

Privacy Notice for Recruitment Purposes

Last updated: 22 May 2024

Thank you for considering applying for a position with Datenna. To ensure transparency and protect your privacy, we have developed this notice outlining how we collect, use, and protect your personal information during the recruitment process.

When you participate in our recruitment process, the terms of this Privacy Notice will apply for the processing of your personal data. Under applicable law, "processing" is a broad term that includes all types of activities that can be performed with data, such as collection, storage, use and erasure. Likewise, "personal data" is also a broad term that includes all types of information that can be related to you.

For your ease of reference, the content of this notice is divided among the following sections. If you have any questions about the information contained in this notice, please feel free to reach out to us using the **Contact information** provided at the bottom of this page.

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1. Personal data we collect

For our own recruitment purposes, we may collect and process the following types of personal information about you:

- **Contact information:** such as your name, address, email address, and phone number
- **Social media (professional):** portfolios, shared or publicly available, as well as other LinkedIn profile data made publicly available by you
- Professional qualifications and experience
- Employment history and references
- Education history
- Cover letter
- Any other relevant information provided by you in CVs, résumés, during interviews, or those provided by the references you indicate

Skills and Competencies. Datenna has partnered with Assessio to perform an assessment of certain skills and competencies of job applicants. This step of the process includes a mix of problem-solving activities and an assessment of the candidate's soft skills. The results of the assessment may form part of the final interview process as a discussion point but will not be individually used by Datenna to make hiring decisions. You can learn more about Assessio and how they may process your data [here](#).

Certificate of Good Conduct. Due to the confidential nature of certain information to which you might have access in the event that you are offered a position at Datenna, you might be required to provide us with a Certificate of Good Conduct (VOG) issued by the Dutch Ministry of Justice and Security. If this is the case, you will be timely informed by us prior to your onboarding. You can learn more about the VOG [here](#).

2. How we collect your personal data

We obtain candidate data from the following sources:

- **Direct application:** Information provided by you through our online application process.
- **References:** Information provided by the references you indicate during the recruitment process.
- **Recruitment agencies:** Information shared with us by recruitment agencies acting as intermediaries to find suitable candidates on our behalf. Recruitment agencies will only

share your information with us once you have agreed to be considered for the position advertised by the agency.

- **Professional networking platforms:** Publicly available information on professional networking platforms, like LinkedIn or Indeed, when you have made your profile visible for job opportunities.
- **Referrals:** Information provided by employees who refer candidates for potential employment at Datenna.
- **Career fairs:** Information provided by you during an encounter at a career fair.

3. How we use your personal data

When, we may use your personal data for the following purposes:

- **Assessing your application:** To evaluate your suitability for the position applied.
- **Communication:** To contact you regarding your application, to provide you with updates on the recruitment process, and to present new opportunities.
- **Onboarding Facilitation:** If you are offered a position at Datenna (and provided you accept the offer), we will process your data to enter into a contract with you and initiate your onboarding process.
- **Security and Fraud Prevention:** To ensure the security of our operation, our offices, and to verify information provided in your application, including by contacting references you indicate.

Please note that data collected for the purposes listed in this section may also be used for secondary purposes, as long as any such secondary use is compatible with the original purpose. Examples of secondary uses of personal data collected for the purposes listed above include statistical analysis of data, improvement of existing processes to which the data relates, and organisational planning.

4. Lawfulness of processing

In the context of our recruitment processes, your personal data will be processed with the main purpose of assessing if you are a suitable candidate for the role for which you have applied. As a result, the processing of your personal data is necessary before we can enter into a contract with you. If you choose not to provide the information requested from you, we may become unable to assess your application in its entirety or enter into a contract with you.

In cases where we seek your consent, you will be clearly informed of the purposes for which we intend to process your personal data. Know that if you do consent, you may withdraw your consent at any time. To learn more, see below for more information on **Your rights and choices**.

In certain situations, we might have a legitimate interest to process your personal data. This might be the case when we process your personal data for security or fraud prevention purposes, as well as when we collect data publicly available data of potentially suitable candidates so that we might contact them for a job opportunity fitting their profile.

Depending on your particular circumstances, you may have grounds to object to our processing of your personal data based on the legitimate interests we pursue. To understand how you can exercise the right to object, please refer to the **Your rights and choices** section of this notice. If you want to know more about our use of personal data for legitimate interests, please feel free to reach out to us using the **Contact information** at the bottom of this page.

5. Recipients of personal data

The data we process for the purposes of our recruitment process is not sold or deliberately disclosed to third parties. However, due to the technical and organisational complexity of our operation, we rely on trustworthy service providers to continuously improve our recruitment processes.

Whenever we share personal data with service providers, vendors or other third parties acting on our behalf, we ensure that a contract is put in place with the relevant party to apply strict confidentiality and data protection provisions according to the applicable legal requirements. As a rule, third parties acting on our behalf (for example, to provide a service), are only authorised to process personal data controlled by us according to our instructions and only for the limited purposes of the services in question.

Personal data processed for recruitment purposes may need to be shared with the following categories of recipients, particularly to support our operation, provide critical data processing and other specialised services and assets:

- Organisations licensing and providing access to the software we need for our recruitment processes, including [TalentIndex](#), and [LinkedIn](#).
- Recruitment agencies directly involved in your recruitment process.
- Providers of cloud computing, data storage and processing services.

- Law enforcement and other competent authorities in cases where we are legally required to provide personal data, including when we receive lawful requests for access to personal data (for example, in the course of an investigation by an authority).
- Other parties (such as consultants, legal advisors and the like) whenever we consider that sharing personal data is reasonably necessary to exercise rights or to protect the property or other compelling interests of Datenna, our employees, customers or other concerned third parties.

