

## Privacy information

**for all employees, self-employed representatives, contractors and freelancers within the Van de Velde group**

Van de Velde NV and its subsidiaries (hereinafter “**Van de Velde**”) collect and process personal data of current and former employees, self-employed representatives, contractors and freelancers.

Van de Velde is responsible for the processing of personal data as described in this document (hereinafter “**Information**”). Van de Velde consequently acts as controller, alone or together with your local Van de Velde entity, which is your direct employer or principal.

**Van de Velde respects your privacy.** Through this Information, Van de Velde wishes to inform you about the data processing taking place. This Information may be amended from time to time and is always available on [Conversation Room – Files – All – Privacy documents](#).

### Article 1 – Which categories of personal data does Van de Velde process?

Van de Velde can process certain categories of personal data (hereinafter “**Personal data**”) as described below. Van de Velde may have received certain of your personal data from other sources than you directly, such as recruitment agencies or head-hunters.

#### Current or previous employees of Van de Velde

<b>Personal identifying data</b>	First name, last name, home address, identification data given by the company (work number), private email address, private phone number and contact person and phone number in the case of emergencies.
<b>General identifying data</b>	Licence plate, driving licence number, driving licence type, driving licence date of issue, national register number and ID card number.
<b>Identifying data issued by the authorities</b>	Social security number, Dimona employment number.
<b>Financial identifying data</b>	Bank account number, account holder.
<b>Personal characteristics</b>	Gender, date of birth, place of birth, nationality, language, civil status.
<b>Household composition</b>	Legal status, date of marriage/cohabitation, first name, last name, gender, date of birth, place of birth, occupation, disability, hospitalisation of a partner and/or children, right to child benefit, whether the partner/child is a dependent for tax purposes.
<b>Training and education</b>	Academic curriculum, being information about the schools, institutions and universities attended, nature of the course followed and diplomas earned.
<b>Current employment</b>	Employer, job title and description, length of employment contract, occupational category, joint industrial committee, service grade, date of hire and first date of employment, length of probationary period, place of work, employment arrangements and conditions, the number of hours worked per month, manager, place of work, distance between home and place of work, usually type of transport used to get to and from work, average number of days on the road per month, relationship with the employer, last date of employment, notice period.

<b>Previous employment</b>	Information about previous employment, being employer, period and job title and description.
<b>Remuneration</b>	Salary, bonus, benefits, (fixed) expense allowance, company car, supplements, end-of-year bonus, payment method
<b>Data on mobile phone use</b>	Current operator and registration type, portable mobile phone number, SIM card number.
<b>Data relating to physical health</b>	Medical certificate.

### Self-employed representatives of Van de Velde

<b>Personal identifying data</b>	First name, last name, address, email address, phone number.
<b>Identifying data issued by the authorities</b>	Identifying number of the commercial register.
<b>Financial identifying data</b>	Bank account number, account holder.
<b>Remuneration</b>	Commission amounts.
<b>Current employment</b>	title and description of the representation assignment, length, start and end date of the representation, termination options, notice period.

### Contractor or freelancer active with Van de Velde

<b>Personal identifying data</b>	First name and last name of the service provider.
<b>Remuneration</b>	Rate for services provided, rate for travel costs.
<b>Current employment</b>	Commissioning party, job title and description, length of the working relationship, start and end date of the assignment, number of hours worked per month, termination options, notice period.

## Article 2 – What if you refuse to share Personal data with Van de Velde?

Your refusal to share any of the aforementioned personal data with Van de Velde may:

- render difficult the performance of the contract of employment (employees) or the working relationship;
- render impossible the performance of the contract of employment (employees) or working relationship, concerning certain personal data such as name, address and date of birth.

## Article 3 – For what purposes does Van de Velde process your Personal data?

Van de Velde processes personal data of current and former employees, self-employed representatives, contractors and freelancers (hereinafter “**Employees**”) for various purposes.

Each purpose needs to have at least one legal basis, such as:

- Necessary for the performance of a contract [CONTRACT];
- Necessary to comply with a legal obligation [LEGAL OBLIGATION];
- Justified interest of Van de Velde [JUSTIFIED INTEREST];
  - o Conducting regular business activities, such as assessing and improving the performance of (people who work for) Van de Velde;
  - o Protecting company property and interests against any type of damage.

