



Privacy Statement

Recruitment & selection process

2020



Rabobank

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1. Introduction

Your personal data are safe with us. As Rabobank we process our customers' data carefully and confidentially. All our services are based on our customers trust that their data are in safe hands with us. What applies to our customers also applies to our employees.

As (potential) candidate for a job you should be able to expect that we handle your data with care. Of course we comply with laws and regulations, specifically with the "Algemene Verordening Gegevensbescherming" (AVG), (the Dutch General Data Protection Regulation Act). In this Privacy Statement on the procedure for recruitment and selection (hereinafter referred to as R&S procedure) is declared how we process your data.

1.1 As Rabobank we are bound by rules regarding the processing of your personal data.

These rules apply to the procedure of recruitment and selection

- the "Algemene Verordening Gegevensbescherming" (AVG, the Dutch General Data Protection Regulation Act);
- "Uitvoeringswet Algemene Verordening Gegevensbewerking" (UAVG; the Dutch General Data Protection Regulation Implementing Act);
- the "Protocol incidenten waarschuwingssysteem financiële instellingen" (Protocol incident warning system for financial institutions, approved by the "Autoriteit Persoonsgegevens", the Dutch Data Protection Authority.)
- Rabobank Privacy Code.

1.2 This is what we mean by personal data and this is how they are processed

Personal data means any data that is directly or indirectly related to you. For example:

- Your name, address, date of birth, gender, phone number and email address;
- Your cv and motivation;
- Links to your public profiles on websites such as LinkedIn;
- Optional: a photo and/or audio-visual application video;

Processing means any operation or set of operations which is performed on personal data or on sets of personal data. When you apply for a job, we collect, use and store your personal data.

One of the reasons for this is to be able to check if you are qualified for the job.

1.3 This is how we process your personal data in case of a job application

This Privacy Statement applies to all processing of personal data from (potential) candidates pertaining Rabobank recruitment and selection procedure.

The processing is performed by or in commission of Rabobank Netherlands and processing takes place in the HR-system. If you enter employment, the Employee Privacy Statement becomes applicable.

1.4 Rabobank is responsible for processing your personal data

Rabobank is responsible for the processing of all personal data processed by or in commission of Rabobank. For the purposes of this statement, 'Rabobank' is defined as: Coöperatieve Rabobank U.A., registered at the Dutch Chamber of Commerce under number 30.046.259, having its registered office in Amsterdam, the Netherlands, excluding foreign branches.

Contact data are:

Visiting address: Postal address:

Croeselaan 18 Postbus 17100
3521 CB Utrecht 3500 HG Utrecht

1.5 This is how we collect your personal data

There are two ways of collecting your personal data.

- You provide them yourself or through third parties (reference or external (recruitment bureau) to us.
- We also collect (contact-)data ourselves through e.g. CV databases (such as Stackoverflow and LinkedIn, also known as 'sourcing'). We do this when we believe you might be interested in working for Rabobank. When the recruiter contacts you, he/she will indicate where your data was found. He/she will always ask for your permission to contact you concerning a vacancy or a Rabobank event by means of these data. Of course you can always change or revoke your consent.

2 Bases for data processing

2.1 We are allowed to process your personal data based on these principles and purposes

We process your data:

- Based on your explicit consent. Of course this can be withdrawn at any time;
- When we are legally obliged to, e.g. to make and store a copy of your ID;
- In order to enter into a (labour) contract with you, and consequently to perform this contract;
- Based on a legitimate interest, as in sourcing.

2.2 This is why we process your personal data

We process your personal data for the following purposes:

Human resources and personnel policy

In order to carry out our Recruitment & Selection Procedure properly, we need your personal data. E.g. to assess if you are suitable for the job and we want to invite you for an interview. Or to create a badge for building access.

Rabobank has a diversity policy. We want our employees to be a reflection of society. This is why we ask you e.g. to share with us in which country you, your parents or grandparents were born. If you confirm that you want to share these data, they will be recorded anonymously.

Health, Safety, Security and integrity (e.g. pre-employment screening)

Like all other financial institutions in the Netherlands, Rabobank is screening future employees. We are legally obliged to do so. Our screening procedures apply to all applicants who may start working at Rabobank. In this way we try to determine whether you as applicant are trustworthy. Of course a positive screening result is mandatory for working at Rabobank.

For all applicants who are to be screened, the same procedure applies. This procedure consists of two phases.

