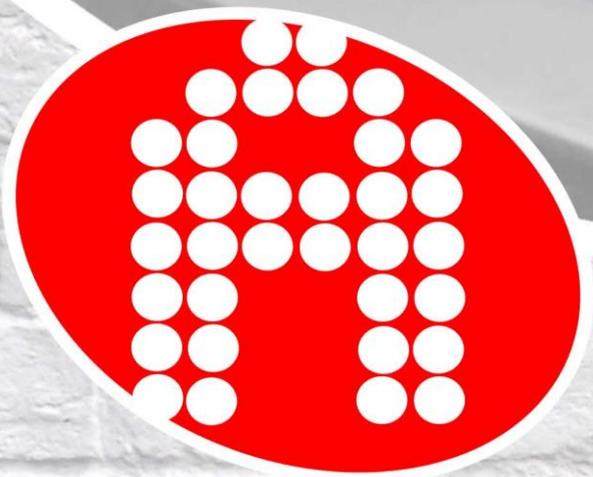




# PRIVACY REGULATIONS



**alert** HR Solutions

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## Article 1. General and definitions

- 1.1 Unless expressly provided otherwise below, terms in these regulations are used within the meaning of the General Data Protection Regulation (GDPR).
- 1.1.1 **Personal data**  
Any information concerning an identified or identifiable natural person.
- 1.1.2 **Processing of personal data**  
Every action or set of actions related to personal data, used for the performance of the services of Alert HR Solutions B.V.
- 1.1.3 **Controller**  
The management of Alert HR Solutions B.V.
- 1.1.4 **Data protection officer personal data**  
The person who, under the responsibility of the management of Alert HR Solutions B.V., is responsible for the daily processing of personal data.
- 1.1.5 **User of personal data**  
The person who is authorised as an employee, data processor or otherwise to use personal data.
- 1.2 **Employee**  
All persons working in the organisation of Alert HR Solutions B.V., whether or not on the basis of an employment contract.
- 1.2.1 **Data subject**  
The person whose personal data have been recorded.
- 1.2.2 **User company**  
A natural or legal person who has given Alert HR Solutions B.V. an assignment.
- 1.3 **Access to personal data**  
Authorising people, working in the organisation of Alert HR Solutions B.V., to consult and possibly mutate personal data.
- 1.3.1 **Transmission of personal data to third parties**  
Disclosing or making available personal data outside the organisation of Alert HR Solutions B.V.
- 1.3.2 **Third parties**  
All persons, hired and not belonging to the organisation, who perform work for shorter or longer periods by order of Alert HR Solutions B.V.

## Article 2. Scope

- 2.1 These regulations apply to all processing of personal data within Alert HR Solutions B.V.

## Article 3. Purpose of the processing of personal data

- 3.1 Purpose of the processing of personal data is the recording of and having available personal data, which are necessary for the execution of the agreement.
- 3.2 No personal data will be processed for purposes other than indicated in the regulations. The processing of personal data only takes place in accordance with this objective.
- 3.3 The controller does not retain the personal data any longer than is necessary for the purposes for which these personal data were collected and complies with the retention periods of the applicable laws and regulations.

#### **Article 4. Processing of personal data**

- 4.1 The processing of personal data to which these regulations apply is described in Appendix 1 This appendix also indicates who acts as data protection officer and which employees can use the data. This appendix forms an indissoluble whole with these regulations.
- 4.2 Special personal data are only processed if the data subject gives its consent or if a legal basis thereto exists.
- 4.3 The controller can be held liable for the proper functioning of the processing of personal data and for compliance with the provisions of these regulations. His/her actions, with regard to the processing of personal data and the disclosure of personal data, are limited by these regulations.
- 4.4 The controller is liable for any damage resulting from non-compliance with these regulations. The management of Alert HR Solutions B.V. is not liable, if a user company can be held liable for the processing of personal data.
- 4.5 The controller assigns the responsibility for the daily care for the processing of personal data to the data protection officer.
- 4.6 The controller takes the necessary measures to promote the accuracy and completeness of the recorded data. He/she also provides the necessary technical and organisational facilities to protect the personal data against loss or damage to the data and against unauthorised access, modification or provision thereof.
- 4.7 Website visitors may visit our page(s) without providing any personal data. However, the controller collects certain non-identifiable automatic information about the users of our website(s). The collected data are used to optimise the content of the website(s) to the wishes and needs of the visitors of our website. website(s).
- 4.8 Our website(s) may contain references and/or hyperlinks to one or more websites of others. This privacy policy does not apply to these websites.

