, workflow or work forms must be retained for internal review purposes. The underlying documents should be kept if applicable and if given in the table.

## 5.3. Data retention periods

The various individual data protection laws each stipulate different retention periods (2, 5 or 7 years). In some cases the retention periods are calculated from the date the document is created, and in other cases from the date of the end of employment. To reduce complexity we have opted for a retention period of 2 or 7 years after the end of employment. The choice of 7 years is as often as not based on the legal 5-year term of limitation of salary claims or other types of claim based on agreements and concerning

reconstructions in future employment-law disputes. The choice of 2 years is based primarily on a lack of legal necessity or on the underlying assumption of employee privacy, i.e. to record and retain as little as possible.

#### 5.4. Exceptions

The most important exceptions to retention periods of 2, 7 to 15 years after termination of employment are:

- Data relating to applications from unsuccessful applicants for positions
- Data relating to the screening process of unsuccessful applicants for positions
- Expense claims
- Attachment of earnings
- Personal data concerning health (occupational health and safety service). For more information see Rabobank Health and Safety Regulations

##### ***Expense claims: 7 years after current***

Expense claims go via the salary administration system, with the employee submitting an electronic version and retaining the original document for at least six months in case an audit/review is required. HR Services keeps the expense claim and documentation for 7 years after submission.

Application data (including screening information) of rejected applicants are no longer current after 4 weeks. All application data, such as application letters, CVs and any correspondence or e-mails involved, is destroyed no later than 4 weeks after the rejection of the candidate. This data may be kept for one year after rejection if the applicant has given permission. It is advisable to document this permission or confirm the applicant's consent in writing. The management file of successful applicants is kept for 2 years after the termination of employment.

All data used in the screening process of rejected applicants for positions is deleted four weeks after the screening process has ended. The personnel file of successful candidates is kept for 2 years after the termination of employment.

##### ***Attachment of earnings***

Documentation of attachment of earnings is subject to a maximum retention period of 4 weeks. In the interests of your privacy (including the stigmatising effect of an attachment of earnings), the documentation should be deleted as soon as the attachment of earnings has ended. However, be aware that you are entitled to approach the employer for up to 5 years after the establishment of the attachment of earnings, for example with a claim that the attachment of earnings was unjust/went on for too long/was far too high an amount. In order to prove this, you will need the required documentation. For this reason, the underlying documentation has a retention period of 7 years after the end of employment, but this is retained at HR Services.



## 5.5 Explanation of table of content of employee file and managers' file

By law, data may only be archived in your personnel file at HR Services if necessary for the objective of the personnel file.

The data that may not be archived by HR Services in the personnel file will be archived in the managers' file.

<b>Content of employee file and managers' file</b>				
<b>Z-Code</b>	<b>Description</b>	<b>Mandatory (M) or Optional (O)</b>	<b>Retention periods: x weeks/year after end of event or 7 years after end of employment</b>	<b>Where archived:</b>
Zarbduur	Adjustment of employment duration	O	7 (after employment end)	HR Services
Zarbeid	Appointment Letter and Employment Contract	M	7 (after employment end)	HR Services
Zcontract	Appointment Letter and Employment Contract – change of employment	M	7 (after employment end)	HR Services
Zvrijstel	Supplemental employment arrangements – addendum w.r.t. 30% scheme	O	7 (after employment end)	HR Services
Zarbeid	Supplemental employment arrangements – non-competition and business relations clause (if not stipulated in employment contract)	O	7 (after employment end)	HR Services
	Supplemental employment arrangements – function profile	O	7 (after event end)	Managers' file
	Supplemental employment arrangements – auxiliary positions	O	7 (after event end)	Café
Zstandpl	Supplemental employment arrangements – travelling time compensation	O	2 (after event end)	HR Services
	Supplemental employment arrangements – work on Works Council	O	2 (after event end)	Managers' file
Zaanzeg	Notice letter	M	7 (after employment end)	HR Services
	Active mobility phase	O	2 (after event end)	Managers' file
Zbankeed	Bankers' oath/ethics statement	O	7 (after employment end)	HR Services
	Authorisations	O	2 (after employment end)	Managers' file
Zaanzeg	Redundancy letter	M	7 (after employment end)	HR Services
Zdetach	Secondment agreement	O	7 (after employment end)	HR Services

