

## PRIVACY POLICY HR

Coöperatie Koninklijke Cosun U.A co-operating with its group companies (“COSUN”) considers the protection of your personal data important. By use of this Privacy Policy, we want to ensure that it is clear to you which personal data COSUN processes in the course of recruitment activities, and what occurs with this personal data.

FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

### 1. For recruitment purposes

(a) What does this purpose entail?

If you contact one of our recruiters, apply for a vacancy or register at the COSUN recruitment website, we include the personal data you provide to us in our recruitment database. Also, we will process your personal data in accordance with the addressing of your application with the relevant group company of COSUN, to manage our recruitment database and to communicate with you. For example, we may inform you about new vacancies or invite you for recruitment activities.

(b) On what legal basis do we process personal data for this purpose?

The legal basis for processing your personal data for this purpose is your consent and necessary for the legitimate interests pursued by COSUN.

Consent: By providing your data to COSUN and by confirming the explicit option that you agree with the processing of you personal data, you explicitly consent to the processing of your personal data for the purpose as described in article 1 (a). You have the right to withdraw your consent at any time. If you withdraw your consent this does not affect the lawfulness of processing based on consent before withdrawal.

Legitimate interest: COSUN aims to work with the best people within the right place of its organisation. COSUN takes an active effort to get in touch with suitable candidates who like to strengthen its team. It may be that COSUN advertises with a specific job opening, but it also welcomes open job applications. COSUN has a legitimate interest to process personal data of candidates who have indicated their interest in a job position at COSUN. For instance, it could be that the relevant job opening has already been provided for, but that in future other interesting positions will become available. COSUN would in future like to bring such interesting job openings to your attention, and therefore also for that reason, your personal data will be retained for a limited period of time.

COSUN processes your personal data mainly for the purpose of its usual course of business. COSUN may also use your personal data to inform you and for ongoing relationship purposes. Your personal data may also be required for our own internal administration, for HR purposes and in order to comply with our own statutory legal obligations. Your personal data will only be used for the purposes specified above, or for purposes which are compatible with such purpose.

(c) Which personal data do we process for this purpose?

For this purpose, we process your contact details, photographs, recruitment information (such as your resume, employment history, education history etc.) and correspondence with COSUN with regard to job applications (including references).

(d) How long do we retain your personal data for this purpose?

For this purpose, your personal data will be retained as long as necessary to complete the recruitment process. In case we reasonably expect to have alternative job openings that may be interesting for you in the near future, we may retain your personal data for such purposes, but in any event no longer than 1 year]. We will only retain your data if you have consented to this.

(c) Who has access to your personal data?

Your personal data will only be used insofar necessary in the course of recruitment purposes as mentioned in this paragraph and only by specific appointed employees or other personnel for or on behalf of COSUN. This also entails personnel of other business groups or external parties insofar these external parties process personal data on behalf of COSUN for explicit agreed purposes. COSUN requires these external parties to impose at least the same level of security as it has implemented itself in order to protect your personal data. COSUN will not share your personal data with any third party besides the parties mentioned in this paragraph, unless required in order to comply with statutory obligations.

## **2. To enter into an employment contract or contract for services with you**

(a) What does this purpose entail?

If we offer you a position at COSUN, we will process your personal data to prepare and process an employment agreement. We use your personal data for the conclusion, execution and termination of your employment agreement. We will then also store your personal data in our HR database.

If you are an independent contractor, we will process your personal data in the same way to enter into an agreement for services with you.

(b) On what legal basis do we process personal data for this purpose?

The personal data you have provided to COSUN are required for the performance by COSUN of your employment agreement and to enable it to comply with statutory legal obligations in connection with your employment contract, such as the processing and remittance of social contributions, retirements, etc.

(c) Which personal data do we process for this purpose?

For this purpose, we process your contact details, date of birth, gender, civil status, nationality, photographs, citizen service number, ID card or passport details, declaration of employment status, chamber of commerce and VAT details, recruitment information (such as employment history, education history details), job and position data (whether or not for your employee file), work permit details, availability, terms of employment, tax details, payment details, insurance details and location and organizations.

(d) How long do we retain your personal data for this purpose?

For this purpose, after the termination of your employment contract, your personal data will be retained (i) for as long as COSUN is obliged by applicable law to retain your personal data and/or (ii) if COSUN has a necessary legitimate interest to protect its legal interests. After this period, we will delete your personal data from our systems.

(e) Who has access to your personal data?

Your personal data will only be used insofar necessary in the course of recruitment purposes as mentioned in this paragraph and only by specific appointed employees or other personnel for or on behalf of COSUN. This also entails personnel of other business groups or external parties insofar these external parties process personal data on behalf of COSUN for explicit agreed purposes. COSUN requires these external parties to impose at least the same level of security as it has implemented itself in order to protect your personal data. COSUN will not share your personal data with any third party besides the parties mentioned in this paragraph, unless required in order to comply with statutory obligations.

#### HOW DO WE PROTECT YOUR PERSONAL DATA?

COSUN continuously takes technical and organisational measures in order to protect your personal data against unlawful access, loss, deletion, making available and unauthorised use, and to protect the accuracy and integrity of your personal data. These measures are evaluated and updated if necessary.

#### HOW DO YOU EXERCISE YOUR RIGHTS?

In case you have any questions in relation to the processing of your personal data by COSUN, or in case you wish to gain access to your personal data which COSUN processes, or if you wish to have such personal data deleted or amended, or in case you have objections against such processing and wish to – pending such complaints – wish to limit such processing, you can contact COSUN through the contact details listed below. COSUN will in principle respond to your query within one month as of the date of your request.

In case you have a complaint about the processing of personal data by or on behalf of COSUN, you have the possibility to file a complaint with the Dutch Data Protection Authority (“DPA”).

Contact: Coöperatie Koninklijke COSUN U.A. Postbus 3411, 4800 MG Breda, E-mail: [GDPR@COSUN.com](mailto:GDPR@COSUN.com)

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