

randstad group policy

summary
data protection
policy.



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This summary of our policy sets out Randstad's Data Protection principles and the conditions that must be satisfied in relation to the Processing of Personal Data.

Our Data Protection principles require that Personal Data must always be:

processed in line with DATA SUBJECTS' RIGHTS	processed based on LEGAL GROUNDS	processed in a TRANSPARENT MANNER
processed for LIMITED PURPOSES	ADEQUATE, RELEVANT AND NECESSARY	ACCURATE AND UP TO DATE
SECURE AND CONFIDENTIAL	KEPT NO LONGER THAN NECESSARY	TRANSFER TO THIRD PARTIES only if permitted or required by law and pursuant to right agreements

introduction

Personal Data is one of the core assets of Randstad's business.

Randstad is committed to the protection of Personal Data of (among others) its employees, candidates, clients and suppliers.

This policy incorporates the requirements of the new European Union General Data Protection Regulation (EU GDPR).

The policy sets a minimum compliance standard for Processing Personal Data and aims to provide adequate and consistent safeguards for the handling of Personal Data by all Randstad Group Companies.

This policy is consistent with and supportive of **Randstad's Business Principles**, especially principles 1, 4, 9 and 15:

1. We know and comply with the laws that govern our business, international human rights principles and Randstad's internal policies and procedures;
4. We ensure that our records (including those containing personal information) are created, used, stored and destroyed in accordance with law;
9. We respect the right to privacy, ensure that confidential information is kept confidential and we do not abuse the confidential information of others; and
15. We maintain and provide full, fair, timely, accurate and understandable contracts, records and financial information.

This policy applies to the Processing of Personal Data of (among others) Randstad's employees, candidates, clients and suppliers, by electronic means or in systematically accessible paper-based filing systems, whether such Processing is by a Randstad Group Company or by external Data Processors on the behalf of a Randstad Group Company.

1. policy and related documents

- 1.1 This policy sets out Randstad's Data Protection principles and the conditions that must be satisfied in relation to the Processing (including the obtaining, handling, storage, transfer and destruction) of Personal Data.
- 1.2 The type of information we may be required to handle includes details of (among others) Randstad's employees, candidates, clients and suppliers. This information may be held on paper, or on a computer or other media, and it is subject to certain specific legal safeguards specified in any local Data Protections laws and regulations and/or in this policy.
- 1.3 Depending on the relevant jurisdiction, Data Subjects may have rights with regard to how their personal information, or Personal Data, is handled. During the course of its activities, each Randstad Group Company Processes Personal Data. By adhering to this policy we recognize the need to treat all Personal Data in an appropriate and lawful manner, respecting the privacy rights and interests of each Data Subject.
- 1.4 This policy applies in conjunction with other policies and procedures established by Randstad Group Companies which may address legal requirements and business needs applicable in specific jurisdictions or other particular circumstances and including our Randstad Group Information Security Policy.
- 1.5 A corporate employee who suspects or has evidence that this policy has been breached in any way is expected to raise the matter with his/her line manager, with the legal department or with the Data Protection Office(r). If such local reporting procedures are likely to be ineffective or inappropriate, the employee can make use of the Misconduct Reporting procedure (available at randstad.com and local intranet).

- 1.6 Any questions about this policy or any privacy concerns, to exercise Data Subject rights, or to obtain further information about the safeguards we have in place, please contact the local Randstad privacy officer or reach out to privacyofficer@randstad.com.

2. data protection principles

This policy is not intended to prevent the Processing of Personal Data; it is to ensure that Processing is done in accordance with laws and regulations, fairly and without adversely affecting the rights of the Data Subject.

Anyone Processing Personal Data must comply with the following nine principles of good practice.

Personal Data must at all times be:

1. **Processed based on a legal ground;**
2. **Processed for limited purposes;**
3. **Processed in a transparent manner in relation to the Data Subject;**
4. **Adequate, relevant and limited to what is necessary in relation to the purposes for which they are Processed;**
5. **Accurate and, where necessary, kept up to date;**
6. **Kept no longer than necessary in relation to the purposes for which they are Processed and then destroyed or anonymized;**
7. **Processed in line with Data Subjects' rights;**
8. **Handled securely and confidentially;**
9. **Only transferred to other Randstad Group Companies or other third parties if permitted or required by law and pursuant a Data Processing Agreement and any additional required clauses.**

1. legal basis

- 1.1 For Personal Data to be Processed lawfully, certain conditions have to be met. These may include, a.o., that
- the Data Subject has given his or her consent to the Processing (e.g. by signing a consent statement when registering as a candidate); or
 - the Processing is absolutely necessary for operation of the business or the performance of a contract (e.g. collecting client data to provide services and deal with invoicing and payment or Processing employee's salary information and bank account details so that salaries could be paid); or
 - the Processing is in compliance with a legal obligation to which the Randstad Group Company is subject (e.g. reporting salary data of employees to social security or tax authorities);
 - the Processing is for the purposes of the legitimate interests pursued by the Randstad Group Company (e.g. physical security, IT and network security); or
 - the Processing is in emergency situations to protect the vital interests of the Data Subject (e.g. for security or health and safety reasons).
- 1.2 When we collect Sensitive Personal Data, it will usually be necessary to obtain Data Subject's express permission, for example by signing a form confirming that they consent to the collection and use of this information.

