

# Privacy statement

This statement is effective from may 2018.

## Your privacy is important to us

At JOSKO Smart Flexwork we are aware of the importance of the protection of your personal data, where safety and transparency will be guaranteed. We make every effort to process the personal data in a responsible way, in accordance with the applicable data protection legislation. This applies to all countries in which JOSKO Smart FlexWork is active.

This privacy statement describes JOSKO general privacy policy with regard to the collected, used and exchanged personal information about visitors and users of the website (1), applicants, (potential) candidates, flex workers, internal staff JOSKO (2), employees of suppliers, clients and other business relations, as well as other organizations with whom JOSKO has a business relationship or is considering. The privacy statement clearly indicates how we handle your personal data.

## Who are we

JOSKO exists of the following group companies:

- JOSKO Holding B.V.                      KvK 68754434
- JOSKO Smart FlexWork B.V.        KvK 63180839
- JOSKO Facility B.V.                    KvK 68758030

JOSKO is responsible for the processing of personal data as shown in this privacy statement.

The head office of JOSKO is located in Venlo (The Netherlands) at the following address:

**JOSKO Smart FlexWork B.V.**

**Kaldenkerkerweg 20**

**5913AE Venlo**

**The Netherlands**

**T: +31 77 720 19 71**

**E: [info@joskosmartflexwork.eu](mailto:info@joskosmartflexwork.eu)**

## Who's data do we process?

JOSKO processes your personal data because you use our services / or because you've provided this information to us.

We collect personal data from

1. Visitors and users of the website

In general, our websites - [www.joskosmartflexwork.eu](http://www.joskosmartflexwork.eu), [www.joskosmartflexwork.pl](http://www.joskosmartflexwork.pl), [www.joskosmartflexwork.ro](http://www.joskosmartflexwork.ro) can be visited without your personal data being passed on to us.

As soon as you visit the website of JOSKO, non-identifiable information is collected related to the type of device, browser and how you use our website, such as date and time of access, the source from where you are directly linked to our website, the operating system you use, which part of the website you use and which pages of the website you visit. This information helps us to improve our website for your use and to provide you with the best possible service.

We process the information:

- with your permission (by allowing cookies)
- to be able to carry out the agreement and / or user conditions that we have agreed with you.

To make our websites work optimally, JOSKO uses cookies and web statistics. We do this to see how visitors use our website. A cookie is a file that is stored on your computer. These cookies can be recognized during a follow-up visit to our website.

As soon as you provide us with information, by completing a form, by submitting an application or registration where you create an account, we process the data you provide to us. We ask you to give us only information that is correct and relevant.

We collect personal data from you;

- to be able to respond to questions, tips, feedback, applications or requests if you have filled in a form or left data;
- be able to provide information about our services and other activities and to better attune them to your wishes and qualities;
- to approach you for offers, events and other information that may be of interest to you;
- be able to send you e-mails such as newsletters or vacancy alerts, if you have registered for this (opt-in);
- process or respond to your feedback or complaints in order to improve our services and resources or to be of better service to you.

2. Applicants, (potential) candidates, flex workers, internal staff members JOSKO and / or other persons

We process personal data that is necessary for our service. We collect and process your data for the execution of our HR and recruitment services, including recruitment, temporary employment, recruitment & selection, personal development and employability, reintegration, career counseling, advice, planning and personnel and administration. We cannot execute our services without this information.

The information we collect:

- on the grounds of a legitimate interest that is in accordance with or results from the stated objectives;
- in limited cases: with your permission, wherever possible and you can give this consent in freedom. (If you are younger than 16, we need the permission of your parents or the person who has parental responsibility).
- to communicate (correctly and clearly) with you;
- to make your offers and / or provide information about the services and other activities and to better attune them to your wishes and qualities;
- to approach you for commercial offers, newsletters, events and promotional campaigns that may be of interest to you, only if you have registered for it (opt-in);
- to process your feedback or complaints or respond to them in order to improve our services and resources or to be of better service to you;
- to improve our services; for training purposes, we will inform you in advance;
- to be able to assess your availability for recruitment, permanent or temporary work or an assignment, whereby test results, reference checks, social media can also be used (only if this is really relevant for the job and in the vacancy text is indicated);
- to gain insight into companies where or through whom you may be deployed or how we can support or advise you in the search for work;
- to introduce you to our clients, this can also be done by videos or photos: only if you have provided these to us on a voluntary basis, or have you provided them; you plan as well as possible according to your wishes and availability and the possibilities at our client
- to enter into and maintain an employee relationship with you and to carry out the relevant administration for this purpose;

