



Privacypolicy for own workforce

This policy was approved by the Board of Directors of Van de Velde NV on 27 August 2024.

To our own workforce

Van de Velde respects your privacy and wants to tell you about how your data is processed.



In this policy (hereinafter referred to as the **"Policy"**), **"we"**, **"our"** and **"Van de Velde"** means Van de Velde NV with address Lageweg 4, 9260 Schellebelle, Belgium and all direct and indirect subsidiaries **in the European Union**.

Van de Velde collects and processes personal data of current and former employees, self-employed representatives, contractors and consultants.

Van de Velde is responsible for processing personal data as set out in the Policy. Van de Velde NV acts as controller, alone or together with a local Van de Velde entity that is your direct employer or principal.

The Management Team is responsible for applying the Policy. The Policy is discussed and assessed by the Management Team on an annual basis. Adaptations and improvements are made where necessary, after approval by the Board of Directors.

Contact privacy@vandevelde.eu if you have any queries or concerns.

We wish you all the best,

Karel Verlinde, CEO, and Herman Van de Velde, Chairman of the Board of Directors



What personal data do we process?

Van de Velde may process various categories of personal data. We may receive this personal data directly from recruitment and executive search agencies.



The personal data below is referred to hereinafter as “**Personal Data**”. Your refusal to share Personal Data with Van de Velde can render the performance of the contract of employment (in the case of employees) or the working relationship difficult or impossible.

Current or former employees	
Personal identifying data	First name, last name, private address, identifying data assigned by Van de Velde (work number), private email address, private phone number, and contact person name and phone number for emergencies.
General identifying data	Vehicle number plate, driving licence number, driving licence type, driving licence issue date, national registration number, ID card number.
Identifying data issued by authorities	Social security identification number, Dimona employment number.
Financial identifying data	Bank account number, beneficiary of the account.
Personal characteristics	Sex/gender, date of birth, place of birth, nationality, language, civil status.
Household composition	Legal status, date of marriage/cohabitation registration, first name, last name, sex/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 dependant for tax purposes.
Training and education	Academic CV, that is: information about the schools, institutions and universities attended, nature of the courses followed and diplomas earned.
Current employment	Employer, job title and description, length of contract of employment, occupational category, joint industrial committee, job grade, date of hire and first date of employment, length of probationary period, place of work, terms and practical details of employment, the number of hours worked per month, manager, place of work, distance between home and place of work, usual type of transport used to get to work, average number of days on the move per month, relationship with the employer, last date of employment, term of notice.
Previous employment	Information about previous employment, that is: employer, period and job title and description.
Remuneration	Salary, bonus, benefits, (flat-rate) expense allowance, company car, supplements, end-of-year bonus, payment method.
Mobile phone use data	Current operator and registration type, portable mobile phone number, SIM card number.
Physical health data	Medical certificate.

Self-employed representatives	
Personal identifying data	First name, last name, address, email address, phone number.
Identifying data issued by authorities	Identifying number of the commercial register.
Financial identifying data	Bank account number, beneficiary of the account.
Remuneration	Commission amounts.
Current employment	Title and description of the representation contract, length, start and end date of the representation, termination possibilities, term of notice.

Contractors or consultants	
Personal identifying data	First name, last name.
Remuneration	Rate for services provided, rate for travel costs.
Current employment	Contracting party, job title and description, length of the working relationship, start and end date of the contract, number of hours worked per month, termination possibilities, term of notice.

Why do we process Personal Data?

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



Each purpose must 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];
- Legitimate interest of Van de Velde [LEGITIMATE INTEREST];
 - o Regular business activities, such as collecting information about, assessing and improving the performance of (people who work for) Van de Velde;
 - o Protecting the property and interests of Van de Velde against damage.