The purposes can be categorized as follows:

Purpose	Legal basis
Management and administration of Employees. This makes possible: <ul style="list-style-type: none"> <li>▪ performance assessment and monitoring</li> <li>▪ training and career planning</li> </ul>	<ul style="list-style-type: none"> <li>• CONTRACT</li> <li>• LEGAL OBLIGATION</li> </ul>
Payroll services (administering salaries, remuneration, commissions and wages) and management of other employee benefits.  This also includes the application of the social security laws and related social security contributions.	<ul style="list-style-type: none"> <li>• CONTRACT</li> <li>• LEGAL OBLIGATION</li> </ul>
Planning, organising, sharing and monitoring tasks and positions. This makes it possible to plan and monitor the workload and the performance of the Employees.	<ul style="list-style-type: none"> <li>• CONTRACT</li> <li>• JUSTIFIED INTEREST</li> </ul>
Checking the work-related activity at the workplace by camera, clocking-in system or other computer system.	<ul style="list-style-type: none"> <li>• CONTRACT</li> <li>• JUSTIFIED INTEREST</li> </ul>
Safety of operations (= safeguarding persons and/or goods)	<ul style="list-style-type: none"> <li>• LEGAL OBLIGATION</li> <li>• JUSTIFIED INTEREST</li> </ul>
Preventive periodic medical exam of workers	<ul style="list-style-type: none"> <li>• CONTRACT</li> <li>• LEGAL OBLIGATION</li> </ul>
Communication with Employees	JUSTIFIED INTERESTS
Implementing or applying laws and regulations	LEGAL OBLIGATION
Insurance: <ul style="list-style-type: none"> <li>▪ Accident at work insurance</li> <li>▪ Hospitalisation insurance</li> <li>▪ Pension savings group insurance</li> <li>▪ Long-term incapacity for work group insurance</li> </ul>	<ul style="list-style-type: none"> <li>• CONTRACT</li> <li>• LEGAL OBLIGATION</li> </ul>
Resumption of work after long period of incapacity for work	<ul style="list-style-type: none"> <li>• CONTRACT</li> <li>• LEGAL OBLIGATION</li> </ul>
Outplacement	LEGAL OBLIGATION
Application for thematic leave and time credit	LEGAL OBLIGATION
Financial and management reporting	<ul style="list-style-type: none"> <li>• LEGAL OBLIGATION</li> <li>• JUSTIFIED INTEREST</li> </ul>
Registration as director of a subsidiary of Van de Velde in a (foreign) commercial register	<ul style="list-style-type: none"> <li>• CONTRACT</li> <li>• JUSTIFIED INTEREST</li> </ul>
Sharing of personal data with bank for direct debit from Van de Velde's bank account	

The processing of personal data is based on one of the purposes stated above (depending on the specific personal data category and specific purpose of the processing). **Not all legal bases apply at the same time.**

## Artikel 4 – Who is permitted to receive Personal data?

Van de Velde works with trusted partners for the processing of Personal data. The table below shows the types of partners with which Van de Velde works:

Type of third party
Payroll services provider
Providers of other employee benefits (car leasing company, car insurer, fuel card supplier, meal voucher supplier, public transport, telecommunication services)
Insurance companies
Provider of HR tools (e-learning platform, keeping absence and leave figures up to date, uploading expense receipts, electronic payslips)
Social Inspectorate and National Employment Office
Occupational physician
Provider of career and outplacement guidance
Credit card company
Commercial register
Bank

## Artikel 5 – Are Personal data transferred outside of Europe?

Van de Velde transfers Personal data outside the European Economic Area ("EEA"). In these cases, Van de Velde has taken the required steps to ensure that the Personal data are protected in accordance with applicable privacy laws.

Currently, Personal data may be transferred to the following countries outside the European Economic Area:

Country outside the EEA	Legal basis for the transfer
United States	Standard data protection stipulations laid down by the European Commission.

Except in the case of an adequacy decision by the European Commission, you may ask Van de Velde to receive information on the legal basis for the transfer by email to [privacy@vandevelde.eu](mailto:privacy@vandevelde.eu).

## Artikel 6 – How long are Personal data kept?

Personal data will be kept for as long as this is necessary for the purpose for which they are collected.

Van de Velde applies the following retention periods. **Please be aware that you will only be able to request Van de Velde for certain documents for a limited time after the end of your employment contract (such as payslips).**

Type of document <sup>12</sup>	Term	Term starts
<b>1. Social documents</b>		
General employee register	5 years	From the end of employment of the last employee listed in the register
Special employee register	5 years	From the end of employment of the last employee listed in the register
Individual account	5 years	From the end of the year to which the individual account applies
<b>2. Contracts of employment</b>		
Student work, work at home, traineeship contract, other contracts of employment	5 years	From the day following the end of the contract
Related documents (letter of resignation/notice, settlement etc.)	5 years	From the day following the end of the contract
<b>3. Part-time work</b>		
Copy of the contract of employment	5 years	From the day following the end of the contract
Posted daily message with applicable variable work schedule per employee	1 year	From the day following the day on which the work schedule no longer applies
Register of departures from the regular part-time work schedules	5 years	From the day following the end of the month following the quarter in which the most recent departure is registered
<b>4. Payroll-related documents (including salary data)</b>		
Payslips + other	5 years	From the day following the end of the contract
<b>5. Working hours</b>		
Overview of worked hours (in case of overtime/minor flexibility)	5 years	From the day following the end of the contract
<b>6. Accidents at work/Wellbeing/Medical documents</b>		
Accidents at work index card and all copies and/or prints of the forms used to record accidents at work (as well as reports)	10 years	From creation
Medical file (by department responsible for	15 years	After end of employment