2. purpose limited Processing

- 2.1 Personal Data may only be Processed for the specific purposes notified to the Data Subject when the data was first collected or for any other purposes specifically permitted by applicable law.

This means that Personal Data must not be collected for one purpose and then used for another. If it becomes necessary to change the purpose for which the data is Processed, the Data Subject must be informed of the new purpose before any Processing occurs and it may be necessary to give them the opportunity to object.

- 2.2 For the Randstad Group the purposes may, amongst others, relate to the provision of our services, include regular temporary staffing and permanent placement of candidates, workforce management, Recruitment Process Outsourcing (RPO), Managed Services Programs (MSP), payroll services, and outplacement; to , payrolling, salary administration, HR and personnel management on non-corporate employees (temporary staffing employees, interim professionals, contract workers etc.), HR and personnel management of corporate employees, business Processes (e.g. employee directories, management information), commercial communications, and legal purposes (e.g. insiders regulations, safety and security).

3. transparent Processing

- 3.1 Unless this would involve a disproportionate effort or if the Data Subject is already aware of this, we need to ensure that the Data Subject understands **who** the Data Controller is (usually the Randstad Group Company they register with or that employs or contracts them), **for what** purposes the data is to be Processed, **how** it will be Processed, the identities of anyone **to whom** the data may be disclosed (such as clients and/or other Randstad Group Companies), **where** it will be transferred to or accessible from and what are their **rights** in relation to their information under applicable law.

4. adequate, relevant and limited to what is necessary in relation to the purposes

- 4.1 Personal data should only be collected and further Processed to the extent that it is required for our purposes and that have been notified to the Data Subject – whether this is recruitment, staffing, client management or employment administration. Any personal data which is not necessary for that purpose should not be collected in the first place.
- 4.2 The Processing of Personal Data should be restricted to Data that is reasonably adequate for and relevant to the applicable business purpose.
- 4.3 Reasonable steps should be taken to keep Personal Data in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data are Processed.

5. accurate and, where necessary, kept up to date

- 5.1 Personal data must be accurate and kept up to date. Steps should be taken to check the accuracy of any personal data at the point of collection and at regular intervals afterwards.
- 5.2 Personal data which is incorrect or misleading is not accurate and steps should therefore be taken to check the accuracy of any Personal Data at the point of collection and at regular intervals afterwards.

6. kept no longer than necessary

- 6.1 Retention periods for Personal Data must be defined and documented.
- 6.2 Personal Data that are not actively being used, Personal Data that we don't have a legal obligation to retain (e.g. for tax purposes); Personal Data that we are not permitted to retain it for legal or compliance reasons; or Personal Data that is not needed for historical purposes or statistical analysis, should be securely deleted.
- 6.3 Inaccurate or out-of-date data should be destroyed or deleted as soon as possible, unless such data must be retained under any statutory retention period.

7. processed in line with Data Subjects' rights

- 7.1 Personal data must be Processed fairly and in line with Data Subjects' rights.
- 7.2 Randstad Group Companies shall implement procedures to facilitate the following data subject rights in relation to his or her Personal Data, where and to the extent provided by applicable law:
 - Right to access
 - Right to rectification
 - Right to erasure
 - Right to restriction
 - Right to data portability
 - Right to object to the Processing
 - Right to not be subject to automated decisions, including profiling

8. secure and confidential

- 8.1 Randstad shall Process Personal Data in a way that ensure a level of security of the Personal Data appropriate to the risk, including protection against unauthorised or unlawful Processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures, in accordance with the Group Information Security policy and meeting the requirements of applicable laws.
- 8.2 Where required by applicable law, the Randstad Group Company concerned shall notify the Data Protection Authority following discovery of a Data Security Breach within the legal timeframe. Similarly, where required by applicable law, the Randstad Group Company concerned shall notify the affected Data subject, unless a law enforcement or supervisory authority determines that notification would impede a criminal investigation or cause damage to national security. In such event, notification shall be delayed as instructed by such authority. Randstad shall respond promptly to inquiries of Data subjects relating to such Data Security Breaches.
- 8.3 Where required by applicable law, Randstad Group Companies shall carry out and maintain a record of Data Protection Impact Assessments on new initiatives likely to result in a high risk to the privacy and Data Protection rights of individuals.

9. transfers of Personal Data to third parties

- 9.1 Personal Data may only be transferred to another entity (whether within the Randstad Group or outside it) if this transfer complies with the Data Protection principles and the other rules set out in this policy and/or in any applicable Data Protections laws and regulations. As a consequence, such a transfer may only take place if this is in line with the business purpose for which the data was collected, and if the transfer is necessary for this purpose.

