

# privacy statement for business relations

## (customer, prospect, supplier, consultant, influential, etc.)

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 Luxemburg<sup>1</sup>.

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 are:

- a contact at one of our (potential) customers of one or more services of Rowlands;
- a contact at one of our (potential) suppliers;
- an external consultant or a contact of one of our external audit or consultancy companies;
- a contact who was given as a reference by applicants as part of their registration at Rowlands, candidacy for a vacancy via Rowlands ;
- a contact of any authority (company, government, professional organisation of employers or employees, school, university, partner, etc.) with whom we (wish to) enter into a form of contact or collaboration and whose personal details we compile.

If you choose to provide us with information voluntarily, we will use this information in accordance with this privacy statement.

### A. Who we are

Rowlands, division of Randstad HR Services sa, 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)

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<sup>1</sup> 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).

## **B. When do we compile your personal details?**

We compile your data as soon as you have sent us this. This can be done by e-mail, text message, verbally (by phone, in the Rowlands office, during a visit to your company, at an event, training course, etc.), through giving us your business card or in any other possible way. This also happens when you are registered as a contact for our services by your company or organisation or if you are registered as a private individual customer.

We can also compile your data if it has been made publically accessible, or if you did this yourself on public/social media (e.g. LinkedIn) and this indicates that you are the right contact for us to interview as part of our service.

## **C. Why do we need your personal details?**

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 as part of the instruction and realisation of our HR services for you or for your company or organisation, for the introduction and realisation of our service voucher activities, for the introduction and realisation of joint projects or partnerships, for the advocacy of Rowlands's interests, or as part of your service as a supplier or consultant.

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

1. be able to provide you with information about the services and other activities of Rowlands and to be able to align these better to your needs and wishes or those of your company or organisation;
2. enter into a professional relationship with your company or organisation, to enter into and maintain a service agreement and to enable its realisation;
3. proactively be able to propose CVs and profile descriptions to you of suitable candidates and to be able to organise possible resulting job interviews;
4. exchange information with you for the invoicing and accounting of our services;
5. approach you for commercial offers, newsletters, events, workshops and other Rowlands informative messages that may be of interest to you as part of our (future) business relation;
6. contact you for taking references and assessing the profile and the suitability of a candidate who has given us permission to approach you for this;
7. contact you in your position at a public institution (government, university, professional federation, etc.) to look after the interests of Rowlands;

8. 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 may use the obtained information and process it to improve the quality of our services.
9. guarantee company safety. To this end we may, for instance, check your identity when accessing one of our offices. In case you use 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.
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. allow you to exert your rights (also see point H) and to indicate later on that we acted upon these rights.

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

1. **our (pre)contractual relationship and all related statutory obligations of Rowlands:** if we negotiate or enter into an agreement with you or your company or organisation, we need certain information from you or from a person involved in your company or organisation to be able to submit and discuss a suitable offer and to be able to prepare this agreement, draw it up and then carry it out correctly. If you do not want your personal details to be processed as part of this, we cannot enter into service with you.  
In the realisation of an agreement for recruitment & selection, we communicate our contact details or those of specific people of your company or organisation to our candidates so they know who to contact when they introduce themselves.
2. **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 be done, for instance, to offer and promote all services, and/or provide you with informative messages (newsletters, events,...) that are in line with what you can reasonably expect to receive from us in the context of our existing or possible (future) relationship. This can also 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.

#### D. Which of your personal details do we process?

We first and foremost process your personal details that are necessary for enabling the correct realisation of our services: your name and surname, your professional address and your professional contact details (telephone or mobile phone number and e-mail address).

Additional data (e.g. preferred language, competence, etc.) is not always necessary but may be useful as part of further developing our business relations or to better align our services and commercial actions to your interests, wishes and needs.

Other data is fully optional and only focuses on maintaining a good personal relationship with you (e.g. your birthday, your hobbies, etc.). If you choose to share these personal details with us then we can process this in our database.

We advise you to pass on any changes in your personal details as soon as possible.

#### **E. Who do we share your personal details with?**

Only if necessary for the realisation of objectives mentioned under point C, for the execution of the existing agreement, 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
  - the realisation of the objectives of our professional relationship;
  - internal services (administrative task such invoicing, customer and supplier accounting, credit control,, etc.);
  - inspection and complaints management (legal support)
2. to the holding company of Randstad (of wich Rowlands is part), or other partnerships in the Randstad group for among others
  - management information;
  - internal audits;
  - internal services
3. to applicants, candidates, temporary workers or domestic helps, for among other reasons:
  - job interview appointments;
4. to subcontractors or 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, 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 FR2S (Federation for Recruitment Search & Selection) for among others:
- scientific research;
  - satisfaction surveys;
  - statistical purposes;
7. to various public bodies, in the context of inspections and investigations, such as, among others:
- national inspection services and accreditation bodies;
  - social security departments;
  - tax authorities;
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 may sell or buy activities or assets. In case of a sale, merger, reorganization, dissolution or similar event, your personal data 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 Luxembourg 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?**

Your personal details are kept for the time required for the execution of our services and the objectives described under point C..

#### **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 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 (personal) details by personally addressing your contact person.

- **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 cases provided in the GDPR, we will remove your personal details at your request.

- **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 that can be found on our website [www.rowlandsonline.com](http://www.rowlandsonline.com).

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

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 <http://rowlandsonline.com> 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](mailto:gdpr@randstad.lu)

You also have the right to file a complaint with the Data Protection Authority (DPA) at the following address: Commission Nationale pour la Protection des Données 1, avenue du Rock'n Roll L-4361 Esch-sur-Alzette

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](mailto: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.