In addition, internal departments involved in the different stages of your recruitment process may have access to your personal data to the extent necessary to allow them to fulfil their duties. This might be the case, for example, for managers of the department within which the position you applied for is allocated, and for our operations team to welcome you and accommodate in-person interviews etc.

Transfers of Personal Data Outside the EEA. Although Datenna's operations are primarily concentrated within the European Economic Area (EEA), it is possible for personal data under our control to be transferred outside the EEA. This might occur, for example, where some of our service providers process a portion of the personal data we control in data processing facilities (such as servers) that are physically located outside the EEA.

Transfers of personal data outside the EEA under Datenna's control will only occur if they are strictly necessary for the purposes outlined in this notice, and if the transfers comply with the applicable laws. In practice, this means that transfers can only be carried out if at least one of the following applies:

- The European Commission has decided that the country of destination provides an adequate level of protection for personal data (see [here](#) for a list of such countries);
- A legally-binding document addresses all necessary requirements to authorise the transfer, such as Standard Contractual Clauses issued by the European Commission (see [here](#) for a copy of the clauses); or
- The transfer is permitted under applicable data protection laws due to another legally valid mechanism.

6. Data retention and erasure

We retain your personal information for as long as we consider it relevant for our recruitment purposes. If your application is unsuccessful, we may keep your data for future opportunities unless you request otherwise. Please refer to the **Your rights and choices** section of this notice to learn more.

In general, we may keep data related to unsuccessful applications for up to twelve (12) months counted as of the date of the application. As we continue to grow as a company, we believe that this serves the legitimate interests of both Datenna and job applicants in potentially finding a suitable position for someone who was unsuccessful in a previous application within such period, as well as in allowing us to establish contact to invite the candidate to initiate a new application.

In cases where we are obliged to retain personal data to comply with specific legal or regulatory requirements, we take the necessary measures to ensure the prolonged retention of the relevant data to meet such requirements. After personal data is no longer necessary for our recruitment purposes or for legal purposes (such as legal compliance and the exercise of legal rights in case of disputes), data may be still stored for an additional minimal period in our backup environments for operational and security purposes. After such period has lapsed, personal data that is no longer necessary is either securely and irreversibly destroyed, or anonymised so that it cannot be linked to the individuals to whom it originally related.

7. Security of processing

Datenna takes information security very seriously. We take appropriate measures to protect personal data from unauthorised access, use, disclosure, alteration, loss, and destruction. Only authorised personnel who have a need to know may have access to your data for the fulfilment of legitimate business purposes. We have implemented and continue to improve our security policies and controls to ensure that sufficient technical, physical, and organisational measures are in place with the purpose of providing an appropriate level of security for your data. Existing measures include encryption of personal data and enforcement of access controls in certain systems and environments, and other controls aimed at ensuring the ongoing confidentiality, integrity, availability, and resilience of our data processing systems.

We have procedures in place to swiftly respond to security incidents, including those potentially leading to personal data breaches. Such processes are recurrently subjected to testing and improvement cycles. In addition, we are prepared to take all necessary measures to disclose a security incident to the competent authorities and/or to potentially affected individuals in the event that we are legally required to do so.

8. Your rights and choices

We are committed to respecting the rights you have over your data. While we process your data for the purposes described in this notice and, depending on your particular circumstances, you have the right to request the exercise of the following rights:

- Access to your personal data
- Update or correction of your personal data
- Erasure of your personal data
- Objection to or restriction of our processing of your personal data, including in cases where we process your personal data based on a legitimate interest
- Withdrawal of any consent given for our processing of your personal data
- Transfer of your personal data to a third party selected by you

Exercising Your Rights. To request either the update of your personal data or its erasure in the context our recruitment purposes, you may do this directly by using the automated features accessible via the links included in the e-mails you receive from us throughout your application process. If for some reason you are unable to access such automated features, you may also refer to the procedure explained below and contact us directly for this purpose.

If you would like to request the exercise of any of the other rights listed above, please send an e-mail to privacy@datenna.com. Your request will be confidentially processed by our Data Protection Officer. Depending on the scope of your request and of your particular circumstances, we may have legitimate reasons not to process your request, or to process it only partially. Whenever this is the case, you will be informed accordingly.

If you are not satisfied with the information you receive after having contacted our Data Protection Officer, note that you also have the right to lodge a complaint with your local supervisory authority (listed by jurisdiction [here](#)) or with Datenna's lead supervisory authority, the *Autoriteit Persoonsgegevens*, in the Netherlands ([here](#)).

9. Changes to this notice

We may update this privacy notice as needed to reflect changes in our internal processes, technologies, and generally to improve the information provided to you. Any changes will be effective immediately upon posting. If substantive changes with a potential to affect your rights and freedoms are planned and we have reasonable means of contacting you (for example, your e-mail address), we will communicate such substantive changes to you before we implement them into this notice.

10. Contact information

Datenna is a private organisation headquartered in The Netherlands, subject to EU and Dutch law. Our corporate identity and contact details are listed below:

Datenna B.V.
Keizersgracht 2
5611 GD Eindhoven, The Netherlands
recruitment@datenna.com

Datenna is the controller responsible for deciding the means and purposes of processing of personal data described in this notice. If you have any questions or concerns regarding this notice, our data practices, or your particular circumstances, you may confidentially contact our Data Protection Officer via e-mail at privacy@datenna.com.

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