- to comply with our reintegration obligations and to comply with (the government-imposed) objectives to help people with a distance to the labor market to work;
- to carry out the necessary actions and administration in case we are deductible for sickness insurance.
- to maintain and fulfill an assignment with the client in an agreement
- to process certain function data in the context of a pre-employment screening.
- to promote your personal and career development and employability, including through training, education and testing;
- for management purposes including; management information, providing internal controls and operational safety and performing audits and auditing;
- for quality purposes such as certification;
- to be able to claim subsidies, premium discounts, wage cost benefits etc;
- if we have entered into an employee relationship with you, for compliance with laws and regulations, including but not limited to identification, labor legislation, tax and social security legislation, pension, anti-fraud and national and international sanctions legislation.
- for marketing purposes in case of film or photo recordings; a consent form with personal data pointing to the portrait right and the use of the visual material is part of this.

Additional information may be desirable in order to improve our services to your wishes, qualities and / or availability or to meet more specific questions or obligations with regard to the job and / or from clients. We ask you to give us only information that is correct and relevant.

We may also collect (contact) information from you if you have placed it on public funds or channels (eg LinkedIn), only if we have a legitimate reason to assume that you would be interested in work or our services. In that case we will approach you to test your interest to register with us in accordance with our conditions and with due observance of this privacy statement. You are personally responsible for personal information that is available from you on the internet. Check this regularly and if you do not want information to be available to third parties, please check this out carefully.

More specifically, this concerns - among other things - the following (documents with) personal data:

At registration:

- name and address details, e-mail address and other contact details;
- birth data, age, gender;
- curriculum vitae (CV), information about training, internships and work experience;
- information about training and education and / or testing that you have followed or done yourself or through us;
- data on availability and leave of absence.
- other data that are or may be important in the context of assessing the suitability of you as a candidate, for example references and certificates;
- passport photo and / or video (introduction) - on a voluntary basis.

A copy of the ID certificate may be stored and checked during recruitment and selection in order to check whether you are allowed to work in the Netherlands. If you do not work for JOSKO within four weeks, the ID copy will be removed.

Data about your gender is required to communicate with you, data about age to be able to identify you in our systems and to determine whether we have certain obligations (such as with regard to salary and whether we need permission from parents or guardians) .

The moment you can work / are working / have worked for JOSKO:

- nationality, BSN number, ID certificate, work permit (if needed);
- other data related to staff, salary and absenteeism registration;

If you work for one of our clients:

- data necessary for compliance with laws and regulations (such as name and address, date of birth, BSN, ID certificate and work permit).

In some cases JOSKO also records special personal data if this is necessary to comply with our legal obligations, or if this is otherwise permitted by law. By 'special personal data' is meant; genetic and biometric data, health, criminal-law personal data and / or personal data about unlawful or objectionable behavior, etc. Separate explicit permission will be requested for this commitment.

### 3. Employees of suppliers, clients and other business relations

We process personal data of persons who are working at our client (1) for providing information about the services and other activities, (2) to maintain a business relationship and (3) to conclude and maintain an order agreement.

We process the information;

- to be able to execute the agreement and / or user conditions that we have agreed with you;
- to comply with a legal obligation;
- on the grounds of a legitimate interest that is in accordance with or results from the stated objectives; (why do we process personal data) we do this on the basis of a careful assessment and weighing of interests
- based on your permission.

What personal information do we collect?

- name and contact details;
- position;
- details of the company you work for or that you represent;
- data to maintain a good business relationship with you;
- information for events and meetings.

We collect your data;

- to be able to record, maintain and fulfill the agreement with you;
- be able to communicate with you;
- to maintain a good business relationship with you;
- to be able to make offers, to provide business gifts and / or to provide information about the services and other activities;
- to approach you for commercial offers, newsletters, events and promotional campaigns that may be of interest to you, only if you have registered for this (opt-in).
- to be able to invoice;
- to be able to determine the creditworthiness;
- to give you and / or your colleagues access to the portal and to arrange the account management;
- for reporting purposes (for example, to provide the correct person with the correct reporting);
- process or respond to your feedback or complaints in order to improve our services and resources or to provide you with a better service;
- improve our services.