9.2 Processing carried out by a Data Processor on behalf of a Randstad Group Company

Where Processing is to be carried out by a Data Processor on behalf of a Randstad Group Company, a written agreement or another legal act that is binding on the Data Processor should be in place. The Data Processor should accept the contractual obligations to ensure compliance with this policy and/or with such other contractual obligations as necessary to ensure an adequate level of protection for the transfer and any subsequent Processing (including any onward transfers).

9.3 Transfers of Personal Data to a Data Controller

In some instances it may be necessary to transfer Personal Data to other third parties which do not act as Data Processors for Randstad. Such a transfer may be permitted if the Data Subject has given his or her consent (e.g. sharing Personal Data of candidates to Clients), or if it is necessary for the performance of a contract with the Data Subject (e.g. a transfer to clients, pension funds and insurance Companies), to comply with mandatory provisions of national law (e.g. a transfer of Personal Data to social security and tax authorities or labor inspection), to protect legal rights (for example in litigation), or in emergency situations where the transfer is necessary to protect the vital interests of the data subject (e.g. for security or health and safety reasons). In other cases, the legal department or the Data Protection Office(r) of the Randstad Group Company involved should be consulted before Personal Data is transferred to a third party.

9.4 Cross-border transfers of personal data

When implementing this policy, Randstad Group Companies shall address any local legal requirements imposing specific conditions for international transfers of Personal Data.

9.4.1 Specific rules for the European Economic Area

Personal Data may only be transferred from an European Economic Area (EEA) country to countries outside the EEA ('third countries') deemed to ensure an adequate level of protection by the EU Commission. At the time of publication of this policy, these include, a.o. Andorra, Argentina, Canada, Switzerland and New Zealand. The complete and updated list of decisions on the adequacy of the protection of personal data in third countries by the the EU Commission can be consulted at http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm.

If the third country does not offer this level of protection, Personal Data may, as a general rule, only be transferred to this third country, whether to another Randstad Group Company or a third party, if the Randstad data exporter and the data importer enter into standard contractual clauses which have been approved by the European Commission. Additional local requirements may apply. Please contact the legal department and/or the Data Protection Office(r) of the Randstad Group Company before Personal Data is transferred to a third country.

10. obligation towards Data Protection Authorities

- 10.1 Each Randstad Group Company will respond timely and adequately to any request from the Data Protection Authority. Questions may relate to any notifications of data Processing with the Data Protection Authority or more generally on compliance with the applicable Data Protections laws and regulations. Randstad corporate employees receiving such a request from the Data Protection Authority will contact their Data Protection Office(r) or Company's legal department in order to involve them in the communication with the Data Protection Authority.

appendix I

definitions

Data is information which is stored electronically, on a computer, or in certain paper-based filing systems.

Data Controller means the entity who decides why and how Personal Data is Processed. It has a responsibility to establish practices and policies in line with the Data Protections laws and regulations. Randstad and its Group Companies are the Data Controller of most Personal Data used in our business.

Data Processor means a separate legal entity from the Data Controller that Processes Personal Data on its behalf. Employees of Data Controllers are excluded from this definition but it could include suppliers or customers or other third parties that handle Personal Data on our behalf. In some situations a Randstad Group Company may act in the role of Data Processor, e.g. for some MSP or payroll services, either on behalf of a client, a supplier or another Randstad Group Company.

Data Protection Authority means the official Data Protection authority or commission established under the applicable Data Protections laws and regulations in any country where a Randstad Group Company is located.

Data Protection Impact Assessment means the assessment of the impact of a processing operation on the protection of personal data.

Local Data Protection Office(r) means the person or department within a Randstad Group Company or country who has the responsibilities listed under "Local Data Protection Office(r)s" in section 7 of this policy.

Data Users include corporate employees, employees of any Randstad Group Company who are involved in providing services, whether externally or internally, and whose work involves using Personal Data. Data Users have a duty to protect the information they handle by following our Data Protection and security policies at all times.

Personal Data is any data that directly or indirectly relates to an individual (e.g. name, email, telephone number, birth, gender, unique identifiers, race, religion, health, trade union membership, grades, opinion, experience) and that can be captured in any format (e.g. paper, digital, photo, video, sound).

Processing (or to Process) refers to any activity that involves use of the Personal Data. It includes obtaining, collecting, recording or storing the Personal Data, or carrying out any operation or set of operations on the Personal Data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring or otherwise making available Personal Data to other entities (whether other Randstad Group companies or not).

Sensitive Personal Data includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. Sensitive Personal Data can only be Processed under strict conditions, and will usually require the express consent of the person concerned.

Other information, such as Social Security Number or bank/credit card details, may be equally confidential even though not classified as "sensitive".

In some countries, photos and video images may qualify as sensitive Personal Data as they can reveal a person's racial or ethnic origin and/or religious or similar beliefs.

