

# Data protection – privacy notice

## Introduction

INSO, registered under the Chamber of Commerce number 73728489 processes information on its employees on a daily basis. In doing so, INSO shall comply with the relevant legal provisions. We respect the privacy of all our employees and shall not collect and/or process any personal data of our employees as long as it does not serve a legitimate purpose.

In this privacy statement, INSO informs its employees about how it handles the data it collects from and about its employees and why.

Naturally, this data is handled and protected with the greatest possible care. In doing so, INSO observes the applicable laws and regulations, including the General Data Protection Regulation (GDPR) and the GDPR Implementation Act.

“Employee” in this Privacy Notice means temporary, full-time and part-time contract employees, interns, contingent workers, retirees, and former employees.

## Data controller

The data controller responsible for processing the personal data of all employees who work or have worked for INSO is INSO, established in (2511 BH) The Hague at Grote Markstraat 43C. For questions, requests and/or comments on this privacy statement and/or on the privacy policy within INSO please contact the Director of Operations.

## Register of processing activities

INSO shall keep a register of processing in respect of all personal data. The register not only maps out the processes: for each process, it also records which personal data are processed and the basis on which they are processed. It also provides insight into which applications are used and which agreements have been made with third parties (processing agreement/security measures).

## Purposes and legal grounds for processing personal data

INSO collects various personal data about its employees and for various business purposes that are necessary:

- for the performance of the employee’s agreement, including the administration of the employment relationship, such as for the purposes of operating payroll and administering employment benefits or maintaining an employee directory;
- for INSO to pursue its legitimate interests, including for the purposes of: business process execution and internal management, travel and expense management, business reporting, systems reporting and access, analyses, performance review purposes, training, administering compensation programs, disciplinary purposes and other business purposes related to the management of the workforce of INSO, for facilities and IT systems and infrastructure management, safeguarding the security of our infrastructure, premises, assets and office equipment, including for the prevention of criminal activity; and
- to meet legal obligations under tax, social security and employment laws (health, safety & security).

## Categories and sources of personal data

The categories of personal data that INSO processes for these purposes are – or may be – the following data:

- Name(s), surname(s), address, place of residence, sex, date of birth, marital status.
- Telephone number and e-mail address.
- BSN number.
- Copy of ID, nationality.
- Curriculum vitae, diplomas, and other information on education.
- Data on availability, work history and leave.
- Salary details and bank account number.
- Portrait photo for inclusion in the website.
- Registration number (only if there is a lease agreement).
- Other matters as required by law.

Most of the employee personal data INSO processes has been directly acquired from the employee. Some personal data may be provided by [Note Buren: include and complement if necessary your managers, HR, benefits providers or others.

#### *Special categories of personal data*

Special categories of personal data are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, and the processing of genetic data, biometric data for the purposes of identifying an individual, data concerning health or data concerning a natural person's sex life or sexual orientation. INSO processes limited amounts of special categories of employee personal data in order to comply with its legal obligations, when necessary for the purposes of carrying out obligations and exercising specific rights in the field of employment and social security laws. Processing of special categories may also be necessary to protect the vital interests of individuals (e.g. health and safety) or for the establishment, exercise or defense of legal claims. The special categories of data that INSO processes may include data concerning employee's physical and/or mental health in order to monitor sickness absence and to inform decisions regarding fitness for work. Furthermore, INSO may process limited amounts of biometric data for unique identification of a person regarding security and/or authentication purposes.

#### *Application details*

INSO collects and processes data from job applicants. This is done by during the application processmail, by e-mail, by phone, and by applications made through social media including LinkedIn and Facebook, by word of mouth and in personal conversations with the applicant concerned.

The data that INSO collects in the context of job applications are the name, date of birth, address, e-mail address, telephone number, education undertaken by the person concerned, work experience of the person concerned and character traits and skills of the person concerned.

These personal data are processed by INSO for the purpose of selecting the right applicant for the job vacancy.

INSO respects the privacy of its employees and job applicants and ensures that the personal data employees and job applicants provide to INSO is treated confidentially.

#### **Sharing of personal data with third parties**

INSO does not share personal data with companies, organisations and individuals outside INSO, other than for the purpose of executing a contract, with the consent of the data subject (only if it is clear to the employee what the consent is for and what the consequences are), for external processing, for legal reasons, because of legal obligation(s).