zDSI	DSI certificate (Dutch Securities Institute)	O	2 (after event end)	HR Services
Zgeheim	Nondisclosure agreement	O	7 (after employment end)	HR Services
	DT approval for official position	O	7 (after employment end)	Managers' file
Zindienst	Commencement of employment form	M	7 (after employment end)	HR Services
Zverklndb	DNB approval for official position	O	7 (after employment end)	HR Services
Zbetaal	Wage tax declaration and account number	M	7 (after employment end)	HR Services
	Attachment of earnings	O	4 weeks (after event end)	HR Services
Zmeeluist	Monitoring declaration	O	2 (after employment end)	HR Services
	Substantiation of suitable position (suitability forms and interest forms)	O	2 (after event end)	Managers' file
	Security account(s) declaration forms	O	7 (after event end)	Café
Zvoorschot	Advance funding order form	O	2 (after event end)	HR Services
Zopzeg	Termination letter	O	7 (after employment end)	HR Services
zbenoemov zbenoemsk zdemotie	Promotion/demotion/ appointment letters	O	7 (after employment end)	HR Services
	Salary arrangements	M	7 (after employment end)	Managers' file
	Screening file of unsuccessful candidates	O	4 weeks (after event end)	Managers' file
Zscreen	Screening – Former employer statement	M	2 (after employment end)	HR Services
Zscreen	Screening – Feedback to employee	M	2 (after employment end)	HR Services
Zscreen	Screening – Result of EVA/ VIS/SFH screening	M	2 (after employment end)	HR Services
Zscreen	Screening – Statement on screening upon start of employment	M	2 (after employment end)	HR Services
Zscreen	Screening – Declaration of consent for integrity investigation	M	2 (after employment end)	HR Services
Zscreen	Screening – Report substantiation	M	2 (after employment end)	HR Services
Zscreen	Screening – Delay e-mail	O	2 (after employment end)	HR Services
	Application – File of unsuccessful candidates	O	4 weeks after end of event (unless agreed otherwise with candidate)	Managers' file
	Application cover letter and CV – Successful candidates	O	2 (after employment end)	Managers' file
Zstageo	Internship agreement	M	2 (after event end)	HR Services
Zstagev	Internship placement	M	2 (after event end)	HR Services



	Declaration of independent contractor status (VAR-WUO/VAR-DGA)	O	7 (after employment end)	Managers' file
Zuitdienst	Settlement agreement	O	7 (after employment end)	HR Services
Zidbewijs	Residence/work permit (non-EU nationals)	O	7 (after employment end)	HR Services
Zidbewijs	Copy of ID and work permit	M	7 (after employment end)	HR Services
Zvergoed	Reimbursements and allowances	O	7 (after employment end)	HR Services
Zrvc	Allowance(s), Supervisory Board	O	7 (after employment end)	HR Services
Zwwverkl	Travel agreement	M	2 (after employment end)	HR Services
Zberisping	Warning with sanction	O	7 (after employment end)	HR Services
Zberisping	Warnings and reprimands	O	7 (after employment end)	HR Services
Training and Development				
Zstudiet	Repayment of training costs letter	O	2 (after event end)	HR Services
Zstudied	Declaration of study expenses	O	2 (after event end)	HR Services
Zcertificaat	Diplomas and certificates (copies)	M	2 (after employment end)	HR Services
Zkwalif	Qualifications	O	2 (after employment end)	HR Services
	PDP form/career development commitments	O	2 (after event end)	Managers' file
	Psychological assessment/report	O	2 (after event end)	Managers' file
Zstudio	Study agreement	O	2 (after event end)	HR Services
Employment conditions schemes and leave				
Zadverlof	Adoption leave letter	O	7 (after event end)	HR Services
Zverlofcr	Correction of leave hours	O	2 (after event end)	HR Services
Zfiets	Bicycle plan	O	7 (after event end)	HR Services
Zfiscver	Tax offsetting	O	7 (after event end)	HR Services
Zjubilea	Anniversary letter	O	7 (after employment end)	HR Services
Zlease	Lease/declaration of no personal use	O	7 (after event end)	HR Services
Zobverlof	Unpaid leave	O	7 (after event end)	HR Services
Zouverlof	Parental leave	O	7 (after event end)	HR Services
Zsaverlof	Sabbatical leave	O	7 (after event end)	HR Services
Zseverlof	Seniors scheme	O	7 (after employment end)	HR Services
Zverhuis	Relocation expenses scheme	O	2 (after event end)	HR Services
Zverlofur	Buying leave hours	O	2 (after event end)	HR Services
Zzoverlof	Care leave letter	O	2 (after event end)	HR Services
zzwverlof; zzwanger; zbvverlof	Pregnancy and maternity leave	O	2 (after event end)	HR Services

