



Privacy Statement for the Recruitment and Selection Process

2018



Rabobank

Privacy Statement for the Recruitment and Selection Process

1. Introduction

Your personal data is in safe hands with us. As a potential job candidate, you must be secure in the knowledge that we do everything we can to protect your data. We comply with all the relevant laws and regulations, specifically the General Data Protection Regulation (GDPR). This Privacy Statement for the Recruitment and Selection process (referred to below as the 'R&S process') explains how your data is processed.

1.1 Rabobank is bound by the applicable rules regarding personal data processing.

What rules apply to the R&S process?

- General Data Protection Regulation (GDPR)
- General Data Protection Regulation Implementation Act (*Uitvoeringswet Algemene Verordening Gegevensbescherming*)
- Incident Alert System Protocol for Financial Institutions (*Protocol incidenten waarschuwingssysteem financiële instellingen, approved by the Dutch Data Protection Authority*)
- Rabobank Privacy Code

1.2 What do we mean exactly by 'personal data' and the processing of this data?

- **Personal data** refers to data which relates to you personally, either directly or indirectly. This might include:
 - Your name and address, date of birth, sex, telephone number and email address
 - Your CV and cover letter
 - Links to your public profiles on websites such as LinkedIn
 - Optional: a photograph and/or audiovisual job application video
- **Processing** refers to any activity involving personal data. When you apply for a job with us, we collect, use and retain your personal data. We do this, among other things, to verify that you hold the qualifications required for the position.

1.3 Whose personal data do we process, and how do we process it, during the job application process?

This Privacy Statement applies to all processing of the personal data of candidates and potential candidates as part of the R&S process at Rabobank. The data is processed

in the HR system in the Netherlands by or on behalf of Rabobank. If you are hired by Rabobank, you will be subject to the Privacy Statement for Employees.

1.4 Who is responsible for processing my personal data?

Rabobank is responsible for processing all personal data processed by or on behalf of Rabobank. In this statement, 'Rabobank' refers to: Coöperatieve Rabobank U.A., registered with the Chamber of Commerce under number 30.046.259, with its registered office in Amsterdam, the Netherlands, not including international branches.

Our contact details are:

<i>Adress:</i>	<i>Postal address:</i>
Croeselaan 18	Postbus 17100
3521 CB Utrecht	3500 HG Utrecht

1.5 How do we obtain your personal data?

We have two ways of acquiring your personal data:

- You provide this yourself or through a third party/third parties (either through referees or an external recruitment agency).
- We also collect data (including contact details) ourselves through resources such as CV databases (e.g. Stack Overflow and LinkedIn; this process is known as 'sourcing'). We do this if we think you might be interested in working for Rabobank. If the recruiter contacts you, they will tell you where they found your details. In addition, they will ask you for permission to use these details to contact you regarding a Rabobank job opening or event. It goes without saying that you can change or revoke your consent at any time.

2. Principles and purposes of processing personal data relating to a job application

We process your data:

- based on your express consent – which, of course, can be revoked at any time;
- if we have a statutory obligation to do so, e.g. making a photocopy of your ID for payroll tax purposes;
- in order to enter into an employment contract with you and subsequently perform this contract;
- based on a legitimate interest on Rabobank's part, e.g. in the case of 'sourcing'.

2.1 For what purposes do we process personal data?

We process personal data for the following purposes:

a. Human resources en personeelsbeleid

We require your personal data in order to be able to properly conduct our R&S process. This includes assessing whether you are suitable for the position and whether we would like to invite you for an interview. Another reason might be to produce an access card, which you require in order to enter the building.

Rabobank pursues a diversity policy because we want our employees to reflect the larger society.

We may ask you, for example, if you are willing to share the country of birth of your parents or grandparents. If you answer the question in the affirmative, we will record these details in an anonymised format.

b. Health, safety, security and ethics (including pre-employment screening)

Like all other financial institutions in the Netherlands, Rabobank subjects future employees to a background check. We are required by law to do so. Our screening procedures apply to all applicants who are potential Rabobank employees. We attempt to ascertain as accurately as possible whether you, as an applicant to the bank, are sufficiently trustworthy. A positive outcome of the background check is, obviously, a condition for getting hired.