- phase 1: during the job interview your ID will be checked and the original certificate of your highest education will be verified.
- phase 2: when the conclusion of an employment contract is intended, we ask you to fill in a self-declaration on your trustworthiness, and a permission statement. By this statement you give us permission to carry out the screening procedure, i.e. to collect information from former employers in the past two years regarding your trustworthiness and to check against external registers (EVA, VIS, SFH and Tuchtregister of Stichting Tucht recht Banken) for

relevant integrity risks. Based on this information we conclude whether your trustworthiness is sufficient for working at Rabobank.

EVA (Externe verwijzing Applicatie) is a register in which data on persons who have caused harm to banks or committed mortgage fraud are shared. VIS is the register of missing or fake ID's. The "tuchtregister" of "Stichting Tucht recht Banken" is checked against issues regarding the Banker's Oath.

During the screening process we may use data about you that are provided by others, e.g. by former employers (through references that you gave us) or by recruitment agencies. We may also use public sources such as social media (if this is relevant to the position and is indicated in the job offer).

We also record personal data in order to protect the interests of our employees, visitors, the bank and the financial sector. We do this e.g. by using video surveillance in the reception halls of our locations.

Incident registers and warning systems

If you become an employee of Rabobank, but also if you are already an employee of us, we consult our incident registers and warning systems (the IVR) and those of the financial sector (the EVR, the register of the Stichting Fraudebestrijding Hypotheken and the register of the Stichting Tucht recht Banken). Consultation of these registers is part of the pre-employment screening and periodic in-employment screening. Consultation of these registers is not done by all bank employees themselves. Is a bank employee performing a check in the internal or external referral register? Then the employee only sees whether or not there is an entry in the register. Every financial institution has its own security department. This department assesses whether you can become a Rabobank employee or remain a Rabobank employee on the basis of the information in the aforementioned Incident Registers. We may share information contained in Rabobank's Incidents Register with other financial institutions. We only do so if this is permitted on the basis of the Protocol Incident Alert System for Financial Institutions (PIFI). Please consult the PIFI on the website of the Dutch Banking Association (<https://www.nvb.nl>). We also receive lists of persons from governments that we must record in our alert registers. Rabobank may not enter into an employment contract with these persons or have work done by them for Rabobank in any way. We may consult the incident registers and alert systems, but we may also record your personal data in these registers. If we record your data in these registers, we will inform you accordingly. Unless this is not allowed, for example because the police ask us not to inform you in the interest of their investigation. Do you disagree with this recording?

Then you can object to this or ask us to correct or delete your data. How you can do this is described in chapter 5.

Business reporting and analysis and development of the organization

We may use your data in business reports, surveys and for making analyses. In doing so, we may combine data that we have from you. E.g. in order to improve recruitment & selection reports, regarding numbers of vacancies, numbers of applicants and speed of filling vacancies. The results of analyses and accompanying advises are never traceable to you.

Legal obligations

We collect data about you based on specific (international) laws and regulations. According to the “Wet ter voorkoming van witwassen en financieren van terrorisme (WWFT)” (Money Laundering and Terrorist Financing (Prevention) Act) e.g. we have to know who you are. We also make a copy of your ID when you enter employment (based on legal obligations) and we need your social security number due to fiscal obligations.

Protection of the applicant’s vital interests

We may process data in order to protect your vital interests. E.g. regarding your medical data. Suppose you are in direct danger (unconscious) and unable to consent to the sharing of your medical data. These data are nonetheless vital to the immediate initiation of medical assistance.

3 We also process these special categories of personal data

Special categories of personal data are sensitive data. E.g. on health, criminal convictions or offences, racial or ethnic origin. We participate in incident registers and warning systems of the financial sector and in doing this may process data on criminal convictions or offences. The purpose of an incident register or warning system is to protect the interests of financial institutions, of you as an applicant and of our customers, e.g. by detecting fraud.

Are you asking us to store special categories of data about you, or are you publishing them yourself? In that case we will only process them if the purpose is clear, if there is a basis for processing and the processing is necessary for the purpose. Special categories of personal data like pictures of you or video material may also be processed. Think of a picture you may have added to your CV, but also CCTV footage from the office entrance. We only process these images for the purpose of protecting the property of Rabobank, its employees and for other security purposes.

3.1 This is how we process your personal data

Your personal data are only processed by employees who need access to them, given their function. The employees who are involved in your job application have a duty of confidentiality. We only reuse your data if the new purpose is related to that for which your personal data were initially collected.