## How long do we keep your personal data?

We store data of (potential) candidates, job applicants, flex workers, internal staff of JOSKO, employees of suppliers, clients and other business relations to be able to meet the purpose for which it was collected. The required retention period depends on the relevance of the data for maintaining or recording our relationship and we determine on the basis of legislation and regulations and any claim risks. The starting point is that we do not retain the data for longer than necessary.

For potential candidates, applicants (if you not (yet) worked for JOSKO) this means that your recruitment data (CV, work experience, education, test results etc.) are available until two years after the last contact if you did not work for JOSKO.

For flex workers or internal staff members (if you work or have worked for JOSKO) this means that your personal data are available up to two years after the end of employment. Certain personal data are available for JOSKO for a longer period of time for claims, audits and tax obligations.

If you no longer want to be recruited, you can indicate this, if applicable, to your contact at JOSKO or unsubscribe by sending an email to [info@joskosmartflexwork.eu](mailto:info@joskosmartflexwork.eu). Your account will be deleted and you will not be contacted and recruited by JOSKO. If you have registered, your personal data is available for three calendar months in a protected environment (in case of Recruitment & Selection this period is 24 months) in connection with claim risks. In the case of flex workers and internal staff, your personal data will be archived in a protected environment after two years.

In the protected environment, your data is only available to JOSKO under strict conditions in accordance with the goals and deadlines. Your data will be permanently deleted after the above mentioned periods have expired.

If clients have an account in the customer portal, then personal data related to this account is available up to two years after the last placement.

## When do we collect your personal data?

For example, we collect your personal information as;

- you visit our websites;
- enter or leave your details on our website;
- you create an account on the website or via the flex or customer portal;
- you register yourself at one of our branches; or;
- you sign up in a different way or are notified to use our services or to provide you with a service.

If JOSKO has not received data directly from you, we collect the following data;

- from social media, only if we have a justified reason to assume that you would be interested in work. In that case, we will approach you if you are interested in registering with us or using our services in a different way. If you are not interested, we can process relevant data from you to take into account your wish not to be approached by us;
- if we receive personal information from your reference contact persons;
- if customers, where you are offered or where you work or have worked, share personal information about you with us or who you register for our services; if this is part of /or ensues from our agreement;
- from suppliers in the context of hiring and lending temporary workers, in that case we have agreed with the supplier that he informs you and refers to our privacy statement.

## Sharing your data

JOSKO can share your personal data to the following (category of) receivers

- Companies that are part of JOSKO
- Subcontractors and suppliers (such as data processors) who provide services or carry out assignments on behalf of JOSKO. These recipients only have access to the data they need to perform their duties and are bound by contractual obligations;
- Third parties such as service providers who perform functions on our behalf (including testing, training and / or examination institutes, parties that perform customer satisfaction measurements for, among other things, certification marks, certifications, external consultants, business partners and professional advisors such as lawyers, auditors, technical support functions and IT consultants who develop and test our systems);
- Individuals and organizations that have information about, for example, your reference or suitability (such as diplomas) or to whom we provide data, at your request, or who provide us, at your request, with information such as current, former or intended employers, trainers, exam institutes and employment agencies;
- Clients for whom we can introduce you, where you work or are working through us, or who ask us to use our services for your career guidance, coaching or mediation.
- Third parties to whom we provide data, with your explicit consent, or share data at your request in connection with data portability;
- Pension fund, if applicable;
- Government agencies and other agencies (such as grant applicants) if we believe that we are required or entitled to do so.

And in all other cases in which we are obliged to do so, for example through a court order or a court judgment.

The sharing of personal data takes place on the basis of a legitimate interest, consent, legal obligation and / or for the execution of the agreement in accordance with the purposes as stated under "Why do we collect your personal data?"