All applicants to be screened are subject to the same procedure, which consists of the following two stages:

- **Stage 1:** the original version of your highest qualification will be verified during the job interview.
- **Stage 2:** if we intend to enter into an employment contract with you, we will ask you to complete a statement; this statement advises you that we will be gathering information on you.

This includes the opinions of employers or clients you have had over the past two years regarding your trustworthiness and a test in the EVA¹ and VIS² systems and the *Tuchtregister* (Database of Disciplinary Measures) maintained and updated by the *Stichting Tuchtrect Banken* (Foundation for Banking Ethics Enforcement/FBEE). Based on this information, we will then decide whether you are sufficiently trustworthy to be employed by Rabobank.

We may also use data for this purpose which we obtain from third parties, including former employers (through references we received from you) and recruitment agencies. We may also consult public sources during the job application process, including publicly accessible and professional social media (if this is relevant to the position and is specified in the job advert).

1 EVA is an acronym for *Externe Verwijzing Applicatie* (External Reference Application), consisting of an internal reference database, an external reference database in which data is exchanged between banks regarding individuals who have impaired banks in some way, and the database of *Stichting Fraudebestrijding Hypotheken* (Dutch Mortgage Fraud Foundation), which specifically includes data from mortgage providers, operating outside the banking industry. VIS is a database of stolen or forged identity documents. A database of disciplinary measures maintained and updated by the Foundation for Banking Ethics Enforcement (FBEE) (*Stichting Tuchtrect Banken*) is assessed in relation to complaints relating to the Bankers' Oath.

2 VIS is a database of stolen and forged identity documents.

We also record personal data in order to protect the interests of our employees, visitors, the bank and the financial sector. We do this, among other things, through the CCTV camera security system installed in the reception areas of our various branch offices.

c. Business reports and analysis and organisational development

We may process your data to create business reports, surveys and analyses. We may also merge the various data we possess on you, for example to improve the R&S reports (e.g. the number of job openings, number of applicants and the time it takes to fill these vacancies). The results of the analyses and the resulting recommendations can never be traced back to you.

d. Statutory requirements

We collect data relating to you based on specific domestic and international laws and regulations. Pursuant to the Dutch Money Laundering and Terrorist Financing Act (*Wet ter voorkoming van witwassen en financieren van terrorisme/WWFT*), we are required to verify your identity. When you join the company, we also make a copy of your ID (this is required by law), and we require your Dutch *Burgerservicenummer* (Dutch social security number) for payroll tax purposes.

e. Protection of job applicants' vital interests

We may process data in order to protect your vital interests, e.g. your medical details. Suppose you are in acute danger (and have lost consciousness) and are no longer able to give consent for your medical details to be shared. In this case, these details are vital in order to be able to provide you with immediate assistance.

3. Do we also process special categories of personal data?

By 'special categories of personal data' we mean various types of sensitive data. This data may relate to a person's health, criminal record, and data regarding race or ethnic background. We participate in the incident registers and alert systems for the financial industry and may process criminal-law data for this purpose. The purpose of incident registers and alert systems is to protect the interests of financial institutions, of you as a job applicant, and of our customers. One of the ways in which we do this is through fraud detection.

If you ask us to record special categories of personal data relating to you or are disclosing this data yourself, we will only process this data if there is a clear purpose, there are grounds to do so, and this is necessary for the purpose.

Special categories of personal data may also be processed, for example photographs or video recordings of you. This includes any pictures you might have enclosed with your CV, as well as camera footage recorded of you on entering the building. We process this

camera footage solely for the protection of the property of Rabobank and its employees, and for other security reasons.

4. How do we handle your personal data?

Your personal data is used exclusively by employees who require access to this data on account of their position. The employees who are involved in your application process are bound by confidentiality.

We only reuse data if the original data is related to the new purpose. For example, you apply for a position at a local Rabobank and your application is unsuccessful. However, we decide that you are suitable for a similar position at another branch office. In this case, we will inform you first and will forward your details only after you have given your permission.

