

## Privacy Policy - Privacy notice for recruitment 2018

With this privacy policy we aim to cover our compliance with the May 25, 2018 General Data Protection Regulation DPR to the best of our knowledge. If you find any discrepancies and/or have question concerning the described processes, please contact us directly. Please note that the latest version of this policy is available through our website.

### *Terminology*

In respect to the recruiting function, this Policy refers to:

**Candidates or “data subjects.”** Candidates are the data subjects because they can be identified through personal data they give to companies. For example, their resumes may include their names, physical addresses or phone numbers. This Policy exists to protect this kind of data.

**Employers, or “data controllers.”** Employers, or recruiters who serve as their company’s main representatives to candidates, determine the purpose of collecting candidate personal data. This makes them the data controllers who are fully responsible for protecting candidate data and using it lawfully.

**Clients.** A client is considered any company with whom SEMARE has an agreement in place to conduct a search activity on their behalf. This includes active searches for vacancies and/or talent mapping exercises. Under the GDPR, we are responsible for whom we do business with and therefore we expect and ensure that every client SEMARE engages with to be fully compliant with this law.

**“Job Seeker.”** A job seeker is a natural person interested in talking to SEMARE experts about possibly finding a new position in general. Per definition contact with SEMARE is always initiated by the job seeker itself hence at the time of contact no active search assignment may be in place.

### *Data Protection Officer (DPO)*

In case you would like to contact us regarding the below described privacy policy please call or mail our office through reception or directly to our Data Protection Officer (DPO)

SEMARE  
P. Hans Frankfurthersingel 282  
1060 TR Amsterdam  
the Netherlands  
[info@semare.com](mailto:info@semare.com)  
T +31 20 771 9994

Data Protection Officer (DPO)  
Mr. Wouter Ordelman  
[dpo@semare.com](mailto:dpo@semare.com)

The core function of SEMARE is to help its clients to find great people. Sourcing is therefore an essential function. Sourcing requires finding and storing personal candidate data. We aim to be transparent about processing candidate data, collect data only for recruitment purposes and establish a long-term relationship with our clients and candidates based on mutual trust and integrity.

### *Statement of data usage*

As recruitment company SEMARE processes data of EU residents. SEMARE collects and processes data for recruitment purposes only. Candidate data will be collected only for agreed assignments. Processing data is limited to job related information only and always with the intent to contact sourced candidates within 30 days.

### *Data subject information*

Types of data collected typically includes, but are not limited to, contact details, social and professional profiles, education and work experience. No sensitive data such as disability information, cultural, genetic or biometric information will be processed without explicit consent in a clear and intelligible way from data subject (candidates).

### *Data sharing*

Data collected, and processed data is only shared, and limited to, the specific client on whose behalf the company, SEMARE, is conducting the recruitment assignment as well as the active recruitment consultants who are assigned by SEMARE Management to conduct the specific search or talent mapping exercise.

### *Data sources*

Data is collected through public sources such as social and professional platforms. Data can also be obtained through direct contact with potential candidates where the initial contact with SEMARE is initiated by the data subject itself i.e. job seeker.

### *Data storage period*

Data is stored during the active search period only, active is defined as the period when the assignment (or vacancy) has not yet been fulfilled + for an additional period of 4 weeks after the closing date of the search. Closing date is defined as the date on which a candidate has signed his or her new employment contract.

In contrast to the latter are job seekers as mentioned above; their data can be stored longer with explicit consent in a clear and intelligible way and with clear instructions on how to withdraw their consent if they wish to do so.

### *Data subject' rights*

These include the 'right to be forgotten', to rectify or access data, to restrict processing, to withdraw consent, to be kept informed about the processing of their data.

**the "right to be forgotten.** Candidates have the right to ask SEMARE to delete and stop processing their personal data. SEMARE will locate every place that we keep their information (e.g. spreadsheets) and delete it within one month after receiving the candidate's request.

**the right to access data and ask SEMARE to rectify it.** Candidates have the right to ask what data of theirs SEMARE holds. They can also request that we make corrections to any inaccuracies (rectify.) SEMARE will grant both requests within one month and provide candidates with a free, electronic copy of their own personal data.

Any such request can be made to the Data Protection Officer (DPO) by mail.

### *Protection of data*

No data is stored in any type external Applicant Tracking systems or any other recruitment software/services or data processors. Nor does SEMARE run any type of CRM program. Data is stored on secured and encrypted Cloud Solution compliant with today's Digital Safety Standards including that all data transfers between the Cloud servers and our local IT machines are being handled with TLS/SSL encryption. Furthermore, data is only accessible for SEMARE consultants assigned to the search and with active login & password.

### *Privacy protection by Working Principles*

**Confidentiality.** The effectiveness of our work depends on a detailed understanding of our client's strategy and style of management. We therefore respect absolute confidentiality when dealing with sensitive information provided to us about a client organization and its personnel. Confidentiality works both ways. Most of the people recommended by SEMARE are currently employed. Client companies must respect this fact and work to minimize exposure of candidates during the search and interviewing process. This means that no candidate names should be mentioned to anyone other than those individuals directly involved in the search effort. Confidential presentation material must be controlled and strictly limited to those people concerned with the selection of the candidate.

**Open relationship.** The best relationships are reciprocal and, just as we make our clients aware of any facts we discover during a search, we ask them to keep us informed of any developments which may affect the successful outcome.

**Communication.** We establish appropriate lines of communication with the client at the beginning of an assignment and use them to maintain regular contact throughout the search: by telephone, in writing, live online updates and through strategy review sessions.

**Exclusivity.** To avoid confusion in the market-place, we ask that only one recruitment procedure is followed. Thus, clients should not advertise or use any other recruitment method whilst we are working on a search and refer to us for consideration any potential candidates already known to them or presenting themselves spontaneously. Our search activity may occasionally provoke such introductions.