JOSKO is internationally represented in various EU countries. Your personal data can be transferred or stored within these countries. In which EU countries (outside the Netherlands) is JOSKO located:

### **Polen**

JOSKO Smart FlexWork Sp. z o.o.  
Staszica 60a  
63-700 Krotoszyn - Polska  
T: +31 77 720 19 71  
E: [krotoszyn@joskosmartflexwork.eu](mailto:krotoszyn@joskosmartflexwork.eu)

### **Romania**

JOSKO Smart FlexWork S.R.L.  
Calea Dorobantilor, Nr.6, parter Ap.6  
400117 Cluj-Napoca / Romania  
T: +40 371 493038  
E: [office.cluj@joskosmartflexwork.eu](mailto:office.cluj@joskosmartflexwork.eu)

JOSKO has taken the necessary measurements to ensure that the transferred personal data are adequately protected. Your personal data can be sent to one or more countries where JOSKO is established and / or represented and processed there. We only transfer your personal data to countries outside the EU where the European Commission believes that you have adequate protection there or where JOSKO or its group companies have taken appropriate security measures to guarantee the privacy of your data. For questions about this see contact details below.

## **Your rights**

You have the right to submit a request for;

- access to the personal data that we process about you;
- rectification of your personal data;
- Removing your personal data or limitation of processing: in certain circumstances, unless we have a good reason, such as a legal obligation, to process the personal data or not to delete it;
- limitation or objection to the processing of your personal data;
- transfer of your data.

In the event of your request for the protection of personal data, we must be able to establish your identity.

We do not use automated decision-making based on automated processing including profiling.

For flexworkers and clients with an account in the flex or customer portal;

- If you have your own account, you have access to a large part of your personal data and you, as a candidate, flexworker or client, can download the data for the right to data portability (transferability). You can also change a number of details yourself, such as making adjustments to your CV or your account details;
- If the processing of your personal data is based on your consent, you also have the right to withdraw your consent at any time. However, the withdrawal of your consent does not affect the legality of any processing based on your prior consent before we have received such a withdrawal or in the event that further processing of the same data is continued on a different basis, such as an agreement or legal obligation of JOSKO.

Below the way in which you can withdraw your permission;

- if you have registered to receive information about news items, events, alerts or other messages, you can unsubscribe from this via the unsubscribe option in the e-mail you received;
- you can prevent cookies from being placed via your browser settings, but you can also change or remove your cookie settings from your device at any time via the browser settings;

- If you want to change or delete data that you cannot change yourself, you can contact your contact person or contact JOSKO or via [info@joskosmartflexwork.eu](mailto:info@joskosmartflexwork.eu).

## Questions, comments, complaints or (suspected) data leak

If you have any questions, please contact your contact person or the JOSKO location. You can also contact us via the general contact details. General contact details of JOSKO in The Netherlands:

**JOSKO Smart FlexWork B.V. (Head Office)**  
**Kaldenkerkerweg 20**  
**5913AE Venlo**  
**The Netherlands**

**T: +31 77 720 19 71**

**E: [info@joskosmartflexwork.eu](mailto:info@joskosmartflexwork.eu)**

If you have any complaints, please let us know so that we can help you further and, if necessary, adjust or improve our services/work processes.

If you have any questions, comments or complaints about the protection of your personal data by JOSKO, please contact our data protection officer. This can be done in via [info@joskosmartflexwork.eu](mailto:info@joskosmartflexwork.eu) or via the general telephone number +31 77 720 19 71. You also have the right to submit a complaint about the processing of your personal data to the Dutch Data Protection Authority.

Is there a suspicion of a data breach? For example, if you suspect loss or unauthorized access to personal data, let us know immediately via [info@joskosmartflexwork.eu](mailto:info@joskosmartflexwork.eu).

## Protection of your personal information

JOSKO makes every effort to optimally protect your personal data. We do that based on our information security policy. To this end, we have taken physical, administrative, organizational and technical measures to prevent unauthorized use, taking into account the latest state of technology. These measures are regularly evaluated and, where necessary, updated.

If data is provided to data processors who provide services or execute orders on behalf of JOSKO, JOSKO has agreed with them that they will also optimally protect personal data.

You must be aware that you are responsible for the security of your computer equipment and / or telephone and your own internet connection, and that it is never 100% secure. Sending personal data via the internet is therefore at your own risk.

## Changes in privacy statement

JOSKO may from time to time make changes, additions or changes to its privacy statement for a variety of reasons. The most up-to-date privacy statement can be viewed on the website at all times. We recommend that you regularly read the privacy statement.

Version: March 2019

This statement complies with the General Regulation on Data Processing, which has been in force since 25 May 2018.