

# Privacy Policy

## Who are we?

Right Management Nederland B.V. is located in Diemen, Diemerhof 16-18. We are responsible for processing your data.

## What can you expect from us?

Your privacy is important to us. We therefore place great care in the responsible, transparent and safe handling of data from our candidates, clients, employees, suppliers and those visiting our website. We do this in accordance with privacy laws and regulations, including the European Union's General Data Protection Regulation (GDPR).

We never sell your information to third parties. We do, however, use the services of other parties that process data on our behalf. We have processing agreements with these parties in place so that they also handle your personal data with care. After all, we remain responsible for protecting your data.

In certain circumstances we will share data with other parties, where we are required by law and regulation – for example with the tax authorities – or on the basis of a contractual provision. It may also be necessary to share your data with other parties as part of our service. For example, when we introduce you to a company.

If we pass on personal data to organizations in countries outside the European Economic Area, such as our American parent company and affiliated ManpowerGroup companies, we will ensure that there are adequate safeguards for the protection of your data. For the technical measures we use our Information Security Management System (ISMS), based on ISO27001. Information about further adequate safeguards can be found via the contact details at the bottom of this privacy statement.

In line with our ISMS policies and procedures and our data privacy management system, we take great care in avoiding data incidents. Should a data incident occur and be classified as a data breach, data subjects and the privacy Authority will be informed if the seriousness and risk of the data incident makes this necessary.

We do not store your data longer than strictly necessary for the purpose it was obtained.

## When do we process your personal data?

We process your data from the moment you:

- visit one of our websites;
- register for career guidance, coaching, a workshop, an assessment or an event;
- enter your details on our online career portal or on our website;
- use our services in any other way.

We may process information about you that we did not receive directly from you. Even then we process this data only for a predetermined and justified purpose.

### **What do we do with your data?**

That depends on how we know you. If you only visit our website then we process limited information compared with the data processed when you use our services. We have taken this into account in the overview below. It is therefore possible that multiple categories apply to you. In addition, we also inform you how we handle your data in specific situations, such as when you participate in a workshop.

We request your prior approval for certain processing. If you do not give permission and / or object to this processing, this may have consequences for the service we provide to you.

### **I am guided in my career (and/or career transition) or going through an assessment**

With the help of assessments and personal coaching, we guide you in self-awareness in the workplace, making the right career choices or in finding another job. For example, a client may ask us to guide you as their (former) employee in your career transition. Our career professionals are ready to support you and advise you in the process of finding a new job.

Our assessments are used for various purposes, for example for your development, to determine your career opportunities or to select you for another position.

We are a member of the Dutch Organization for Vitality, Activation and Career (OVAL) and we adhere to their code of conduct. We are also affiliated with the Netherlands Institute of Psychologists (NIP) and we follow the rules of conduct laid down in their professional code.

When you access these services, we process your data in the following ways:

- If you contact us, for example via e-mail, social media or by telephone, we may ask for your contact details. We do this to handle your question or complaint and to possibly be able to approach you later with additional information. Your data is only accessible to those within the organization who deal with your question or complaint.
- If you do an assessment center with us, we use the personal data supplied by the client and yourself. We save the results for up to twelve months after completion of the assessment center. This data is only shared with your current or future employer, after your permission (in accordance with NIP professional code). We may use suppliers based outside the EEA, depending on the assessment your organization has selected.
- In order to support you in your career choices, we store personal data such as resumes and interview reports. We store this data in our internal international application on a server in the USA and on our internal SharePoint environment up to twelve months after completion of your consulting process.
- To support your personal development and employability with training, education and assessments, we use the personal data provided by you.

- We continuously improve our services with the help of analysis and reports. We report on this to clients. We avoid using personal data as much as possible, but sometimes we are required to use a limited number of data. Where possible, we aggregate data and make it anonymous so that you cannot be identified.
- The use of personal data may be necessary for legal purposes.
- With regard to legal files, it is important to be able to continue to use relevant personal data and to keep it where relevant.
- To enhance the security of our network and information systems, we process your IP address and user data. We store this data up to six months.
- We use various IT resources, such as e-mail, to communicate with each other and with you. We keep a history of this as long as it is relevant for follow-up, accountability and security. We use (cloud) suppliers outside the EU for this.
- We conduct surveys, for example Net Promotor Scores (NPS), to measure how you experience and use our services. Sometimes we also ask you to share your name and contact details, so that we can follow up the results and possibly inform you about this later. Your participation in these surveys is entirely optional.

### **I am a website visitor**

When you visit our website, we do not know you by name at first. When you ask us a question via, for example, a form, we do process your personal data. We also treat your IP address as personal data.

- To enhance the security of our network and information systems, we process the IP address and user data, among other things. We store this data up to six months.
- If you contact us, for example via e-mail, social media or by telephone, we may ask for your contact details. We do this to handle your question or complaint and to possibly be able to approach you later with additional information. Your data is only accessible to those within the organization who deal with your question or complaint.
- We use various IT resources, such as e-mail, to communicate with each other and with you. We keep a history of this as long as it is relevant for follow-up, accountability and security. We use (cloud) suppliers outside the EU for this.
- To give you an even better user experience and to better tailor our offer to you, we use your personal data when you give us permission to do so. We do this through cookies and similar technology. You can learn more about this in our cookie policy.

### **I am a client contact, supplier or other relation**

If you are a client representative, supplier or 3<sup>rd</sup> party relation of ours, we process your personal data, for example for the preparation or processing of an invoice.

