



# Privacy Policy for Candidates – CV



## Document Version History

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## Privacy Policy for Candidates – CV Management

### Who is the data controller?

The data controller is Quistor Management B.V., with address at Steenbergsestraat 49, 4611 TD, Bergen op Zoom, the Netherlands, and e-mail: dpo@quistor.com.

We use the **Workable Software Ltd.** platform as an applicant management tool. Workable acts as a processor in accordance with Article 28 of the GDPR and only processes the data on our instructions.

### How do we get your data and what do we use it for?

Your data may have been obtained through:

- Public profiles on LinkedIn or other professional platforms.
- Spontaneous applications submitted via our web form or link.
- CVs sent by email.

We use this information CV, contact, professional & educational details to:

- Evaluate your professional profile.
- Manage your participation in current or future hiring processes.
- Contact you for interviews or opportunities.

Before processing your data on our Workable platform, we ask you for your **explicit consent**.

### What is the legal basis?

The legal basis for processing your data is your explicit consent (Article 6.1.a GDPR), requested prior to processing. You can withdraw your consent at any time, without affecting the lawfulness of the previous processing.

## Who do we share your data with?

We share your information with our technology provider **Workable Software Ltd.**, (see **ANNEX I**) who acts as a processor. This platform allows us to organize and manage selection processes efficiently and securely.

No other third-party transfers, unless legally required.

Workable does not perform automated decision making on candidate suitability—final decisions are always made by Quistor staff.

## How long do we keep your data?

Your personal data will be retained:

- During the validity of the selection process.
- Up to 2 years after the last contact with you, unless you ask us to delete it.

You can request the deletion of your profile at any time. [hr@quistor.com](mailto:hr@quistor.com)

## What are your rights?

You have the right to:

- Access, rectify, erase, object, restrict, and port your data.
- Withdraw consent anytime—this will end your participation in the recruitment process.

You can exercise these rights by contacting: [\*\*dpo@quistor.com\*\*](mailto:dpo@quistor.com)

## Data Transfer Outside the EEA

Workable hosts data within the EEA. If they use non EEA sub processors, standard contractual clauses are in place to ensure GDPR compliance.

## Is it mandatory to provide your data?

You are not obliged to provide your personal data, but without them we will not be able to assess your application or include you in our selection processes.

The inclusion of your information on Workable depends solely on your informed consent.

## **Complaints**

You may file a complaint with Quistor's Data Protection Officer ([\*\*dpo@quistor.com\*\*](mailto:dpo@quistor.com)) or directly with your local supervisory authority.

## 1. ANNEX I: Workable Recruitment Privacy Notice Template for Customers

**QUISTOR MANAGEMENT B.V.**, a company registered and existing under the laws of The Netherlands with its registered office at Steenbergsestraat 49, 4611 TD, Bergen op Zoom, the Netherlands; (hereinafter referred to as “**Quistor**”).

(“We”, “Us”) are committed to protecting and respecting your privacy. This Privacy Notice (together with any other documents referred to herein) sets out the basis on which the personal data collected from you, or that you provide to Us, will be processed by Us in connection with our recruitment processes. Please read the following carefully to understand our views and practices regarding your personal data and how We will treat it.

For the purpose of the General Data Protection Regulation (“GDPR”) and the United Kingdom General Data Protection Regulation (“UK GDPR”) and the UK Data Protection Act 2018, the Data Controller is **QUISTOR MANAGEMENT B.V.**

We use Workable, an online application provided by Workable Software Limited, to assist with our recruitment process. We use Workable to process personal information as a data processor on our behalf. Workable is only entitled to process your personal data in accordance with our instructions.

Where you apply for a job opening posted by Us, these Privacy Notice provisions will apply to our processing of your personal information in addition to our other Privacy Notice which has been provided to you separately or is available on our Website.

Where you apply for a job opening via the application function on a job site or similar online service provider (“Partner”), you should note that the relevant Partner may retain your personal data and may also collect data from Us in respect of the progress of your application. Any use by the Partner of your data will be in accordance with the Partner’s Privacy Notice.

### **Your personal information**

#### **Information We collect from you**

We collect and process some or all of the following types of information from you:

- Information that you provide when you apply for a role. This includes information provided through an online job site, via email, in person at interviews and/or by any other method.
- In particular, We process personal details such as name, email address, address, telephone number, date of birth, qualifications, experience, information relating to your employment history, skills experience that you provide to Us, as well as your video in case you conduct your interview using the Video Interview feature.
- If you contact Us, We may keep a record of that correspondence.