<sup>1</sup> German employees:

**Payroll-related documents:** 10 years, unless an income tax check is conducted within 6 years.

**Employee files (including contracts of employment):** 6 years, unless an income tax check is conducted within 3 years.

**Pension insurance:** 6 years, unless an income tax check is conducted within 3 years or as long as the employee receives payments from the insurance.

**Travel costs:** 10 years, unless an income tax check is conducted within 6 years.

<sup>2</sup> Danish employees:

**Wellbeing/medical documents and sick notes not related to accidents at work:** as long as necessary and no longer than 5 years from the day following the end of the contract. If there is a legitimate reason for keeping the data longer, VdV will do so based on a case by case approach.

**Accidents at work/wellbeing/medical documents and sick notes related to accidents at work:** as long as necessary and no longer than 3 years following the end of the case. If there is a legitimate reason for keeping the data longer, VdV will do so based on a case by case approach. This includes data provided to the Danish Labour Market Insurance.

**Accounting documents that do not serve as proof for third parties:** 5 years from the year following the closing.

**Pension schemes + amendments:** 5 years from the day following the end of the contract.

medical supervision)		
Individual file as part of an intervention request with regard to psychosocial risks (by the prevention advisor psychosocial aspects)	20 years	From the date on which the request is submitted
Statements in the register of actions by third parties	5 years	From the day on which the employee has had these statements registered
Lists of safety positions, positions requiring increased vigilance and activities with specific risk and list of names of employees that are subject to health supervision	5 years	From the date on which these lists are drawn up
<b>7. HR-related documents (employee file)</b>		
Notifications, assessment reports, performance interviews, job descriptions, sick notes, documents relating to educational and trade union leave	5 years	From the day following the end of the contract
<b>8. Social security documents</b>		
DMFA	5 years	From the end of the period to which the DMFA relates
DIMONA: certificate confirming the receipt of the declaration	6 months	From the receipt of the certificate
<b>9. Accounting documents</b>		
Documents that serve as proof for third parties (account books and support documents)	7 years	From the year following the closing
All documents that do not serve as proof for third parties	3 years	From the year following the closing
<b>10. Tax documents</b>		
Documents necessary to determine the taxable income	7 years	From the end of the year to which they apply
<b>11. Pension-related documents</b>		
Pension schemes (+ amendments)	10 years	From the day on which the last benefit is due based on the scheme
Individual pension slips	5 years	From the day on which the payment was made to the person in question
<b>12. Register of promotional gifts</b>		
Register of promotional gifts	5 years	A register must be kept covering the last five years

## Article 7 – Which rights do you have regarding your Personal data?

### 7.1 General

You can exercise your rights by emailing the Group Privacy Officer at [privacy@vandevelde.eu](mailto:privacy@vandevelde.eu).

- You have the right to ask Van de Velde for access to certain Personal data.
- In certain cases, you also have the right to have your Personal data corrected or erased, its processing limited (for instance, if processing is no longer necessary for the purposes for which Van de Velde has received them) and object to their processing.
- If processing requires your consent, you have the right to withdraw this consent at any time.

- Furthermore, in certain cases you have the right to data transfer.

If you feel that Van de Velde has failed to handle your request properly, you can make a complaint to the regulatory authority. For Van de Velde NV this is the Gegevensbeschermingsautoriteit (Belgium).

## 7.2 Direct Marketing

Specifically with regard to direct marketing that Van de Velde may send to its employees, contractors and freelancers, you have the right to object to this processing free of charge at any time.

You can exercise this right by emailing the Group Privacy Officer at [privacy@vandevelde.eu](mailto:privacy@vandevelde.eu).

## Article 8 – Contact information

If you have any questions or wish to make a complaint relating to the processing of your Personal data by Van de Velde, please email the Group Privacy Officer at [privacy@vandevelde.eu](mailto:privacy@vandevelde.eu).



If you believe or suspect that **an inconsistency with this Information** has occurred or may occur in the future, we ask you to report this concern as soon as possible using the procedure outlined in the diagram “Internal reporting” in Van de Velde’s Whistleblowing policy. Under our Whistleblowing Policy, the report is treated confidentially and the reporting person is protected against possible retaliation. Moreover, the report can be made anonymously. The Whistleblowing policy can be consulted via [this link](#). For questions, please contact [whistleblowing@vandevelde.eu](mailto:whistleblowing@vandevelde.eu).