#### **Article 5. Access to personal data**

- 5.1 Only the employees have access to the personal data insofar as this is necessary for the performance of their duties.
- 5.2 Anyone who has access to personal data has a confidentiality obligation with regard to the personal data of which he/she has become aware based on that access.
- 5.3 Third parties, who have been hired by Alert HR Solutions to perform work, have access to the processing or personal data, insofar as this is necessary for their duties and they are, through the contractual agreement, bound to the confidentiality obligation.

#### **Article 6. Protection of the personal data**

- 6.1 Personal data are handled carefully. To this end, the data are sufficiently protected.
- 6.2 The controller, in consultation with the data protection officer, will draw up rules for the protection of the personal data.

#### **Article 7. Data leaks**

- 7.1 The controller has a reporting obligation in the event of a data leak and must report this to the Personal Data Authority within 72 hours
- 7.2 The controller must report a data leak to the data subject if this person may suffer damage.

## Article 8. Provision of data

- 8.1 Unless this is necessary for the implementation of a statutory regulation, or if it concerns a case as mentioned in article 8.3. for disclosure of personal data to third parties, the specific written consent of the data subject is required.
- 8.2 Within the organisation of Alert HR Solutions B.V., personal data may be disclosed without the consent of the data subject, if and insofar as this is necessary for their performance, to:
- Those who are directly involved in the actual guidance of or advice on the data subject or are in other ways directly involved in the execution of a concrete assignment of the user company;
  - Persons who are responsible for the direct professional supervision of the data subject or persons involved in handling complaints from the data subject;
  - The controller, in connection with his/her general responsibility as controller.
- 8.3 Outside the organisation of Alert HR Solutions B.V., personal data may be disclosed without the permission of the data subject, if and insofar as these are necessary for their performance, to:
- User companies in the framework of the agreed service;
  - Suppliers insofar as these data are required for an efficient execution of the assignment;
  - Persons who, on the basis of an agreement thereto concluded, approved by the controller, are responsible for the maintenance and preservation of the equipment and software for the benefit of the personal data and to the extent access to the data is necessary in respect of the performance of their duties;
  - Third parties who, on the basis of an agreement concluded for this purpose, approved by the controller, perform work for Alert HR Solutions B.V. and insofar as these data are necessary to realise an efficient execution of the assignment.

## Article 9. Access to recorded data

- 9.1 For the provision of copies, a fee may be charged if the request is unfounded or excessive.
- 9.2 A request as referred to in this article will be complied with within four weeks of receipt thereof.
- 9.3 The data requested by the data subject or his/her authorised representative are not provided until after, in the opinion of the party to whom the request has been forwarded, it is sufficiently established that the party requesting the data is the data subject or his/her authorised representative. This must take place through valid identification.
- 9.4 The data protection officer may refuse to comply with a request referred to in this article, insofar as this is necessary due to important interests of others than the applicant, including the organisation of the controller.
- 9.5 The data subject has the right to access to and copy of the data relating to his/her person. He/she must submit a written request thereto to the data protection officer via [privacy@alerthrsolutions.com](mailto:privacy@alerthrsolutions.com) The latter will pass on the request to the user, on whose initiative the relevant data have been collected, its substitute or successor.

## **Article 10. Supplementation, rectification or destruction of recorded data**

- 10.1 If requested, the recorded data will be supplemented by a statement issued by the data subject with regard to the recorded data.
- 10.2 If any recorded data are factually incorrect, incomplete for the purpose of the processing or irrelevant, or contrary to a statutory regulation of the processing, the data subject must submit a written request to the data protection officer as to what the correction to be made implies. The data protection officer shall not decide before the officer who collected the data, or its substitute or successor, has been heard.
- 10.3 Within two weeks of receipt of the request, the data protection officer shall inform the applicant in writing whether or to what extent the request for correction or destruction will be met. A refusal is reasoned.
- 10.4 Data will not be destroyed if it is reasonably plausible that the retention is of considerable importance for any other party than the data subject, as well as insofar as retention is required on the basis of a statutory provision.
- 10.5 The data protection officer ensures that a decision to supplement, correct or destroy shall be executed as quickly as possible.
- 10.6 In case of destruction of data, a statement shall be included in the data, that data have been destroyed at the request of data subject

## **Article 11. Right to object**

- 11.1 The data subject has the right to have personal data blocked insofar as these are used for commercial purposes to offer products and services, the so-called right of objection.
- 11.2 The data subject submits the right to object in writing to Alert HR Solutions B.V. The address for submission to Alert HR Solutions B.V. is stated in the communication.

