

Recruitment & Selection Procedure Privacy Statement

Rabobank would like to tell you more about how we handle your personal data, which we process across the world as part of Rabobank's Recruitment & Selection Procedure (hereinafter: R&S procedure) in our Global HR Information Solution system known as Workday. This statement covers every process in the R&S procedure carried out across the world by and on behalf of Coöperatieve Rabobank U.A. (Corporate domicile in Amsterdam, physical address: Croeselaan 18 (3521CB) in Utrecht CRUA) in every office in the Netherlands and abroad (including branches and REP offices (representative offices)). The CRUA can be defined as a controller.

How we obtain your personal data:

- You create a Candidate Home Account in Workday and fill in your details, including:
 - Mandatory:** country, first name and surname, how you found out about us, whether you have worked for Rabobank before, education, work experience, languages;
 - Optional:** address and place of residence, CV, skills, link to your LinkedIn profile;
- The following information is copied automatically from your LinkedIn profile: name, work experience, education, skills, recommendations and e-mail address;
- We also obtain data about you from third parties (such as a reference or an external (recruitment agency));
- We collect your data by means of sourcing (in-depth search for suitable candidates). We do this by using platforms such as CV databases and professional networking sites. If we approach you, we will tell you where we have found your details. We will ask your permission to contact you regarding vacancies or events. You are under no obligation to give your permission and can change or withdraw it at any time;
- As part of the pre-employment screening process, we also process personal data supplied by you or a third party (e.g., a former employer).



We process your personal data based on the following objectives and principles:

- The legitimate interests of Rabobank. This includes assessing whether you are suitable for the position and as part of sourcing;
- To enter into a possible (employment) contract and implement it;
- If we have a legal obligation, such as (potential) screening;
- We can process your details to produce business reports, surveys and analyses. The outcomes of the analyses and associated recommendations cannot be traced back to you.
- Your explicit permission (we do this if there are no grounds for processing your data and it is purely on a voluntary basis).

What do we mean by processing personal data?

Processing is the collective name for anything that refers to handling personal data. If you apply for a vacancy, we collect, use, and store your personal data. We do this to check whether you have the right qualifications for the vacancy, among other things.

What is sensitive personal data?

Sensitive personal data refers to confidential information regarding, for example, a person's health condition or criminal record, or data relating to racial or ethnic background.

As part of the pre-employment screening process, we may process data concerning a person's criminal record, if required. We have access to the financial industry incident databases and alert systems. The purpose of these databases and systems is to protect the interests of financial institutions, you as an employee or prospective employee, and our customers. One of the ways in which we do this is by identifying cases of fraud.



This means we only process personal data relating to a person's criminal background when assessing whether or not to hire that person, or if someone is applying for a specific, different position that requires additional pre-employment screening.

If you request that we record personal data relating to you or if you disclose this data yourself, we will only process the data if there is a clear purpose for doing so, i.e. if there are legitimate grounds and these are essential to the purpose at hand.

Why do we screen?

Like all other financial institutions, we screen future employees. We have a legal obligation to guarantee the security and integrity of the financial sector. We only do this in the ready-for-hire phase. We will let you know about the <exact> procedure and more specific which personal data we will process before screening takes place. Our screening procedures apply to all job applicants whom have reached the ready-for-hire phase.

Who has access to your personal data?

Your personal data is only used by employees of CRUA (including in and outside of the Netherlands) who require access to it for the purpose of considering your application to join the bank.

Do we reuse your data?

We only reuse data if the original objective corresponds to the new objective. For example, you apply for a position and the choice doesn't suit you, but we think you are suitable for another/similar position. Once we have obtained your permission, we will include you in the procedure for the other/similar position.



Which external parties have access to your personal data and why?

Workday is a product of Workday Inc. (6230 Stoneridge Mall Road Pleasanton, CA 94588 USA). The Workday server is located in Dublin and the back-up server is in Amsterdam. As a result, the General Data Protection Regulation (GDPR) applies and we have made agreements with Workday that are in line with GDPR. Your data is encrypted and only accessible to you and us.

There are less stringent privacy regulations in countries outside of the European Union. If you apply for a position at a branch, representative office or subsidiary of Rabobank that is located outside of the European Union, the Rabobank Privacy Codes apply. These Privacy Codes guarantee an appropriate level of protection for your personal data.

We may employ third parties to process data on our behalf, such as external recruitment agencies or research companies. Before such parties are engaged, we must first ensure they are sufficiently reliable. We may only engage parties if this is in keeping with the purpose for which we processed your personal data. Moreover, this other party can be engaged by us only if it reaches specific agreements with us, has demonstrably implemented appropriate security measures and guarantees that your personal data will remain confidential.

How long do we store your data?

We store your data no longer than necessary, and only in connection with the objectives for which we have obtained them. In addition, we take (local) legislation into account. Your data is stored during the application procedure. If you are turned down, all your personal data will be deleted no more than four weeks after the end of the application process. If we want to store your personal data for a year, we will ask your permission to do so. You can revoke your permission at any time. We delete the data that we process as part of sourcing if there has been no contact for twelve months.



What rights do you have regarding the processing of your personal data?

Right to inspect: All information in the context of the R&S procedure is stored in Workday. You can request to inspect the data that is stored about you. In your Candidate Home Account, you can also view your data and amend it if necessary.

Right to rectification: If your data is inaccurate or incomplete you can request us to rectify it. You can also amend it yourself.

Right to be forgotten: In some cases you have the right to ask us to erase your personal data. For example if one of the following grounds applies: the personal data are no longer necessary in relation to the purposes for which they were collected/processed, you withdraw consent (if there is no other legal ground for processing) or if your personal data have been unlawfully processed.

Right to restrict processing: In certain situations, you can request to restrict the personal data that is processed about you. This means that less data will be processed. An example where this might occur is when updating your CV.

Right to not be subject to a fully automated decision-making process: At the moment we do not use a fully automated decision-making process during the R&S procedure.

Right to data portability: You have the right to receive the personal data concerning you, which you have provided us. You will receive the data in a structured, commonly used and machine-readable format and you have the right to transmit those data to another controller without hindrance (if technically possible).

Right to object: You may object to the processing of your personal data that we carry out even though we have a legitimate reason for doing so. We will make a new decision to determine whether your data is in fact no longer of use. We will also inform you about our decision and motivations.



Procedure: If you want to exercise any of your rights mentioned above, please get in touch with the HR Privacy Officer: privacy.officer.HR@rabobank.nl, you will receive a response within one month upon receipt of your request. Depending on the complexity of the requests and the number of requests, this deadline may be extended by another two months if necessary. In some cases, we cannot meet the request. We are not required to delete data if the data is of significant interest to Rabobank or if there is a legal obligation to store it.

Do you have any questions?

If you have any questions about personal data processing please get in touch with the HR Privacy Officer: privacy.officer.HR@rabobank.nl.

If you have not received a response in good time or do not agree with the HR Privacy Officer's decision, you may contact the Data Protection Officer: dpo@rabobank.nl

If the answer you received does not result in an outcome that you accept, you have the option to submit a complaint to the Dutch Data Protection Authority (Postbus 93374, 2509AJ The Hague).

Do we ever amend our Privacy Statement?

Yes, our Privacy Statement may be amended from time to time. If new data processing systems come into force, we will adjust the privacy statement to reflect that. The latest version of our R&S Procedure Privacy Statement can be found [here](#). You can also see previous versions.

