

# PRIVACY POLICY STATEMENT FOR JOB APPLICANTS

Last updated 09.07.2018

Sanoma holds your privacy as a job applicant in high regard.

This Privacy Policy Statement informs you why Sanoma collects, uses and shares your personal data in connection with your job application and the recruitment process within Sanoma.

## 1. DATA CONTROLLER AND CONTACT INFORMATION

The data controller in accordance with the applicable data protection law is Sanoma Media Netherlands B.V. which is a part of the Sanoma group of companies (the data controller is hereinafter referred to as "Sanoma", "we", "us" or "our"). Sanoma is responsible for ensuring that your personal data is processed in compliance with this Privacy Policy Statement and applicable data protection laws.

If you have questions regarding this Privacy Policy Statement, please contact [hr.nl@sanoma.com](mailto:hr.nl@sanoma.com).

The contact details of the data controller:

Sanoma Media Netherlands B.V.  
KvK nummer: 33133064  
Capellalaan 65, Hoofddorp

## 2. COLLECTION OF PERSONAL DATA

Primarily we collect personal data directly from you. We may also collect personal data from other sources, such as recruiting consultants and public authorities. If we collect personal data from other sources than yourself, we will only do so within the limits of applicable laws and will ask for your consent for collecting information from elsewhere if this is required by applicable laws.

We collect personal data concerning applicants that is necessary to manage the job application and the recruitment process, such as

- **basic personal data**, e.g. name, home address, email address, and phone number;
- **information contained in your job application**, e.g. information about your education, previous work experience, qualifications, language skills, and references;
- **information collected and processed during the recruitment process**, e.g. information about the progress of the recruitment process, notes concerning your application and possible interviews, information concerning possible aptitude tests;
- **information required to be entered into a job contract.**

### **3. PURPOSE AND LEGAL BASIS FOR PROCESSING PERSONAL DATA**

We process personal data of applicants to

- Assess the suitability of the candidates for the open position and manage the recruitment process, such as to inform applicants about the progress of recruitment and to arrange interviews.
  - The legal basis for processing personal data is the employment contract, in order to take steps prior to entering into a possible employment contract at your request by submitting your job application to us.
- Consider you for other potential positions within Sanoma, if you have given your consent for storing your application / cv for such re-use of the job application data. In such a case the legal basis for processing your data is consent.

### **4. TRANSFERS AND DISCLOSURES OF PERSONAL DATA**

We may disclose your personal data within the Sanoma group. Your personal data may also be processed by another Sanoma group entity on behalf of us. We base this processing on our legitimate interest to transmit personal data within the Sanoma group for internal administrative purposes, such as for the purposes of using centralized recruitment systems.

We may disclose personal data to third parties:

- when permitted or required by law;
- when our trusted service providers provide services to us on our behalf and under our instructions (e.g. outsourced recruitment and aptitude tests). We will control those providers and be responsible for the use of your personal data at all times;
- if we are involved in a merger, acquisition, or sale of all or a portion of our assets; and
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

### **5. TRANSFERS OF PERSONAL DATA OUTSIDE THE EU/EEA**

We aim to primarily process your personal data in the EU. However for some processing purposes we may transfer your personal data outside the EU or the European Economic Area (EEA). In such cases we ensure that legal requirements regarding the Processing of Personal Data outside the EU/EEA countries are complied with. In practice this means e.g. that the contracts we have with suppliers we work with use the appropriate EU Model Clauses.

### **6. RETENTION OF PERSONAL DATA**

Your personal data will be retained only for as long as necessary to fulfill the purposes defined in this Privacy Policy Statement. This means that most of your personal data will be retained for the duration of the recruitment process, and in practice your personal data will be deleted within four weeks after the position has been filled. In some cases we may retain your personal data for up to a year after the position has been filled.

If we would like to use your personal data for other possible recruitment processes, we will ask for your consent to do so. In these cases we retain your personal data for a year from the date you gave your consent for this.

Once your personal data is no longer required by law or rights or obligations by either party, we will delete your personal data.

## **7. YOUR RIGHTS**

You have a right to access the personal data we process about you. You may access, correct, update, change or remove your personal data at any time. However, please note that certain information is strictly necessary in order to fulfil the purposes defined in this Policy and may also be required by law. For example, if you wish to have your personal data deleted while the recruitment process is still ongoing, we will not be able to continue the process with you.

You have a right to object to certain processing. To the extent required by applicable data protection law, you have a right to restrict data processing.

You have a right to data portability, i.e. right to receive your personal data in a structured, commonly used machine-readable format, and transmit your personal data to another data controller, to the extent required by applicable law.

If you have given your consent to keep your personal data for other recruitment processes for a year, you may withdraw this consent at any time.

Please send above-mentioned requests to us at [hr.nl@sanoma.com](mailto:hr.nl@sanoma.com).

If you think there is a problem with the way we are handling your personal data, you have a right to file in a complaint to your national data protection authority.

In the Netherlands the contact details of the data protection authority can be found here: <https://autoriteitpersoonsgegevens.nl>

## **8. SECURITY**

We maintain reasonable security measures (including physical, electronic, and administrative) to protect personal data from loss, destruction, misuse, and unauthorized access or disclosure. For example, we limit access to personal data to authorized employees and contractors who need to know the information in the course of their work tasks.

Please be aware that, although we endeavour to provide reasonable security measures for personal data, no security system can prevent all potential security breaches.

## **9. CHANGES TO THIS POLICY**

We may change this Privacy Policy Statement from time to time. If we make any substantial changes to this policy, we will inform you about this by email. The latest version of this Privacy Policy Statement is always available at [www.sanoma.nl](http://www.sanoma.nl).