- A record of your progress through any hiring process that we may conduct.
- Details of your visits to Workable's Website including, but not limited to, traffic data, location data, weblogs and other communication data, the site that referred you to Workable's Website and the resources that you access.
- Your video interview in case your interview was performed through the video interview feature.

### **Information We collect from other sources**

Workable provides Us with the facility to link the data you provide to Us, with other publicly available information about you that you have published on the Internet – this may include sources such as LinkedIn and other social media profiles.

Workable's technology allows Us to search various databases – some publicly available and others not, which may include your personal data (include your CV or Resumé), to find possible candidates to fill our job openings. Where We find you in this way we will obtain your personal data from these sources.

We may receive your personal data from a third party who recommends you as a candidate for a specific job opening or for our business more generally.

### **Uses made of your information**

#### **Lawful basis for processing**

We rely on legitimate interest as the lawful basis on which We collect and use your personal data. Our legitimate interests are the recruitment of staff for our business.

#### **Purposes of processing**

We use information held about you in the following ways:

- To consider your application in respect of a role for which you have applied.
- To consider your application in respect of other roles.
- To communicate with you in respect of the recruitment process.
- To enhance any information that we receive from you with information obtained from third party data providers.
- To find appropriate candidates to fill our job openings.
- To help our service providers (such as Workable and its processors and data providers) and Partners (such as the job sites through which you may have applied) improve and develop their services (including the use of aggregate data).

### **Disclosure of your information**

As set out above, we pass your information to our third party service providers, including Workable, who use it only in accordance with our instructions and as otherwise required by law.



Where you have applied for a job opening through the Indeed Apply functionality, We will disclose to Indeed certain personal data that We hold, including but not limited to a unique identifier used by Indeed to identify you, and information about your progress through our hiring process for the applicable job opening, as well as tangible, intangible, visual, electronic, present, or future information that we hold about you, such as your name, contact details and other information involving analysis of data relating to you as an applicant for employment (collectively "Disposition Data"). Indeed's Privacy Notice in respect of Indeed's use of the Disposition Data is available on Indeed's website.

Where you have applied to a job opening through another service provider, we may disclose data similar to the Disposition Data defined above to such service provider. The service provider shall be the data controller of this data and shall therefore be responsible for complying with all applicable law in respect of the use of that data following its transfer by Us.

## **How We store your personal data**

### **Security**

We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where We are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although We will do our best to protect your personal data, We cannot guarantee the security of your data transmitted through any online means, therefore any transmission remains at your own risk.

### **Where We store your personal data**

Where we store your personal data in our own systems, it is stored [ *insert place, e.g. on our secure servers within the EEA* ].

The data that We collect from you and process using Workable's Services may be transferred to, and stored at, a destination outside the United Kingdom ("UK") or the European Economic Area ("EEA"). It may also be processed by staff operating outside the UK or the EEA who work for Us or for one of our suppliers. Such staff maybe engaged in, among other things, the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.

In particular, your data may be accessible to i) Workable's staff in the USA or ii) may be stored by Workable's hosting service provider on servers in the USA as well as in the EU. The USA does not have the same data protection laws as the United Kingdom and EEA. A Data Processor Agreement has been signed between

Workable Software Limited and its overseas group companies, and between Workable Software Limited and each of its data processors. These data processor agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

If you would like further information please contact Us (see 'Contact' below). We will not otherwise transfer your personal data outside of the United Kingdom or EEA or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

### **How long We keep your personal data**

We will hold all the data for two (2) years.

*Your personal information will be deleted on one of the following occurrences:*

- *deletion of your personal information by you (or by another person engaged by you); or*
- *receipt of a written request by you (or another person engaged by you) to us.*

### **Your rights**

Subject to local data protection laws and in particular under the GDPR and the UK GDPR, you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address
- require Us to correct any mistakes in your information which We hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to Us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the UK GDPR](#).

If you would like to exercise any of those rights, please:

- contact us using our contact details below
- let Us have enough information to identify you,
- let Us have proof of your identity and address, and
- let Us know the information to which your request relates.

### **How to complain**

We hope that We can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) and the UK GDPR also gives you right to lodge a complaint with a supervisory authority, in particular (under the GDPR) in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

### **Contact**

All questions, comments and requests regarding this Privacy Notice should be addressed to [dpo@quistor.com](mailto:dpo@quistor.com)

# QUISTOR

An **ITG** Company



[www.quistor.com](http://www.quistor.com)



[info@quistor.com](mailto:info@quistor.com)