### **Delivery of items**

INSO provides the necessary personal data, such as address data, to a courier or delivery company in order to have items delivered to the data subject.

### **With consent or at the request of**

With consent of or at the request of the data subject, INSO shall transfer personal data to other parties. The consent is only valid if it is clear what the consent is for and what the consequences are.

### **Legal obligation**

INSO shall share personal data as necessary to comply with applicable laws, regulations, legal proceedings or legitimate requests of governmental authorities.

### **For external processing/execution of the contract**

INSO cooperates with various financial and HR service providers. INSO has given these third parties access to that of the above personal data which is necessary for them to carry out their assignment(s).

INSO shall ensure that these third parties have all signed a processing agreement and that they comply with the confidential treatment and adequate security imposed on them by INSO.

Furthermore, on the basis of the foregoing, INSO may share personal data with, among others, NGO partners, vendors, agents, service providers, auditors, lawyers, consultants, law enforcement and other public authorities (such as tax and social security bodies), the police, prosecutors, courts and tribunals. INSO may also disclose employee personal data to banks, pension and benefits administrators and insurance companies, hotels, travel agencies, airlines and telecommunications operators. Where necessary, INSO will ensure that appropriate contractual measures are in place to ensure the protection of personal data.

Some of the third parties that INSO engages to process employee personal data are located outside the European Economic Area. When we transfer your personal information to a third party in a country outside the European Economic Area that is not considered by the European Commission as providing an adequate level of protection to your personal data we will only transfer your personal data after having executed Standard Contractual Clauses providing for appropriate or suitable safeguards.

### **Retention of personal data**

INSO will keep and process personal data of an employee only for as long as is necessary for the purposes for which it was collected in connection with his employment with the INSO, unless INSO has a legal right or obligation to retain the data for a longer period, or the data is necessary for the establishment, exercise or defense of legal claims.

Personal data of job applicants shall be deleted no later than four (4) weeks after the end of the application process. Unless the person concerned explicitly agrees otherwise, in which case the personal data will be deleted no later than one (1) year after the end of the application process.

## **Rights of data subjects**

The data subjects whose personal data are processed by INSO have the right to: access, correction or addition, deletion, restriction of processing and data portability of personal data. Furthermore, the persons concerned have the right to object.

### **Right of access**

A data subject may at any time ask INSO whether it is processing their personal data. If INSO processes the data subject's personal data, the data subject shall have the right to access that personal data. The data subject may also ask INSO to provide him/her with a copy of the personal data. INSO shall in principle comply with that request.

### **Right to correct or supplement**

If the data subject can prove that the data that INSO holds on him/her is incorrect or incomplete, the data subject has the right to request INSO to correct or supplement that data. INSO shall comply with that request, on the understanding that only those data that are objectively verifiable as being incorrect or incomplete may be corrected or supplemented.

### **Right to forget/delete**

If the data subject can demonstrate that the storage or processing of (certain) personal data is not necessary, he/she can request INSO to cease the storage or processing of that personal data and/or to delete the personal data in whole or in part. INSO shall in principle comply with that request, it being understood that the request to cease storing or processing only relates to those data that are objectively not necessary.

### **Right to data portability**

The data subject shall, where appropriate, have the right to receive his personal data in a machine-readable format.

### **Right to object**

To the extent that the processing of data subject's data is based on the legitimate interests of INSO (and not on other grounds for processing), the data subject shall have the right to object to the processing of such data on the basis of his/her personal situation.

### **Submission of requests**

Data subjects may address their requests concerning the retention and/or processing of their personal data to the Director of Operations. INSO may ask the data subject to identify himself/herself.

It is not a statutory or contractual obligation to provide personal data or a condition to enter into an agreement with an employee. However, if an employee chooses to not provide INSO with his personal data and/or provides incomplete personal data, INSO may not be able to engage in or continue a contractual relationship with the employee as the personal data is required for administrative purposes and/or to fulfill statutory requirements.

### **Complaints**

Data subjects are at all times entitled to lodge a complaint about the processing of personal data by INSO with the Dutch Personal Data Authority (<https://autoriteitpersoonsgegevens.nl/nl>).

**Finally**

This privacy statement complies with the requirements of the General Data Protection Regulation (GDPR) and the GDPR Implementation Act. INSO reserves the right to update this privacy statement as necessary. By signing the employment contract, the employee agrees to the contents of this privacy statement, which forms an integral part of it.