

Normec VRO BV Data Processing Policy with Respect to Inspections/Audits

How does Normec VRO BV handle your data?

Normec VRO BV 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 BV 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").

Our Data Protection Policy is applicable to all services provided by Normec VRO BV and the following inspections in particular: SNA Quality Mark (NEN4400-1/NEN4400-2), 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, PVI, "Perspectiefverklaring" statement, Privacy laws (GDPR), Bovib Quality Mark, ISO 9001:2015, and OSB Certification.

Personal data are being processed at various moments during the inspections. This is the case for a request for an offer, the conclusion of an agreement, and the inspection and the obligation to retain records. This data processing policy document specifies, on a step-by-step basis, which personal data we process and for how long we retain these data, the applicable basic principles and grounds, and the security of the data. It concludes by providing you with insight in your rights, the security, and the organisational and technical measures taken by VRO to protect your (personal) information in accordance with the GDPR.

When relevant and possible, VRO works together with parties that are ISO 27001-certified. The internal working procedures of VRO are based as much as possible on these standards.

The effective date and date on which these terms and conditions become valid is 21 June 2018. Any previous versions become invalid at the time of publication of a new version.

Please contact our Security & Privacy Coordinator (Privacy Officer) if you have questions about the Data Processing Policy of Normec VRO BV with respect to the SNA inspections. The coordinator's contact information can be found at the end of this document.

Requesting an Offer via this Website or Otherwise

When you request an offer using the form on our website, we will ask you to provide the following information:

- Company name;
- Name;
- E-mail address and telephone number.

We use this information to contact you about the request for an offer. In general, we will first contact you by phone. When further information needs to be provided, we will use the e-mail address provided for that purpose. We will use this information exclusively for the stated reasons. These data will be removed if a commission for an audit/inspection ultimately fails to materialise.

Concluding an Agreement for Inspections

Once you commission VRO to carry out an inspection/audit, we will request the following personal data (in addition to the information mentioned under 1) for the benefit of this contract.

- Contact person name (if this is someone else) and position;
- Address;
- Signature;
- Name Trust Office advisor (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 contract with you, to prepare the inspection, and to be able to send you an invoice. Your data are processed in a secure environment. We do not use your data for (targeted) marketing purposes. Your data will not be shared with third parties, other than for reasons of fulfilling accounting and other administrative obligations.

The data will be removed if a contract for an audit/inspection ultimately fails to materialise.

We will retain your data for as long as you are our client. This means that we retain your client profile with the information you have provided until you notify us that you no longer wish to make use of our services. We will regard this notification to also be a request to be forgotten (based on your right to be forgotten).

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

The Inspection/Audit and Reporting

During an inspection/audit, the inspector/auditor will (generally) process various personal data at the office of the client. These can be your own personal data or data

about your (former) employees and self-employed persons without employees. The exact personal data concerned and where they originate from differ for each quality mark/service: This is also the case when recording the inspection/audit in the report. You can ascertain which personal data are being processed for each inspection in our register of processing operations. You can also request this register from the Coordinator (see contact details at the end of this document). In this register of processing operations, you can verify for each quality mark/product which personal data are being processed and which recipients in question can take cognisance thereof (such as SNA).

The ground for the processing of personal data for our products/quality marks is Article 6(1)(f) of the GDPR, i.e. processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. The legitimate interest is: the prevention of underpayment of workers, bogus constructions, and labour market fraud (Fair Labour), and more specifically: the prevention of fraud and illegality in the temporary employment sector and in all types of contracting and subcontracting work, such on the basis of the SNA Scheme (NEN4400-1 and the prevailing SNA Standards Handbook) as well as on the basis of the fair housing of labour migrants (SNF Scheme).

The citizen's service numbers of your employees and/or other parties involved will not be processed for the walk-through procedure 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.

Your Rights and Those of Other 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 your 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: we trust that this document provides you with sufficient information. However, please contact the Security & Privacy Coordinator (Privacy Officer) if you have any other questions. The Coordinator's contact details can be found at the end of this Data Processing Policy.
2. Right to access and to rectify the data.
3. Right to erasure of the information and 'the right to be forgotten'.
4. Right to restrict the data processing.
5. Right to object to the data processing.
6. Right to transfer your information.

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

Technical and Organisational Measures for the Protection of the Personal Data

We have taken suitable technical and organisational measures to protect your data. For example, we have taken the following measures:

- All of our employees have been informed about and trained in the GDPR and the importance of the protection of all (personal) data within our organisation and during the inspections/audits at our clients. All VRO employees who can take cognisance 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:
 - SNCU
 - SNA
 - ABU
 - NBBU
 - RvA
 - SNF
 - Stichting PayChecked
 - Sociale Zaken Pluimvee Verwerkende Industrie
 - Stichting Perspectiefverklaring
 - Boom
 - Dynasec
 - Twinfield
 - Basecone
 - Buijs Buijs Accountants
- Our employees must abide by a Clean Desk Policy. 'Clean desk' means that all papers, notes, and personal items in the office must be put away at the end of the working day. They are laid down as much as possible in software/computer programs developed for that purpose or immediately stored in the cabinets provided for that purpose. The purpose of our Clean Desk Policy is to prevent client information from remaining exposed and accessible to unauthorised persons. Paper documents provided to the inspector by the client at its office cannot be removed from the client's premises. In addition, there are special rules for digital data carriers.
- 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.
- Backups are made of the personal data so as to be able to restore them in the event of physical or technical incidents.

- Our measures are tested and evaluated regularly.

The Use of Cookies on Our Website

We place cookies on visitors' computers and devices that are technically necessary for the website to work correctly and usefully. The use of these cookies serves to control the necessary Internet traffic between VRO's website and the visitor's computer or device, and makes possible the basic functions such as page navigation and access to secured sections. These cookies are stored for an indefinite period of time on the visitor's computer or device and it is up to the visitor to remove them. These are 'first-party cookies'. These cookies cannot be used by the VRO to identify the persons that have visited the website. Visitors always remain anonymous.

Contact details of Normec VRO BV

Attn: The management team

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