	GROW! and GROW! remuneration	O	5 (after event end)	PM/TriPPle info 5 years
Zbonus	Bonus and/or incentive letter/Incentives	O	7 (after employment end)	HR Services
	Illness, occupational disability			
	Re-integration – Current assessment	O	2 (after event end)	Managers' file
	Re-integration – Absence and re-integration checklist	O	2 (after event end)	Managers' file
	Re-integration – First year evaluation	O	2 (after event end)	Managers' file
	Re-integration – Final evaluation	O	2 (after event end)	Managers' file
	Re-integration – Other	O	2 (after event end)	Managers' file
	Re-integration – Action plan	O	2 (after event end)	Managers' file
	Re-integration – Problem analysis	O	2 (after event end)	Managers' file
	Re-integration – Interim evaluation	O	2 (after event end)	Managers' file
	Re-integration – Progress meetings	O	2 (after event end)	Managers' file
Zwazo	WAZO (Work and Care Act) form	O	2 (after event end)	HR Services
	Disability decisions (WIA/WAO)	O	2 (after employment end)	Managers' file
	Insurances, Retirement and Termination			
Zanwhiaat	ANW (Surviving Dependents Act) gap insurance	O	7 (after employment end)	HR Services
	NIY agreement	O	7 (after employment end)	Managers' file
Zuitdienst	Retirement and Termination	O	7 (after employment end)	HR Services
	Other			
Zancien	Service years burden of proof	O	7 (after employment end)	HR Services
Zcomloon	Supervisory director remuneration scheme	O	7 (after employment end)	HR Services
Zvorderg	Collected claim	O	2 (after event end)	HR Services
Zinsider	Signed insider letter	O	7 (after employment end)	HR Services
	GZB card – revoke	O	2 (after event end)	Managers' file
	GZB card – confirmation of receipt	O	2 (after event end)	Managers' file
Zinhoud	Withholding	O	7 (after employment end)	HR Services
Znsmachtf	NS (national rail services) authorisation form	O	7 (after employment end)	HR Services
Zportret	Declaration of consent for use of portrait	O	2 (after employment end)	HR Services
Zsalaris	Salary change	O	7 (after employment end)	HR Services
Zvordert	Amount claimable	O	2 (after event end)	HR Services

ztuchrech	Disciplinary committee ruling	O	7 (after employment end)	HR Services
Zvakbond	Trade union contribution agreement/trade union contribution	O	7 (after event end)	HR Services
Zbustaat	Change of marital status	O	2 (after event end)	HR Services



# 6. Other provisions with regard to the Employee Privacy Statement

## 6.1 Appendices

The appendices to this Employee Privacy Statement make up an integral part of this Employee Privacy Statement.

## 6.2 Duration

This Employee Privacy Statement is valid until further notice, unless provisions of law dictate otherwise.

## 6.3 Grounds for restrictions

In observance of the provisions of the GDPR, UAVG, and the Employee Privacy Code, after prior consultation with the Data Protection Officer in certain situations Rabobank's obligations or the rights of the employee can be declared inapplicable.