5. How do we deal with third parties?

Sometimes we engage the services of third parties, which process personal data on our behalf. This includes external recruitment agencies (e.g. YER, DPR Legal, Michael Page, Ebbinge & Company and Independent Recruiters) and research companies. We can only engage third parties if this suits the purpose for which we processed your personal data and this is sufficiently reliable. Furthermore, we will only hire the services of such a third party or parties if they have implemented the appropriate security measures and guarantee confidentiality.

If your application process includes an assessment, we will notify you in advance and will only save the report to your job application file once you have approved the accompanying report.

6. How long do you keep my details?

If you created an online profile with us, you will be able to use it again for other job applications at Rabobank in the future. We will not be able to view your data any more at that stage.

If your job application was unsuccessful, we will delete your personal data within four weeks of completing the application process. This includes all application details, e.g. your job application letter, CV, email exchange, and the results of background checks and/or assessments, if applicable.

If we do need to retain your personal data for a longer period of time, e.g. for future job vacancies, we will ask for your consent. You can revoke this consent at any time. We will delete your data within one year of the end of the job application process.

If you are joining Rabobank, we will keep the job application file up to two years following your termination of employment.

The data recorded on you as part of the sourcing process is deleted as soon as possible once it is no longer relevant to the purpose. If you and the bank have not been in contact for six months, we will delete all your personal data automatically.

7. What rights do you have in relation to your personal data?

7.1 Right of access and photocopying rights

You may ask us to view the data Rabobank has stored in relation to you, including your public online details and your uploaded CV and cover letter.

7.2 Right of rectification

If your data is incorrect, incomplete or in violation of the law, you can request us to have it rectified.

7.3 Right to be forgotten

You can ask that data recorded in relation to you be deleted if you object to this data being processed. This might be the case, for example, if the processing is unlawful or no longer necessary for the purposes for which it was collected.

7.4 Right to restrict processing

In some cases, you may request that the processing of your personal data be restricted. This means that a smaller amount of data is processed (this is the case, for example, when your CV is updated).

7.5 Right not to be subject to automated decision-making

'Automated decision-making' refers to decisions made by computers rather than people. Rabobank is permitted under the law to make automated decisions, including profiling. We currently do not use automated decision-making in the job application process.

7.6 Right to data portability

Data which has been provided to us based on an agreement and/or with your consent may be transferred to a third party. This can be facilitated only if it is technically feasible. Rabobank will transfer the data you have provided yourself in a structured and readable format.

7.7 Right to object

You have the option to object to the processing of your personal data. In this case, we will make a reassessment in order to verify that it is accurate that your data can no longer be used for this purpose. We will also always inform you of our decision. If the decision is unacceptable to you, you can submit a complaint to the Data Protection Officer at Rabobank or the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*; see Chapter 7).

7.8 Procedure

If you submitted one of the requests described above, we will respond to your request within one month of receipt.

Depending on the number of requests received and the complexity of the request(s), the period may be extended by another two months. We will, of course, keep you updated on the progress of your request. If the data you provided also contains third-party data, such third party may be requested in advance whether they object to their data being processed.

You may be asked to further specify your request. We may also ask you to provide ID because we want to make certain that we are providing data to the right person.

In some cases we may not be able to honour your request. For example, we will not delete the data if it is of significant importance to us or if there is a statutory obligation to retain it. We will notify you if this is the case.

8. Where can I address my question or complaint?

You can direct your questions or complaints regarding personal data processing to the division to which you applied or to the HR Privacy Officer. The latter can be contacted at privacy.officer.HR@rabobank.nl.

If you are not satisfied with the answer to your question, you can submit this to Rabobank's Data Protection Officer at privacyoffice@rabobank.nl. If you are still not satisfied, please go to the website of the Data Protection Authority (Postbus 93374, 2509 AJ, The Hague).

9. Can we amend our Privacy Statement?

Yes, our Privacy Statement may be modified from time to time. If there is new data to be processed, we will amend the Privacy Statement accordingly. You will be able to find the most up-to-date version of our Recruitment & Selection Privacy Statement on our website, along with previous versions of this Statement.



Rabobank