

Privacy statement for applicants

At Rowlands we attach great importance to protecting the personal privacy of all people whose data we compile. We treat and protect this data with the utmost care, in accordance with the applicable laws in Luxembourg¹.

We do everything to protect the data supplied to us against loss, destruction, publication, unauthorised access or improper use.

In this privacy statement we explain who we are and why we require your personal data, which data we compile, how and for how long we process it, who we can pass it on to, what your rights are and how you can exert them.

This privacy statement is intended for you if you wish to make use of our services and that;

1. You apply at Rowlands for a recruitment at one of our customers.
2. You transmit us your spontaneous application as part of your search for work

A. Who we are

Rowlands, division of Randstad HR Services, situated in L-2361 Strassen, 5 rue des Primeurs, is responsible for the processing of your personal details (Controller in the sense of the GDPR)

B. When do we compile your personal details?

We start collecting your personal data the moment you send us this data by e-mail in response to a job offer published by our services (on our site or on other work related websites) and, even outside the context of any job offer, if you register in our office or if you transmit us your data via our website or if you register in another way (e.g. job fair) to be able to make use of our services as part of your job searching.

We can also compile your data if you have made this public on public/social media (e.g. LinkedIn) which could indicate that you are interested in work-related services. In this case, we will ask you first whether you are interested in registering with us in accordance with our conditions and taking account of this privacy statement. If you are not interested, we can process a limited number of data in order to meet your wish not to be approached by us.

C. Why do we need your personal details?

¹ These are the Act of 2 august 2002 as modified on the protection of privacy with regard to the processing of personal data and Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons in relation to the processing of personal data and the free movement of this data (GDPR).

We compile your personal details for the objectives mentioned below and will not use this data for other purposes without informing you in advance and, if necessary, asking your permission.

We use your data for the execution of the HR service for which you registered with us, including employment-finding, temporary work, recruitment & selection, personal development and availability, wage administration and personnel management.

More specifically, we use your personal details to, as the case may be,

1. Include you in our applicant database we look through to select suitable candidates for the jobs we recruit for (as employee at one of the customers of Rowlands).
2. Be able to determine your profile and be able to assess your suitability as candidate for the jobs we are recruiting for. Here we may use, among others, the results of tests you have taken (online personality tests, language tests, assessments, etc.) and (online) reference checks we only carry out with your explicit permission at the people/companies you indicated. We may also ask you to provide more information about yourself on a voluntary basis to increase your chances of finding work.
3. Be able to proactively introduce your profile, including your cv, to customers of Rowlands.
4. Offer you interesting vacancies and job offers by phone, e-mail, text message or other media. You can manage your contact details yourself via your consultant at your Rowlands office.
5. Provide you with information about the services and other activities of Rowlands (e.g. job fairs or other events that may interest you) and be able to better align this to your wishes and competencies.
6. Promote your personal development and availability by offering, among others, short training courses, guidance, workshops, etc. at one of the partnerships of Rowlands itself or a third party.
7. Send you newsletters, invitations to events and other informative messages of Rowlands that are in our opinion of interest to you
8. Observe legal obligations, such as, among others, correct personal identification, application of tax and social security legislation, combating fraud, illegal employment and terrorism, applying national and international sanction legislation, etc.
9. Monitor and measure the quality of our services. To this end we ourselves, or a third party we have commissioned to do so, may ask you to take part in surveys and use the obtained information and process it to improve the quality of our services.

10. Meet management objectives, including providing management information, carrying out internal checks to prevent fraud and to carry out (internal/external) audits and accounting audits.
11. Be able to provide statistical information for studies of interest to Rowlands or our sector federation FR25 (Federation for Recruitment Search & Selection) ;
12. Guarantee company safety. To this end we may, for instance, check your identity when accessing one of our offices. If you have access to our IT-systems, we can also check your activities in our systems to prevent misuse of the information of our databases and to protect our interests and those of all people included in our databases.
13. Allow you to exert your rights (also see point H) and to indicate later on why we acted upon these rights.

We use and process your personal details, depending on the type of processing, on the basis of:

1. **your consent:** where appropriate, you give us your consent, for taking your references with people/companies you gave.
2. **our (pre)contractual relation :** if you wish to make use of our services we need certain personal data necessary to help and support you in your search for work. Without this data, it's impossible to make use of our services.
3. **the legal obligations of Rowlands:** our service is subject to many legal obligations. We require all information on time and for the full duration of these obligations that is necessary to be able to meet these obligations or to be able to indicate during a check that we met them.
4. **the legitimate interest of Rowlands or of a third party:** if necessary, we use your details to meet justified interests of Rowlands or of third parties. This can, for instance, be done for access or internal control and audits to guarantee the safety and continuity of our systems and partnerships. This legitimate interest is also present when we need to file your data as part of establishing, implementing or substantiating a possible legal procedure. Or when we send you interesting informative messages as part of our services.
We also collect and use certain additional personal data (e.g. references, application letters, a complete resume,...), that is not compulsory for the execution of our services, but may be desirable to better align our services to your wishes and qualities or to meet more specific questions or obligations coming from specific functions, based on a legitimate interest of Rowlands.