- For the performance of internal controls, such as audits, we process relevant data from clients, employees and candidates.
- The use of personal data may be necessary for legal purposes.

- With regard to legal files, it is important to be able to continue to use relevant personal data and to keep it where relevant.
- To enhance the security of our network and information systems, we process the IP address and user data, among other things. We store this data up to six months.
- If you contact us, for example via e-mail, social media or by telephone, we may ask for your contact details. We do this to handle your question or complaint and to possibly be able to approach you later with additional information. Your data is only accessible to those within the organization who deal with your question or complaint.
- We use various IT resources, such as e-mail, to communicate with each other and with you. We keep a history of this as long as it is relevant for follow-up, accountability and security. We use (cloud) suppliers outside the EU for this.
- For our financial administration, invoicing and for checking and approving invoices, we process relevant data and store it for seven years due to legal obligations.
- To give you an even better user experience and to better tailor our offer to you, we use your personal data if you give us permission. We do this through cookies and similar technology. More about this in our cookie policy.
- We conduct surveys, for example Net Promotor Scores (NPS), to measure how you experience and use our services. Sometimes we also ask you to share your name and contact details, so that we can follow up the results and possibly inform you about this later. Your participation in these surveys is entirely optional
- We continuously improve our services with the help of analytics and reports. We report on this to clients. We avoid using personal data as much as possible, but sometimes we are required to use a limited number of data. Where possible, we then aggregate data and make it anonymous so that you cannot be identified.

### **I work as a self-employed associate consultant**

If you have accepted an assignment through us as a self-employed associate consultant, we will process your personal data. For example, for drawing up the hiring agreement.

- If you use a business laptop and / or mobile phone from us, we will store your personal data. We save this information up to seven years after the end of your agreement.
- To assign you a client, we store a number of relevant data from you. If necessary, we share this information with a client. We store your data up to seven years after the end of your agreement.
- For the performance of internal controls, such as audits, we process relevant data.
- To be able to pay your invoice, we process your invoice and bank details. We store this data up to seven years due to legal obligations.
- The use of personal data may be necessary for legal purposes.
- With regard to legal files, it is important to be able to continue to use relevant personal data and to keep it where relevant.
- In order to be able to account for our invoices to our clients and to comply with contractual obligations, we keep record of the hours we have deployed you. We use your personal data for this. We use a legal retention period of seven years.

- To enhance the security of our network and information systems, we process the IP address and user data, among other things. We store this data up to six months.
- If you contact us, for example via e-mail, social media or by telephone, we may ask for your contact details. We do this to handle your question or complaint and to possibly be able to approach you later with additional information. Your data is only accessible to those within the organization who deal with your question or complaint.
- We use various IT resources, such as e-mail, to communicate with each other and with you. We keep a history of this as long as it is relevant for follow-up, accountability and security. We use (cloud) suppliers outside the EU for this.
- To secure access to our systems, we store your username, business contact details and the organization you work for. We store data about the activities that you carry out up to six months after the assignment ended.
- To learn from each other and to work together, we offer opportunities for internal knowledge sharing. Your name, contact details and position will then be shared.
- As soon as you get started, we share information about you with the client. For example, to have an access pass made for you. This can differ per client.

### **Automated decision making**

We do not use processes in which automated decision-making (including profiling) takes place.

### **Permission**

Have you granted (explicit) permission to process your data? Then you have the right to withdraw this permission at any time. Please note: if you withdraw your consent, the previous processing of data that we have done with your consent will remain lawful.

### **What are your rights?**

You have the right to:

- know what personal data we have recorded about you;
- adjust your personal data or have it deleted;
- request a limitation on the processing of your personal data;
- ask us to transfer your personal data to another party;
- object to the processing of your personal data that we consider necessary to protect our interests, this may have consequences for the way that we provide our services;
- object to the processing of your personal data for direct marketing purposes;
- not be subject to a decision based on only automated processing (including profiling) that has legal consequences for you or that has a major impact on you;
- submit a complaint to the Dutch Data Protection Authority (AP) – or another supervisory authority – about how we handle your personal data.

## About this privacy statement

We can change this privacy statement, for example when we process more or other personal data from you, or when we are required to do so to comply with privacy laws and regulations. We advise you to take note of changes regularly. If there are major changes to our privacy statement, we will inform all those involved. You can always request previous versions of the privacy statement.

This version was made on May 16, 2023.

## Do you have a question or request?

Do you have a question or a request?

If you want to change or delete your data, which you cannot perform yourself, or to exercise any other of your data privacy rights, [you can do so via completing this form](#). You can change to English at the top right of the page. We will process your request as soon as possible and at the latest within 30 days of receipt of the request.

For other questions and/or complaints, you can contact our Data Protection Officer directly.

E-mail address: [dpo@manpowergroup.nl](mailto:dpo@manpowergroup.nl)

Postal address: ManpowerGroup Netherlands B.V.

Attn: Data Privacy Officer

Diemerhof 16-18

1112 XN Diemen

## Report data breach

Do you believe you have found a weak spot in one of our websites or systems? Or has the security of personal data been infringed? Then please contact the privacy team via e-mail:

[dataprivacy@manpowergroup.nl](mailto:dataprivacy@manpowergroup.nl) or via telephone number +31 20 6602222. We kindly and strongly request that you do not spread this information any further to allow us to act quickly and ensure the impact for those involved will be reduced to a minimum.