

## **Data handling policy of Normec VRO B.V. with regard to Inspections/Audits**

### **How does Normec VRO B.V. handle your data?**

Normec VRO B.V. attaches great value to the protection of your personal data. This document informs you about how we handle your personal data.

We do the utmost to safeguard your privacy and therefore handle your personal data with due care. For that reason, we only process the data necessary to provide our services. We will never make your data available to third parties for commercial purposes. Normec VRO B.V. in all cases conforms to the applicable laws and regulations, including the General Data Protection Regulation and the General Data Protection Regulation Implementation Act (hereinafter referred to as: the "GDPR").

### **Service Provision Normec VRO B.V.**

Our Data Protection Policy is applicable to all services provided by Normec VRO B.V. and the following inspections in particular: SNA Quality Mark (NEN 4400-1/NEN 4400-2), SNF Quality Mark, ABU membership, NBBU membership, NBBU Self-Employed Person without Employees (ZZP) Quality Mark, Control commissioned by SNCU (pursuant to a processing agreement), WAS compliance, PayChecked in Transport, NEN+/COV, Perspectiefverklaring, Bovib Quality Mark, OSB membership (Schoonmakend Nederland), PayOK and Blik op Werk.

For the purpose of the inspections or audits, personal data is being processed at various moments. This is the case when leaving data behind through our website (for example for a newsletter registration or a call back request), a request for a quotation, the conclusion of the agreement, the inspection or audit and our obligation to retain data. In this policy document for data handling we indicate per step which personal data we process and for how long we retain it, the applicable basic principles and grounds, and the security of the data. It concludes by providing you with insight in your rights and the organizational and technical measures taken by Normec VRO B.V. to protect your (personal) data in accordance with the GDPR.

Normec VRO B.V. works where relevant and possible with parties that are ISO 27001 certified. The internal working procedures of Normec VRO B.V. are based as much as possible on these standards.

The effective date and date on which these terms and conditions become valid is February 24, 2021. Any previous versions become invalid at the time of publication of a new version.

### **Questions?**

If you have any questions about the Data Handling Policy of Normec VRO B.V. or regarding our services you may contact us. You will find our contact details at the end of this document.

### **1. Request for a quotation via the website or otherwise**

When you request a quotation through the form on our website, we ask for the following information:

- Company name;
- Name;
- Email address and phone number.

We use this information to contact you about the quotation. Usually we contact you first by phone. If additional information needs to be sent to you, we use the e-mail address provided by you. We use this information exclusively for the aforementioned reason.

### **2. Concluding an agreement for an inspection or audit**

When you commission Normec VRO B.V. to carry out an inspection or audit, we ask for the following (personal) data (in addition to the data mentioned under 1) for the benefit of this agreement:

- Name contact person (if this is someone else) and position;
- Address details;
- Signature;
- Name of advisor Administration office (if applicable).

The ground for processing the data is that such is necessary for carrying out the agreement that you have commissioned. We use these data exclusively to conclude the agreement with you, to prepare the inspection, and to be able to send you an invoice. Your data will be processed in a secure environment. We do not use your data for (targeted) marketing. Your data will not be shared with third parties, other than to meet accounting and other administrative obligations.

We keep the data as long as you are our client. This means that we keep your customer profile with the data you provided until you indicate that you no longer wish to use our services or that another contact person within the company may take over this task. If you indicate this to us, we will also interpret this as a request to forget (right to oblivion).

We must retain your invoices with your (personal) information for a period of 7 years pursuant to applicable administrative obligations.

### **3. The Inspection and Report**

During an inspection or audit the inspector/auditor will (usually) process various personal data at your office. This can be your own personal data or data about (former) employees and freelancers. Which personal data this is exactly and from whom this data originates, differs per quality mark/service. This is also the case when recording the inspection/audit in a report. For each file we can provide insight into which personal data is processed. You can request this from us (see contact details at the bottom of this document).