D. Which of your personal details do we process?

We process the personal details that are required for our service. As indicated above, some of these details (e.g. identity, education, work experience, etc.) is obligatory to be able to make use of our services. Additional data (e.g. references, personal preferences for specific jobs, application letters, complete cv, etc.) is not compulsory but may be desirable to better align our services to your wishes and qualities or to meet more specific questions or obligations coming from some specific functions. .If you choose to provide us with your information, we can use it and share it with customers as part of your employment-finding or employment.

You are responsible for the correctness and relevance of the data you provide us with. It's best to pass on any changes in your personal details as soon as possible to your consultant at Rowlands office.

It concerns, among others, the following personal details:

1. name, address, e-mail address, telephone number and other contact information;
2. place and date of birth, sex, marital status;
3. nationality and, if necessary, proof of identity, work permit and residence permit (inspection obligatory on the basis of legislation of the employment of foreign employees);
4. curriculum vitae (cv), cover letter, information about education/training courses and work experience, data made public (including social media), information you give to our consultant or our customer during (job) interviews with them;
5. photos and video introduction (on a voluntary basis only);
6. data, including results, about training courses and education and/or tests/assessments you took yourself or via Rowlands;
7. other information that may be of importance as part of the assessment of your suitability as a candidate, such as certificates and references (with your consent only);
8. data about your availability and holiday periods;
9. evaluations of your knowledge, skills, attitude, etc. ;

Which sensitive personal details we may possibly compile:

1. excerpt of your criminal record: we only ask this if this is a statutory requirement for Rowlands or for the customer we employ you with.

2. health data: we do not process any health data. If you pass on personal details about your health condition voluntarily, we will only register this data at your explicit request and only if it could have an impact on your search for work and the tasks to be carried out by you.

E. Who do we share your personal details with?

Only if necessary for the execution of your job service or employment, the realisation of objectives mentioned under point C, observing the statutory requirement (of Rowlands or of a third party) or the protection of a justified interest (of Rowlands or of a third party) can Rowlands transfer some of your personal details:

1. to other partnerships of the Randstad group in Belgium and Luxemburg Rowlands belongs to, for among others:
 - range of supporting activities as part guidance towards finding work/professional development (workshops, job offer, etc.);
 - intragroup service (administrative tasks such as invoicing, IT services, etc.);
 - inspection and complaints management (legal services)
2. to the holding company of Randstad (of which Rowlands is part), or other partnerships in the Randstad group for among others:
 - management information;
 - internal audits;
 - internal services;
3. to customers of Rowlands, or their clients, agents or representatives, for among others:
 - selection of suitable candidates for filling a vacancy as temporary worker or permanent employee;
 - proactive presentation of your profile and cv;
 - billing of the service;
 - customer audits;
4. to suppliers of Rowlands, for among others:
 - providing services or carrying out tasks and orders on behalf and at the expense of Rowlands (e.g. IT providers, cloud providers, employers' social-accounting secretariat, research bureaus, entrance security access, etc.);
5. to our auditors, audit and certification agencies, for among others:
 - audit of our annual accounts;
 - obtaining and preserving certain certificates;
 - audit of subsidy dossiers (e.g. European Social Fund);

6. to (the audit firm or research bureau of) FR2S (Federation for Recruitment Search & Selection), for among others:
 - scientific research;
 - satisfaction surveys;
 - statistical purposes;
7. to various public bodies, such as, among others:
 - national inspection services;
8. to all other third parties we are obliged to by law, court order or decree.

Rowlands will not sell, lease or make your personal details available for commercial purposes to third parties, unless you have given prior consent.

As Rowlands develops its business, Rowlands might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, your personal details and other information may be part of the transferred assets.

If our suppliers process your personal details for Rowlands, they act as processors as laid down in the GDPR. We conclude a processing agreement with these processors and do everything in our power to ensure that they sufficiently protect your personal details.

Your personal details can in certain cases be passed on outside Belgium and the European Union. Rowlands takes the necessary contractual and technical security measures to ensure that all personal details passed on are adequately protected against loss or unlawful processing. For further questions about this, contact the Data Protection Officer (see further).

F. How long do we keep your personal details?

We guarantee that we do not keep your details for longer than is required by law or in the internal regulations applicable within our businesses.

All personal data we use in order to support you in your search for work (Cv's, education, work expectations,..) remain actively available in our database as long as we stay in contact concerning your search for work.