The purposes can be classified as follows:

Purpose	Legal basis
Management and administration of Employees. This makes the following possible: <ul style="list-style-type: none"> ▪ assessment and monitoring of performance ▪ training and career planning 	CONTRACT LEGAL OBLIGATION
Payroll services (administration of salaries, remuneration, commissions and wages) and management of other employee benefits. The application of the social security laws and the payment of the related social security contributions are also in scope here.	CONTRACT LEGAL OBLIGATION
Planning, organising, allocating and monitoring tasks and positions. This makes it possible to plan and monitor the workload and the performance of the Employees.	LEGITIMATE INTEREST CONTRACT
Checking the work-related activity at the workplace by means of camera, clocking-in system or other computer system.	LEGITIMATE INTEREST CONTRACT
Operational safety (safety of persons and/or goods)	LEGITIMATE INTEREST LEGAL OBLIGATION
Preventive periodic medical examination of blue-collar workers	CONTRACT LEGAL OBLIGATION
Communication with Employees	LEGITIMATE INTEREST
Implementation or application of laws and bylaws	LEGAL OBLIGATION
Insurance: <ul style="list-style-type: none"> ▪ Accident at work insurance ▪ Hospitalisation insurance 	LEGAL OBLIGATION CONTRACT

<ul style="list-style-type: none"> ▪ Pension savings group insurance ▪ Long-term incapacity for work group insurance 	
Resumption of work after long-term incapacity for work	LEGAL OBLIGATION CONTRACT
Outplacement	LEGAL OBLIGATION
Application for thematic leave and time credit	LEGAL OBLIGATION
Financial and management reporting	LEGITIMATE INTEREST LEGAL OBLIGATION
Registration as director of a subsidiary of Van de Velde in a (foreign) commercial register Sharing of personal data with a bank for direct debits from Van de Velde's bank account.	LEGITIMATE INTEREST CONTRACT

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

Do we share Personal Data?

Van de Velde works with trusted partners to process Personal Data.



The categories of third parties with which Van de Velde works are stated in the table below:

Categories of third parties
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 social security services
Occupational physician
Provider of career and outplacement guidance
Credit card company
Commercial register
Bank

Van de Velde may transfer Personal Data to countries **outside the European Economic Area ("EEA")**. In these cases Van de Velde has taken the steps necessary to ensure the Personal Data is protected in accordance with applicable privacy laws.

Personal Data may currently 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 established by the European Commission.

You may ask Van de Velde to tell you the legal basis for the transfer by emailing privacy@vandevelde.eu, except when the European Commission adopts a decision on adequacy.

How long do we retain Personal Data?

Personal Data is retained for as long as necessary for the purpose it is collected for.

Van de Velde applies the following retention periods. **Note that you can request certain documents (such as payslips) from Van de Velde only for a limited time after the end of your contract of employment.**

Document type ¹²	Retention term	Retention term starts
1. Social documents		
General employee register	5 years	From the end of employment of the last employee in the register
Special employee register	5 years	From the end of employment of the last employee in the register
Individual account	5 years	From the end of the year the individual account applies to
2. Contracts of employment		
Student work, BIS traineeship contract, other contracts of employment	5 years	From the day after the end of the contract
Related documents (letter of resignation/notice, settlement etc.)	5 years	From the day after the end of the contract
3. Part-time work		
Copy of the contract of employment	5 years	From the day after the end of the contract
Posted daily notice of variable work schedule per employee	1 year	From the day after the first day the work schedule no longer applies
Register of departures from the regular part-time work schedules	5 years	From the day after the end of the first month following the three-month

¹ German employees:

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

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

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

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

² Danish employees:

Wellbeing/medical documents and fit notes not related to accidents at work: for as long as necessary and no longer than 5 years from the first day after the end of the contract. If there is a legitimate reason for retaining the data for a longer term, Van de Velde will do so based on an assessment of the specific case.

Accidents at work/wellbeing/medical documents and fit notes related to accidents at work: for as long as necessary and no longer than 3 years after the file is closed. If there is a legitimate reason for retaining the data for a longer term, Van de Velde will do so based on an assessment of the specific case. This includes data provided to the Danish occupational accidents insurer.

Accounting documents that are not valid as proof against third parties: 5 years from the year after closing.