#### 4. Ground for processing personal data and retention period

The ground for processing personal data for the purpose of our products/ quality marks is Article 6 (1) (f) of the GDPR, or: the processing is necessary for the protection of the legitimate interests pursued by the inspection body or by a third party. For the SNA, SNF, SNCU, NBBU (including NBBU (ZZP) Quality Mark) ABU, NEN+/COV, Paychecked in Transport, OSB (Schoonmakend Nederland), BOVIB, Perspectiefverklaring, PayOK and Blik op Werk the legitimate interest is: the prevention of underpayment of workers, bogus constructions and labor market fraud (Fair Labor), and more specifically: the prevention of fraud and illegality in the temporary employment industry and in all forms of assignment, (sub)contracting of work and fair housing of migrant workers.

No citizen's service numbers (BSN) of the employees and/or other persons involved will be processed for the inspection/ audit and in the reports. Neither will special personal data be processed. Criminal personal data will only be processed during an inspection/audit to the extent that this is prescribed in the Criminal Data Processing Protocol for the SNA Quality Mark. The reports will be retained for a period of 5 years for purposes of statutory (contractual) liability.

#### 5. Rights of data subjects

The data subject whose personal data are being processed has various rights pursuant to the GDPR to ensure a fair and transparent processing of your data. Below we reproduce the rights provided by the GDPR, you and your data subject(s) involved can invoke. You or your data subject(s) can exercise the rights by submitting a 'Request to Exercise GDPR Rights' form. We will inform you of the progress of your request within four weeks of receiving the form.

1. Right to information about the processing: with this document we trust we have informed you sufficiently. However, if you still have questions you can contact us. The contact details can be found at the bottom of this document.
2. Right of access and right to rectification.
3. Right to erasure of data and 'the right to oblivion'.
4. Right to restrict the data processing.
5. Right to object to the data processing.
6. Right to transfer of your data.

In addition, you always have the right to submit a complaint to the [Dutch Data Protection Agency](#) if you suspect that we are using personal data wrongly.

## **6. Technical and organizational measures for the security of the personal data**

We have taken appropriate technical and organizational measures to protect your data, including the following measures:

- All our employees are properly informed about the GDPR and the importance of protecting all (personal) data within our organization and during inspections/audits at our clients. All employees who can take cognizance of your data are bound to keep these data confidential. They have signed a non-disclosure agreement and a code of integrity.
- We have concluded (where necessary) processor agreements with external parties that have access to your information. In all other cases, a non-disclosure agreement has been signed (if necessary). These external parties are:

- o SNA
- o SNF
- o SNCU
- o ABU
- o NBBU
- o RvA
- o Stichting PayChecked
- o Sociale Zaken Pluimvee Verwerkende Industrie
- o Stichting Perspectiefverklaring
- o Website: TeamCreative
- o Dynasec
- o Exact

- Our employees must adhere to a Clean Desk Policy. 'Clean desk' means that at the end of a working day, all papers, notes and personal items must be stored away from the desk. As much as possible, these are recorded in software/computer programs developed for this purpose or stored directly in the cabinets provided. The purpose of our Clean desk policy is to ensure that (personal) data is not left out in the open and not accessible to unauthorized persons. Paper documents provided to the inspector by the client at its office cannot be removed from the client's premises. They must be scanned that same day and stored in the secure software.

Digital data carriers are also subject to these special rules.

- Usernames and passwords are mandatory for all computers, laptops, telephones, and tablets and other data carriers. All passwords must be changed every 3 months. We have internal rules governing data use.
- We have back-ups of the data to be able to restore them in case of physical or technical incidents.
- We regularly test and evaluate our measures.

## **7. Use of cookies on our website**

We place cookies on visitors' computers and devices that are technically necessary for the correct and usable functioning of the website. These cookies control the necessary internet traffic between the Normec VRO B.V. website and the visitor's computer or device, and enable basic functions such as page navigation and access to secure areas. These cookies are stored indefinitely on the computer or device of the visitor and can be deleted by the user. These are 'first party cookies'. From the cookies we cannot determine who has visited our website. Visitors always remain anonymous.

**8. Contact details Normec VRO B.V.**

Attn: Management

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Telephone number: 088 894 4001

Email address: [info-vro@normecgroup.com](mailto:info-vro@normecgroup.com)