After a two year period of inactivity since our last contact, your personal data will be deleted from our active database. Subsequently, we will continue to file your data in passively during a period of three years due to certain statutory periods of limitation, the treatments of complaints, and statistical, audit and control purposes.

G. Security measures?

Rowlands does everything in its power to optimally protect your personal details against unlawful use. We do this on the basis of physical, administrative and technological measures.

For example: only authorised persons get access to our offices and our systems, and access is limited to the systems they require for professional purposes. These people must know our internal policy on privacy and data protection and be able to apply it correctly. If and insofar as data is provided to third parties, Rowlands agrees with these third parties that they will also optimally protect the personal details.

H. What are your rights?

Rowlands processes your personal details in accordance with the stipulations of this privacy statement. As an involved party you have a number of rights you can exert at any time.

You can exert the following rights:

- **Right of refusal or withdrawal of your consent**

We don't take references without your prior consent.

- **Right to object**

You can object to the processing of your personal details. You can only do this against processing based on the justified interests of Rowlands or of a third party (see higher in point C). In the exertion of this right you will have to submit the form indicating which processing you oppose and for which specific reasons. This is necessary in order to be able to make a correct balance of interest.

- **Right of access**

You can formally ask which personal details are processed about you. When providing this information we must always take account of the rights and freedoms of others.

- **Right to rectification (improvement and addition)**

You can request the rectification of all incorrect or incomplete objective (personal) details (wrong address, incorrect spelling of your name,...) you have provided by asking it personally at your contact.

If your request relates to other personal details, you have to use the form and indicate which data you want to rectify or complete. Subjective personal details you believe are incorrect (e.g. negative evaluation, unfavourable test results, etc.) are only adapted if we agree with you. If not, then we will not adapt these personal details, but will note your possible additional statements about this.

- **Right to data portability**

You have the right to transfer the personal details you have submitted to Rowlands yourself in electronic form to yourself (via the e-mail address you give on your application form) or to a person with processing responsibility you indicated (via his e-mail address you give on your application form).

- **Right to erasure (right to be forgotten)**

In the situations provided by the GDPR, you have the right to demand the erasure of your data. We will then remove your file concerning your job search.

- **Right to restriction of processing**

You have the right to obtain restriction of processing of your personal details if:

- You contest the correctness of your personal details (for the duration of the checking by Rowlands).
- The processing of your personal details by Rowlands would be unlawful, but you don't want to invoke your right to erase data.
- We no longer need your personal details for the purposes included in this privacy statement (point C), but you do need them for instituting, executing or substantiating a legal procedure.
- You made an objection against the processing of some of your personal details (for the duration of the balance of interest).

You can in principle exert your rights free of charge. You can do this by making use of the form we make available for this in your online profile on my Rowlands. If you don't have an online profile, you should use the form that can be found on our website www.rowlandsonline.com

You can download this form yourself or ask your consultant at a Rowlands office.

On the form you can find further instructions for filling in and sending your request.

If you submit your form via your online profile on my Rowlands, we in principle have enough information to be able to properly identify you and we don't require further proof of identity. This is why you should always make sure that you never pass on your login data and password of the online profile my Rowlands to others.

If you submit your request in another way, you must always send along a copy of your identity card so we can be certain of the applicant's identity. Without this copy your request will not be treated.

We will inform you in writing about what we are doing with your request a month after receipt of your completely filled in and properly sent form at the latest.

Depending on how difficult your request is or the number of requests we get from other people, this period may be extended by two months. In this case we will inform you about this extension within a month after receipt of your form.

In some cases (e.g. legal obligations, rights of others, periods of limitation, etc.) you will not be able to or be able to fully exert your rights. You will then get a message about this with the reason why we cannot or can't fully meet your request.

I. Cookies

On our domain Rowlands.lu we use cookies and web statistics. We do this to view how visitors use our website. This information helps us improve the site. A cookie is a file stored on your computer. These cookies can be recognised during a future visit to our website. You can read more about this in our Cookie Policy on our website.

J. Questions, remarks, complaints and data leaks

If you have any questions, remarks or complaints about the protection of your personal details by Rowlands or about this privacy statement, contact the Rowlands Data Protection Officer via gdpr@randstad.lu

You also have the right to file a complaint with the Data Protection Authority (DPA) at the following address: 1, Avenue du Rock'n'Roll 4361 Esch-sur-Alzette Luxembourg

If you know about a data leak, or you assume a data leak, please immediately pass this on to us via it-support@randstad.lu

K. Changes

Rowlands can for various reasons make improvements, additions or changes to this privacy statement.

The most up-to-date version can always be viewed on the Rowlands website.
This version was drawn up in July 2018.