## **Article 12. Retention periods**

- 12.1 Subject to any statutory requirements, the controller determines how long the personal data will be retained. Unless otherwise stipulated, the retention period ends seven years after the last contact with the data subject.
- 12.2 If the retention period has expired, the relevant personal data from the processing of personal data will be removed and destroyed.
- 12.3 After termination of the agreement concluded with the user company, all information, data and/or results, which can be traced back to the natural person, will be made available to the user company upon termination of the mediation for clients.

## **Article 13. Complaints**

- 13.1 If the data subject is of the opinion that the provisions of these regulations are not complied with or if he has other reasons to complain, he must contact the controller in writing by email: [privacy@alerthr.com](mailto:privacy@alerthr.com), or by sending a letter to Alert HR Solutions B.V., Parklaan 2a, 6131 KG Sittard.
- 13.2 The controller will take a decision within four weeks of receipt of the complaint. The decision is reasoned. The complaint is dealt with in accordance with the complaints regulations.

#### **Article 14. Final provisions**

- 14.1 Without prejudice to any statutory provisions, these regulations are valid for the entire duration of the processing of personal data.
- 14.2 These regulations may be amended by decision of the controller.
- 14.2.1 The regulations entered into effect on 1 November 2002. The regulations can be consulted at Alert HR Solutions  
B.V. If so desired, a copy of these regulations can be obtained.

## Appendix 1

This appendix forms a whole with the privacy regulations of Alert HR Solutions B.V.

Alert HR Solutions B.V. is familiar with electronic and paper data processing. In principle, an electronic file is created for every temporary agency worker or client. This is recorded in the computer. In addition, paper records from the clients will be maintained. This is for daily use in particular.

### Personal data

Alert HR Solutions B.V. uses personal data to provide you and our user company with the agreed service.

Partly, we receive the personal data from our user company with whom we have entered into an agreement.

Partly, personal data are processed as a result of our own services.

Alert HR Solutions therefore has personal data available at two levels:

- 1 Information that we receive from the user company.

Depending on the service that Alert HR Solutions B.V. provides on a contractual basis to a user company, Alert HR Solutions B.V. receives data from a user company. On the one hand it concerns names, addresses and places of residence, possibly with an additional information. On the other hand, it concerns additional data, necessary for the assignment. Here, for example, you can think of your submitted application or the re-integration dossier, already registered with the user company. No more data will be provided by a user company to Alert HR Solutions B.V. than strictly necessary for the execution of the assignment. In doing so, a user company is obliged to report this transmission of data to you.

- 2 Data resulting from the services provided by Alert HR Solutions B.V.

With the data that we receive from a user company as a basis, we develop, often together with you, new personal data. For example, we advise a user company about your submitted application. This often involves a (medical, psychological or other) diagnosis. But we also maintain all kinds of contacts with you and third parties. You should think of an employer or a training institute when it comes to reintegration, for example. When it comes to healthcare, you can, for example, think of contact with a healthcare provider. All these client and other contacts are often stored in the computer. This also means that you yourself provide us personal data, for example when you call us or provide us with information in another way.

### Users

As users of personal data are considered:

Physicians, labour experts, reintegration experts, psychologists, ergonomic advisers, indication consultants, consultants, company trainers, legal advisers, administrative employees and other professional staff to be appointed in the future.

### Electronic data

All users have access to electronic data with the exception of medical data. The medical data are only accessible to those who have been authorised thereto.

### Data contained in a paper format

Data contained in a paper format are stored in a file. The files are assigned to a specific user or group of users. These users, the substitutes or successors, are responsible for careful management of the files assigned to him/her. Other employees have access to these files only to the extent that this is necessary for the performance of their duties.