Pension schemes (including amendments): 5 years from the day after the end of the contract.

		period during which the most recent departure is registered
4. Payroll-related documents (including salary data)		
Payslips + other	5 years	From the day after the end of the contract
5. Working hours		
Summary of worked hours (in case of overtime/low flexibility)	5 years	From the day after the end of the contract
6. Accidents at work/wellbeing/medical documents		
Accidents at work file card and all copies and/or prints of the forms used to record accidents at work (including reports)	10 years	From creation
Medical file (by department responsible for medical supervision)	15 years	After end of employment
Individual file as part of a psychosocial risk intervention request (by the prevention advisor psychosocial aspects)	20 years	From the date the request is submitted
Statements in the register of third-party actions	5 years	From the day the employee has these statements entered
Lists of safety positions, positions requiring increased vigilance, activities with specific risks, and lists of names of employees subject to health supervision	5 years	From the date these lists are drawn up
7. HR-related documents (employee file)		
Notifications, appraisal reports, performance interviews, job descriptions, fit notes, documents relating to educational and trade union leave	5 years	From the day after the end of the contract
8. Social security documents		
DMFA	5 years	From the end of the period to which the DMFA relates
DIMONA: certificate confirming the receipt of the notification	6 months	From the receipt of the certificate
9. Accounting documents		
Documents that serve as proof against third parties (trading books and support documents)	7 years	From the first year after the closing
All documents that are not valid as proof against third parties	3 years	From the first year after the closing
10. Tax documents		
Documents required to determine the taxable income	7 years	From the end of the year they apply to
11. Pension-related documents		
Pension schemes (+ amendments)	10 years	From the day the last scheme related benefit is due
Individual pension slips	5 years	From the day the payment is made to the person in question
12. Register of promotional gifts		
Register of promotional gifts	5 years	A register covering the last five years must be kept
13. Personal Data of providers (self-employed representatives, consultants, contractors)		
All documents except accounting documents	5 years	From payment of the most recent invoice

Exercising privacy rights

You can exercise your rights and ask questions by email to the Compliance Officer at privacy@vandevelde.eu.



1. Your privacy rights

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, have its processing limited (for instance, if processing is no longer necessary for the purposes for which Van de Velde has received it) and object to its processing.

If processing is consent-based you have the right to withdraw this consent at any time. You have the right to object, free of charge at any time, to direct marketing that Van de Velde may send to its employees, self-employed representatives, contractors and freelancers.

In certain cases, you also have the right to data portability.

2. Filing complaints

You can file a complaint to the regulatory body if you feel Van de Velde has failed to handle your request properly.

For Van de Velde NV this is the Data Protection Authority (Belgium).

Report a suspicious situation

Report concerns about any breaches or suspected breaches of the Policy as soon as possible.



3. Report to the Compliance Officer

Report breaches and suspected breaches of the Policy to the Compliance Officer (head of the Legal Department). Reports can be filed by calling +32 9 365 25 10 or emailing privacy@vandevelde.eu.

4. Questions?

If you have a question or wish to file a complaint about the processing of your Personal Data by Van de Velde, contact the Compliance Officer (head of the Legal Department) by calling +32 9 365 25 10 or emailing privacy@vandevelde.eu.

5. File a report via the Whistleblowing channel



You can also file a report using the procedure set out in the “Internal report” chart in the Van de Velde **Whistleblowing Policy** if you believe or suspect the Policy has been breached or could be breached in the future.

The report will be handled in confidence and the reporter will be protected from any reprisals in accordance with the Van de Velde Whistleblowing Policy. Reports can also be filed anonymously. Any questions can be emailed to whistleblowing@vandevelde.eu.

The [Whistleblowing Policy](#) can be accessed through People, in Conversation Room (Files – All – Legal Policies) and at www.vandevelde.eu (Van de Velde – Whistleblowing).

Protection from reprisals

Van de Velde wants to encourage openness and will support anyone who reports an issue in good faith, even if this ultimately proves to be unfounded.



Persons who are pressurised by others to breach the Policy or who report an issue or abuse by others may be concerned about possible negative consequences for themselves. These could take the form of dismissal, disciplinary measures, threats or detrimental treatment.

Van de Velde imposes a total **ban on reprisals** under the Policy.

Van de Velde does its utmost to ensure that you need not fear negative consequences if you:

- Refuse to take part in breaches of the Policy;
- File a report in good faith that you suspect a breach has occurred or could occur in the future.

You can also file a report using the procedure set out in the “Internal report” chart in the Van de Velde **Whistleblowing Policy** if you believe or suspect the Policy has been breached or could be breached in the future. In doing so, you can rely on the protective measures set out in the Whistleblowing Policy.