## 6.4 Amendment of the Employee Privacy Statement

Rabobank Nederland has the right to change or supplement this Employee Privacy Statement, with prior notice to the employees' representatives. Proposed changes to section 1.3 or chapter 4 of this Employee Privacy Statement will be presented to the employees' representatives for their approval.

## 6.5 Effective date

This Employee Privacy Statement becomes effective on 25 May 2018. It replaces and takes the place of the Employee Privacy Manual as went into effect on 1 June 2014. Examples from practice as identified in the manual will be set out in a separate document.

## 6.6 Extraordinary circumstances

In circumstances not covered by this Employee Privacy Statement, or in circumstances where compliance with the stipulations in this Statement cannot reasonably be met, the Data Protection Officer will decide.



# 7. Definitions

## **Dutch Data Protection Authority**

The independent government institution instituted in the Netherlands that monitors the application of the General Data Protection Regulation (GDPR) and the General Data Protection Regulation Implementing Act (*Uitvoeringswet Algemene Verordening Gegevensbescherming*) (UAVG)).

## **GDPR**

The General Data Protection Regulation. This is the applicable European privacy law with effect from 25 May 2018.

## **Data Protection Officer**

The new European privacy regulation (the GDPR) makes a Data Protection Officer required for organisations that by their nature or size process personal data on a large scale.

## **Third Party**

Anyone, apart from employees, Rabobank, Processor, or any person directly authorised to process employee data by Rabobank or the Processor (see Appendix: Examples of Processors and Third Parties).

## **Family member**

Spouse or partner or child who is part of your household or your emergency contact person.

## **Employee**

We define employee as the following natural persons:

- An employee or former employee of Rabobank, including temporary employees, trainees, contractors and others under direct supervision of Rabobank;
- A past or present executive or non-executive director of Rabobank;
- A past or present member of the Supervisory Board (or similar body within Rabobank).

## **Employee data**

Every piece of information concerning an identified or identifiable employee (and their family members). Where this document refers to 'employee data', this can also be understood as personal data as defined in the GDPR.

## **HR Privacy Officer**

Point of contact for you as employee when in your opinion your request or complaint is not being handled or handled adequately.

**Rabobank**

Rabobank means Coöperatieve Rabobank U.A., registered with the Chamber of Commerce under number 30.046.259, with its registered office in Amsterdam, the Netherlands, excluding foreign branches.

This organisation is registered with the Chamber of Commerce under number 30.046.259, with its registered office in Amsterdam, the Netherlands, excluding foreign branches.

The contact details are:

Office address:

Croeselaan 18  
3521 CB Utrecht

Telephone +31 30-216 0000

Postal address:

Postbus 17100  
3500 HG Utrecht

**Rabobank Group**

Coöperatieve Rabobank U.A and its legal entities and companies affiliated with it in a group relationship.

**To process, processing**

Any operation or set of operations which is performed on employee data or on sets of employee data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Processor**

The party that processes employee data on behalf of the controller.

**Controller**

The party that, either alone or with others, establishes the purpose of and resources for the processing of employee data.



# 8. Appendix:

## List of employee data processed

### 8.1 General

This appendix comprises an overview of the employee data processed in Rabobank's most important HR systems. The retention periods for these HR systems are the same as the retention periods indicated in chapter 5.

This refers to the following HR systems:

- SAP HR
- Employee file
- GROW!
- Taleo

### 8.2 SAP HR

For the most part SAP HR comprises employment conditions. An overview is given below of the employee data in SAP HR. The data is made inaccessible 7 years after termination of employment.

### 8.3 Employee file

For the overview of what employee data in the Rabobank personnel file is processed, we refer to the retention periods in this Employee Privacy Statement.

### 8.4 GROW!

The employee data processed in GROW! is given in the following table. Performance documents and the GROW! documents are retained for 5 years after the date on which they are generated.

### 8.5 Taleo

Taleo contains the application data for employees; this includes the cover letter for the position in question, personal data, training, work experience, etc.

For the retention periods, see the retention periods as referred to in this Employee Privacy Statement.

