PRIVACY STATEMENT OF LTO ARBEIDSKRACHT

LTO Arbeidskracht

This privacy statement applies to the processing of personal data by LTO Arbeidskracht B.V. (CoC 09173521), hereinafter referred to as 'LTO Arbeidskracht'.

The services provided by LTO Arbeidskracht

LTO Arbeidskracht provides payrolling, recruitment and selection-related services and also offers courses and healthcare insurance to employees and employers in the agriculture sector. Job seekers can register with us for inclusion in an online database of job seekers, which makes it easier for employers to find them.

Processing of personal data by LTO Arbeidskracht

LTO Arbeidskracht places great importance on protecting personal data. LTO Arbeidskracht respects your privacy and ensures that your personal data are always treated as confidential and handled in accordance with applicable privacy legislation.

Processing purposes

LTO Arbeidskracht will process your personal data for the following purposes:

<u>For job seekers that have registered for inclusion in the database</u>

1. To make available data you have provided to potential employers via the online database, but only with your consent;
2. To generate statistics and improve the website.

<u>For employees who use the courses on offer</u>

3. To provide group courses;
4. To exchange all of the data required with training organisations with which LTO Arbeidskracht collaborates.

<u>For employees who have taken out healthcare insurance via LTO Arbeidskracht</u>

5. To register and deregister healthcare insurance with your consent;
6. To implement healthcare insurance;
7. To apply for healthcare benefit with your consent;
8. To answer questions you have about your rights and obligations.

<u>In all situations</u>

9. To perform the contract(s) entered into with you;
10. To be able to contact you and respond to questions you have asked;
11. To keep records and carry out other internal management activities;
12. To calculate, record and collect amounts owed, including the placement of these amounts with third parties for collection purposes;

13. To improve the LTO Arbeidskracht website and services;
14. To be able to inform you of the activities of LTO Arbeidskracht;
15. To comply with statutory obligations, like the obligation to keep and retain records;
16. To hear disputes and instruct the performance of an accounting audit.

Legal basis for processing personal data

We will not process any more data than necessary for the conclusion and performance of a contract, the fulfilment of statutory obligations and all legitimate interests for the purpose of our internal management and normal business operations. In all other situations, we will ask you for consent to process your personal data.

Therefore, the legal basis for the aforementioned processing purposes will be based on:

- the precontractual measures to be taken at your request and/or to perform a contract entered into with you (Article 6(1)(b) of the GDPR); and/or
- the need to comply with statutory obligations (Article 6(1)(c) of the GDPR); and/or
- the need to represent the legitimate interests of LTO Arbeidskracht or a third party (Article 6(1)(f) of the GDPR); and/or
- the consent given by you (Article 6(1)(a) of the GDPR).

Statutory provision

Whenever we ask you for personal data, we will inform you whether the provision of data is necessary or a statutory requirement and also what the (possible) consequences will be if the data are not provided. The starting point will always be that LTO Arbeidskracht will not process any more personal data than necessary for the purposes described above.

Exchanging personal data with third parties

LTO Arbeidskracht will provide your data to the following partners and third parties:

1. If you have an interest in Payrolling: we will transfer your contact details to Nedflex;
2. If you are registered in our vacancy database: we will transfer your data to Seasonalwork.NL and to all employers with access to the database, depending on the search criteria used by them;
3. If you want to do a course: we will transfer your contact details to Lentiz Cursus & Consult;
4. If you are insured via the scheme offered by LTO Arbeidskracht (Seizoenarbeid [Seasonal Work]): we will transfer the personal data of the persons to be insured to the healthcare insurance provider in question, being HollandZorg or Zilveren Kruis, via a secure digital link;
5. If you apply for healthcare benefit via LTO Arbeidskracht: we will transfer your personal data to the Benefits Service department of the Dutch Tax and Customs Administration.

Each receiving party will process the data in accordance with its own privacy policy. You can request information about this policy from the party in question.

For the rest, LTO Arbeidskracht will not provide any personal data to third parties that wish to use the data for their own purposes. The above will only not apply if:

- you gave prior consent for your data to be provided to a third party; or
- LTO Arbeidskracht is required to provide data by law.

Retention period

In principle, your data will only be retained for the statutory retention period, unless there are legitimate reasons to retain them longer (in the case of a long-term conflict, for example).

Securing personal data

LTO Arbeidskracht will take (or instruct another party to take) appropriate technical and organisational measures to protect your data against loss or any form of unlawful processing. Various measures have been put in place in this respect, including the encryption of data, encrypted communication and the treatment of data as confidential.

Your rights

By law, you have the following rights:

Right of access

You have the right to access the personal data about you that LTO Arbeidskracht has processed.

