



GENERAL PRIVACY POLICY FOR EMPLOYEES OF DÜMMEN ORANGE

1. INTRODUCTION

- 1.1 Within the framework of the employment relationship, Dümmen Orange Processes Personal Data and considers it important that this Personal Data is treated carefully and confidentially. In this General Privacy Policy Dümmen Orange lays down how it deals with privacy and the Processing of employees' Personal Data (the '**General Privacy Policy**').
- 1.2 This General Privacy Policy is applicable to all Processing of employees' Personal Data by, or on behalf of, Dümmen Orange.

2. DEFINITIONS

- 2.1 The words and expressions used in this General Privacy Policy have the following meanings:

Data Subject An employee of Dümmen Orange to whom Personal Data relates.

Third Party Any party, not being the Data Subject, the Controller, the Processor, or any other person, who is authorised to Process Personal Data under the direct authority of the Controller or the Processor.

Group The economic entity in which legal entities and companies are organisationally connected as referred to in Article 2:24b of the Dutch Civil Code.

Personal Data Any data relating to an identified or identifiable natural person.

Controller Dümmen Orange.

Processor *for you* The person who Processes Personal Data on behalf of

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the Controller.

Processing

Any action or any entirety of actions relating to Personal Data, including the collection, recording, organising, storing, changing, consulting, using, issuing and destruction.

3. PROCESSING PERSONAL DATA

3.1. Bases: Dümmen Orange Processes Personal Data within the framework of executing the employment contract. Dümmen Orange can also Process Personal Data based on one of the other legal bases, such as a statutory obligation, unequivocal permission from the Data Subject(s), or a legitimate interest.

3.2. Purposes: Dümmen Orange can Process Personal Data for, among others, the following purposes:

- Salary and financial administration;
- Updating the personnel file;
- Sickness absence register;
- Leave register;
- Staff assessments;
- Functional management: requesting and managing authorisations/access;
- IT management: security, hardware and software, the registration of login and logout moments in connection with system load and the registration of SIM card holders and SIM card usage;
- Registration of members of the Company Emergency Response Team and first aid training courses attended;
- The administrative processes in relation to the above-mentioned points, including reporting and accountability;
- The fulfilment of statutory obligations such as tax and social insurance legislation.

3.3 Personal Data is to be exclusively Processed in accordance with the purposes for which it was obtained. Dümmen Orange does not Process any more Personal Data than is strictly necessary.

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- 3.4 Access: Only employees within the group and parties authorised by Dümmen Orange have access to Personal Data insofar as this is necessary for the execution of their task. These employees/parties have a duty of confidentiality in relation to the Personal Data that comes to their attention.
- 3.5 Transfer: Dümmen Orange issues Personal Data to third parties such as the Tax and Customs Administration. Issuing to third parties only takes place if:
- it is necessary for the execution of an agreement with a Data Subject; or,
 - this results from a legal obligation; or,
 - a Data Subject has given explicit permission for the issuing.
- 3.6 Security: Dümmen Orange has taken suitable technical and organisational measures to protect the Personal Data against loss or impairment and against unauthorised perusal, change, or issuing.
- 3.7 Retention periods: The Personal Data will not be retained for longer than is necessary in order to achieve the purposes for which it is being Processed. For example, Personal Data will, in principle, be retained for no longer than 2 years after the end of the period of employment, with the exception of (i) legal obligations on the grounds of tax legislation, in which case a retention period will apply of 7 years and (ii) wage tax, in which case a retention period of 5 years will apply.
- 3.8 Complaints: If the Data Subject is of the opinion that the provisions of this General Privacy Policy are not being observed, the Data Subject can submit a complaint to Dümmen Orange via Privacy@DummenOrange.com. Dümmen Orange will process the complaint and respond in writing within 1 month.

4. DATA SUBJECT RIGHTS

- 4.1 General: The Personal Data of Data Subjects is stored and retained in personnel files which are managed by Dümmen Orange HR Nederland. Any requests relating to the execution of rights, as indicated below, must be submitted in writing to Dümmen Orange via Privacy@DummenOrange.com. Dümmen Orange will make an effort to deal with requests in writing within one month.
- 4.2 Perusal: A Data Subject is allowed to *for you* peruse his/her personnel file. A note must be made in the



personnel file that perusal has been granted.

- 4.3 Supplementation, rectification, deletion or protection of Personal Data: A Data Subject can ask Dümmen Orange to have information in his/her personnel file supplemented, improved, deleted or protected. Dümmen Orange will inform the Data Subject in writing as to whether, and to what extent, the request is to be granted. If the request is not, or partially, granted, this will be communicated to the Data Subject, along with the reasons.
- 4.4 Deletion: The right to delete Personal Data does not apply if it is plausible that the retention is substantially important for a party other than the Data Subject, or if deletion is prohibited on legal grounds.
- 4.5 Copy: A Data Subject can request a copy of his/her personnel file. If a copy is issued, this will be recorded in the personnel file.
- 4.6 Data portability: A Data Subject can ask Dümmen Orange to supply his/her Personal Data in a structured, standard and machine-legible form, or to transfer this Personal Data to another organisation.

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