E.g. when you apply for a job at a local bank and you are not hired, but we believe you may be a suitable match to a similar job at another location, we will inform you and send your data to the other location after you gave your permission.

3.2 We exchange these types of data with third parties

Sometimes we engage third parties who process personal data on our behalf.

E.g. external recruitment agencies (like YER, DPR Legal, Michael Page, Ebbinge & Company, Independent Recruiters) or a research agency. We can only involve third parties if this fits the purpose for which we processed your personal data and the involvement is sufficiently reliable. In addition, the third party can only get our assignment if it demonstrates that suitable security measures are taken and confidentiality is guaranteed.

If an assessment is part of your application, we will inform you in advance. Only after you have approved the report, we will save it in your application file.

3.3 This is how long we store your data

If you have made an online profile with us, you can use it again for another application at Rabobank. We can no longer view the data of your previous application at that time.

Was your application rejected? Then we will delete your personal data no later than four weeks after the end of the application process. This concerns all application data such as your cover letter, CV, e-mail exchange and any screening and/or assessment data.

If we do want to store your personal data for a longer period of time, for example to match them with future vacancies, we will ask your permission. You can always revoke this permission. We will delete your data no later than one year after the end of the application procedure.

Are you joining us? Then the application file will be kept until one year after the end of the employment.

Your data which were recorded within the framework of 'sourcing' will be deleted as soon as possible if they are no longer relevant for the purpose for which they were collected. If there has been no contact within six months, we will automatically delete all your personal data.

4 These are your rights with regard to processing of your personal data

Specific rights apply to the processing of your personal data.

4.1 Right to access and copy

You can ask us for access to your personal data which are stored by us. This can be information about you that is shown in your public profiles of social media, your uploaded CV and cover letter.

4.2 Right to rectification

If the personal data we store about you are incorrect, incomplete or in violation of the law, you can ask us to rectify it.

4.3 Right to be forgotten

You may request that your personal data that are stored by us be deleted if you object to these data being processed. E.g. if the processing is unlawful or no longer necessary for the purposes for which the data was collected.

4.4 Right to restriction of processing

In certain cases, you may ask to limit the personal data that is processed about you. This means that less data will be processed. This may occur, for example, when your CV is being updated.

4.5 Right not to be subject to fully automated decision-making

Fully automated decisions are decisions that are made by computers, not by people (anymore). According to the law, Rabobank may use automated decision making including profiling. At this moment we do not use fully automated decision making in the application procedure.

4.6 Right to dataportability

Data provided to us on the basis of a contract and/or with your consent may be transferred to another party. Transfer to another party can only happen if this is technically possible. Rabobank will transfer the data provided by you in a structured and readable form.

4.7 Right to object

You may object to the processing of your personal data. If you do so, we will make a new assessment to determine whether your data may indeed no longer be used for this purpose. Either way we always inform you about the motivation for our decision. If you don't accept the decision, you can lodge a complaint with the Data Protection Officer of Rabobank or the 'Autoriteit Persoonsgegevens' (Dutch Data Protection Authority, see also chapter 5).

4.8 Procedure regarding your rights

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

Depending on the number and complexity of the request, the period may be extended by a further two months. We will of course keep you informed about the progress of your request. Do the data to be provided also include data from third parties? If so, this third party may be asked in advance whether there are any objections to disclosure.

We may ask for a further specification of your request. We may also ask for identification, as we want to make sure we are providing information to the correct person.

In some cases we will not meet your request. For example, we do not delete the data if it is of significant importance to us or if there is a legal obligation to store it. We will inform you if this is the case.

5 Do you have a question or complaint? This is how you can contact us.

For questions or complaints about the processing of personal data, please contact the section where you applied or the Privacy Officer HR. The Privacy Officer HR can be reached via privacy.officer.HR@rabobank.nl.

If you are not satisfied with the answer, you can submit your complaint to the data protection officer of Rabobank via dpo@rabobank.nl. Are you still not satisfied with the answer? Please visit the website of the “Autoriteit Persoonsgegevens” (Dutch Data Protection Authority, P.O. Box 93374, 2509AJ The Hague).

5.1 Please be aware that this Privacy Statement may be subject to change

Our Privacy Statement may change from time to time. If there are new data processing operations, we will adjust the privacy statement accordingly. The current version of our Privacy Statement Recruitment & Selection Process can be found on our website. Previous versions can also be viewed there.



Rabobank