<b>SAP content</b>	
<b>Data point</b>	<b>Explanation</b>
Salutation code	Mr / Ms
Number of children	relevant to leave schemes
Surname	

Address type	residential address / mailing address / alert address / convalescence address / doctor
ID issue date	
Bank account number	
Company-internal data	Company car data, workplace data (building number, room number, internal phone number, internal mailing address)
Business unit number	bank code
Start date of current marital status	
Start date of leave	
Start date	
Restricted self-identification method	does / does not want to belong to target group (was relevant for Employment of Minorities (Promotion) Act until ± 2001; thereafter not used)
Due date	expected date of birth of child
Marital status	married / unmarried
Citizen service number	
Case Verification Number	identification number for US government
Credit card number(s)	
Part-time factor	
Leave end date	
Personal e-mail address	
Family/contact persons	partner / registered partner / child / guardian
Family/contact persons data	Given name, Initials, Surname prefix, Surname, Sex, Date of birth
Formation position	NUM
Position	NUM
Date of birth	
Country of birth	
Employee country of birth	
Mother's country of birth	
Father's country of birth	
Birth country registration	yes / no objection to entry of data
City of birth	
Sex	
House number	
IBAN (International Bank Account Number)	
ID of an apartment in a building	
Form of identification	type of ID
Cost centre	NUM
Qualifications	Education, start / end date, qualification level
Country code	
Salary component of external transfers	pension savings / single premium deposit / withholding for premium of CVZ (Healthcare Insurance Board) non-payers / withholding for premium of CVZ (Healthcare Insurance Board) uninsured / wage garnishment
Employee group	NUM
Employee subgroup	NUM
Name of assessor	
Name of employee	
Name of SAP employee who changed object	

Nationality	
ID number	
Training number	
Training description	may comprise multiple trainings (trainings and training data were relevant until ± 2007; thereafter not used)
Training data	start /end date, status, complete?, verified?, number of classes, diploma yes/no
Training institution	
Training costs	course fees, exam fees, course material expenses, travel expenses, other study expenses, amount of study expenses reimbursement, number of study leave days
Organisation code	NUM
Organisational unit	NUM
Variable income percentage	
Fixed income percentage	
Personnel area	bank code
Personnel number	
Policy number	health insurance, for external transfers to Healthcare Insurance Board
Postcode	
Province code	
Legal entity	NUM (of the employer)
Goes by	
Salary scale	
Salary step	
Status of employment	active / non-active
Street	
Phone number	
Mobile phone number	
Title(s)	
Hours per week	
Leave entitlement	NUM (number of hours)
Leave type	
Authorisations	powers of attorney (for Chamber of Commerce, etc.)
Initials	
Given name	
Surname prefix(es)	
Disability (Invalidity Insurance Act) information	registration number, decision code, disability class (%), disability benefit class (%), disability benefit percentage, collective labour agreement supplemental percentage, date info, benefit info
Weekly number of work days	
WIA (Work and Income according to Capacity for Work Act) information	registration number, scheme type, benefit type, disability class (%), disability benefit percentage, collective labour agreement supplemental percentage, WIA "SFB" indication (Structurally Functionally Disabled), date info, benefit info
City of residence	
Illness information	number of days, disability percentage
Health insurance	name of organisation
Absence	type: pregnancy / maternity leave, pregnancy, occupational accident, accident (third party fault), organ donation, adoption / foster care leave, second year of illness

<b>GROW! content</b>	
<b>Data point</b>	<b>Explanation</b>
Surname	
Department	description and numerical
E-mail address	
Position	description and numerical
Sex	
HR Advisor	n/a
Customer contact	yes / no
Country	NL
Location	
Login method	Fixed value "SSO"
Manager	name
Employee group	description and numerical
Employee subgroup	description and numerical
Monitoring function	yes / no
Organisational unit	description and numerical
Personnel number	
PDP form	document
Potential indication	Talent / vertical grower / horizontal grower / potential reached / demotion. As of 2018: Top-match, Match, Re-match.
Performance document	document
Goes by/First name	
Role	M=manager, E=employee
Salary scale	
Status of employment	
Time zone	standard value
Surname prefix	