Right to rectification and erasure

You will have the right to have data altered or even erased if it is not correct (any more) or if the processing is not justified (any more).

Right to object

The right to object entitles you to object to certain personal-data processing operations based on your specific situation. You will have this right in respect of all processing operations that are not based on (1) your consent, (2) precontractual measures that you have requested, and/or performance of the contract entered into with you, (3) compliance with statutory obligations or (4) the protection of vital interests of yourself or others.

If you object to the use of your personal data to inform you of activities of LTO Arbeidskracht and similar (‘direct marketing’) processing operations, we will always accept this objection. Your data will then no longer be used for direct marketing purposes.

If you object to your personal data being subject to other forms of processing, we will consider whether or not we are able to meet your objection. In this situation, LTO Arbeidskracht will be required to demonstrate that it has a legitimate interest in continuing to process your personal data despite your objection. If we are unable to do so, we will stop processing your personal data as required.

Right to restriction

You will also be entitled to restrict the processing of your data in certain circumstances. In other words, LTO Arbeidskracht will temporarily 'freeze' the processing of your data. You will be able to invoke this right in the following four situations: (1) in anticipation of the assessment of a rectification request, (2) if data should actually be erased but you do not wish them to be erased, (3) if LTO Arbeidskracht no longer has the data, but you need them (to prepare) for legal proceedings, and (4) in anticipation of the assessment of an objection.

Right to data portability

You have the right to receive (or have returned to you) the data you previously provided to LTO Arbeidskracht in a common file format. This right will only apply for the personal data that we process on the basis of your consent or a contract entered into with you. This right will also only apply for data that we are already processing in a digital format (so not for analogue processing operations). You will then be free to transfer the data in question to another party.

If a link exists between our systems and the systems of the third party you want to transfer your data to (or instruct the provision of data to), we may be able to transfer your data directly to the said party on your behalf. Contact LTO Arbeidskracht for more information about the possibilities open to you in this respect.

Withdrawing consent

We ask you for your consent for certain processing operations (applying for healthcare insurance, for example). You will always have the right to withdraw any consent you provide. We will then stop processing your personal data immediately.

Your withdrawal of consent will not have retrospective effect. As such, all processing operations prior to the date on which consent is withdrawn will continue to be lawful.

We would also like to point out that if you withdraw consent, we will no longer be able to support you with the processes for which you previously gave us your consent. You will then be entirely responsible and liable for the performance of the said activities.

Exercising your rights

You will be able to exercise your rights free of charge, unless you abuse these rights. You can exercise your rights by contacting us via the contact details below.

Response times

In principle, we will respond to your questions and requests within one month. If we find that the complexity of a question or request and/or the number of questions or requests means that we need more time - which could extend up to three months - we will inform you of this fact within one month.

Identification

We may ask you for further proof of your identity whenever you submit a question or request. We will do this to avoid providing personal data to the wrong party or wrongly making changes to your personal data during the processing of your data. To ensure that requests are processed as quickly as possible, please include a copy of your identity document with each request.

Individual consideration of each request

We would like to point out that the rights described above are not absolute rights. There may be situations that prevent us from complying with a request. We will always assess each request on its own merits. If we have decided not to comply with a certain request (or are not able to do so), we will inform you of this, giving you reasons for non-compliance. You will be able to object to this decision in court in this situation.

However, the right to object to the use of data for direct marketing purposes is an absolute right. Requests to deregister from our commercial communications will always be honoured, regardless of the situation.

Supervisory authority

You will also always be free to submit a complaint to the supervisory authority. The supervisory authority in respect of privacy legislation is the Dutch Data Protection Authority (*Autoriteit Persoonsgegevens*). You will find the contact details for the Dutch Data Protection Authority on the following website www.autoriteitpersoonsgegevens.nl.

Questions

Please feel free to contact us with any questions you have about the personal data processed by us. If you have any privacy-related questions, contact us via the contact details provided below.

Changes

Changes may be made to this Privacy Statement at any time. All such changes will be announced on the LTO Arbeidskracht website.

LTO Arbeidskracht will be permitted to process your personal data for new purposes that have not been specified in this Privacy Statement yet. In this situation, we will inform you of the changes to our regulations for the protection of personal data and give you the chance to refuse to participate before using your data for the new purposes in question.

Contact details

If you have any questions about this Privacy Statement or our privacy policy, or would like to invoke one of your statutory rights, please contact us via the contact details below:

LTO Arbeidskracht

Postal address: P.O. Box 100

5201 AC Den Bosch

Visiting address: Onderwijsboulevard 225
5223 DE Den Bosch

Telephone: 088 - 472 42 00
E-mail: info@ltoarbeidskracht.nl