<b>Taleo content</b>	
<b>Data point</b>	<b>Explanation</b>
Surname	
Address	
E-mail address	
Employee number (internals)	
Date of birth	
Candidate cover letter	document
Postcode	
Single sign on ID (internals)	Fixed value "SSO"
Candidate application letter	document
Internal telephone number (internals)	
Mobile phone	
Home phone	
City of residence	

# 9. Rabobank Group

## Internal Employment Market

### General

The exchange of employee data takes place between Dutch group divisions and with group divisions abroad taking into account the objectives and grounds as specified in chapter 2 of this Employee Privacy Statement and the conditions in chapter 3.

The data exchanged are the name of the employee, the business email address plus telephone number, the date of posting (from where to where and start and end dates), the family situation and the salary information, because the division will start paying a portion of the salary and must include that in the payroll for tax reasons.

Examples of situations where the exchange of data takes place include:

- Employees joining internal vacancy banks;
- Internal job transfer;
- Pre-employment screening;
- In-employment screening;
- Research by Rabobank Group Audit;
- Investigations by Financial Economic Crime (FEC);
- Services by Rabobank Group Health Services;
- Performance of tasks assigned to Rabobank Nederland concerning employees of foreign entities.

### ***Forwarding of Employee data upon internal transfer.***

When transferring your data in the case of a job transfer within the company, it is important to differentiate between an employee moving to a new position within the same business unit or to a position within another business unit.

#### **A. Within the legal entity (business unit)**

Upon transfer within Rabobank, your current manager will send your management file to your new manager. Obviously, you remain working for the same employer, but the management file must be cleaned up to eliminate information that may no longer be relevant. The sending manager reviews what documents will be relevant to the receiving manager. Normally, data on aspects like performance or GROW!/assessments are deleted after five years. This term may be extended if there are sound reasons for doing so, such as development or performance issues. The term may also be extended for employees with long-term illness or disability. In the interests of compliance with legislation and regulations as well as good employership,

it is important to maintain continuity of support and approach. In these situations, the sending manager takes the initiative to set up an appointment with the new manager to explain the particulars of the case. Personal notes may not be transferred, and must be deleted from the managers' file. If documents are stored in the electronic employee file, these will not be present in the managers' file. The cleaned-up file will be sent by email to the receiving manager. The electronic employee file is automatically administratively linked to the receiving manager.

## **B. Between legal entities of the Rabobank Group**

When someone moves between entities, or when transferring to an affiliated institution or to a group division abroad, the employee data should be dealt with in the same way as with any other new external employer: Transferring data may only take place with the permission of the employee.

There is no definitive list to be made of employee data which can be passed on.

There are in fact no clear rules governing this. Data which, in any event, cannot be passed on in the event of someone moving jobs within legal entities in the Rabobank Group are:

- Medical, sickness and re-integration data;
- Screening data (except the screening result itself);
- Application data;
- Specific personal data (race, philosophy of life, etc.). The basic principle is that this data is not processed.

When employees move on to another institution within the Rabobank Group, Rabobank transfers the employee data with the exception of details covering career support and development, absenteeism, disability and GROW!/assessment data. It is up to the employee to either share or not share this information with the new institution.





# 10. Appendix:

## Examples of Processors and Third Parties

This appendix gives examples of organisations which process or receive your data on behalf of Rabobank.

- Athlon Car Lease;
- Tax Authorities;
- Cruncher (within the framework of data analysis);
- Dukers & Baelemans (within the context of the Teacher Portal in the Learning Portal);
- Interpolis (as part of the performance of insurance contracts);
- Miles (employee satisfaction surveys);
- Oracle (in the context of Taleo);
- SAP/SuccessFactors (in the context of GROW!);
- Syntrus Achmea Pensioenbeheer;
- UWV (Employed Persons Insurance Administration Agency);
- NS;
- Bloomville (Time2Grow).



***Rabobank***