

Privacy Policy

Who we are

As well as advising on and implementing processes, training courses, and coaching professionals, we at Perfact Group also optimize production companies by focusing on technology, organization, and processes. We select and recruit highly-trained technical specialists to fill your temporary or permanent posts. We provide a high-quality solution to every requirement.

This Privacy Policy covers all data processing operations – which could identify you as an individual - at our offices:

Our head office in the Netherlands:

RB group B.V. (Chamber of Commerce number 14081560), trading as Perfact Group, with its registered offices and principal place of business at: Abshoven 33, 6151 GC Munstergeleen (the Netherlands).

Our office in Belgium:

Perfact Belgium BvBa., with its registered offices and principal place of business at Viaduct Dam 132, 2060 Antwerp (Belgium).

Our office in Germany:

Perfact Deutschland GmbH, with its registered offices and principal place of business at Friedrich-Bergius-Str. 10, 41516 Grevenbroich (Germany).

You can reach us by using the contact information under the heading: 'How to contact us' at the end of this Privacy Policy.

Your privacy

Your privacy is important to us. For that reason, we ask you to read this Privacy Policy carefully.

We have set out to write this policy in plain and understandable language in order to explain to you: *who we are, what personal data we can process, in which cases we can process your data (purposes and bases) and what your rights are regarding the processing of your personal data.*

Please note that personal data may contain any information, details, or features that could directly or indirectly identify people.

We have the following website: <https://www.perfact-group.com>. This website and all of our services are subject to privacy legislation (GDPR). We treat your personal data with respect from the moment it comes into our possession.

Our day-to-day operations involve handling personal data. We therefore have a duty to ensure that your privacy rights are not violated. In this Privacy Policy, we explain what information we collect when you use our services, why we collect it, and how we improve your user experience and our services so that you know exactly how we work.

This Privacy Policy applies to all of our services. By using our services and our website, you confirm that you have taken note of and accept this Privacy Policy.

Submitting a complaint

We will of course also be pleased to help you if you have any complaints about the processing of your personal data. Under privacy legislation you have the right, as the provider of your personal data, to lodge a complaint with the Dutch Data Protection Authority. You can do this at the DPA website:

<https://www.autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>

In the event of an actual or suspected data breach, for example, or if you suspect that your personal data has been lost or unlawfully accessed, please let us know by directly contacting our Data Protection Officer (DPO) Mr E. de Jager. You can contact our Data Protection Officer using the following e-mail address: edwindejager@perfact-group.com.

What data can we process?

We may process the following categories of personal data through your visit to our website, e-mail or letters that you send to us, or data that you physically provide at one of our offices, or when you otherwise register or are registered to use our services:

- Personal details such as forename, initials, surname, address, place of residence, e-mail address, telephone number
- Date of birth, sex, marital status, country of birth, and nationality (and native language or second language)
- Order dates (specification, characteristics, and price of purchased services)
- Company name and details (if they constitute personal data)
- VAT number
- Information about availability and leave periods
- Passport photo and video (introduction) – on a voluntary basis.
- Job title, type of employment, date of commencement of employment, and date of termination of employment
- Company information and contact details of employers (in their capacity as clients) at one of our locations
- Information about former employers
- Information that constitutes reference data of former employers or colleagues of employers
- Name, address, place of residence, and telephone number of coaches
- All data that may be collected and added to the personnel file, such as performance appraisal reports, evaluations of courses/workshops in the context of a training programme, and personal development plan, under the supervision of a coach, and as part of the employment contract
- URL LinkedIn page and URL of Facebook page
- Interaction data (obtained for example via social media, WhatsApp, or other means)
- Financial information for invoices.
- Proof of identity, which may be stored and checked during the recruitment and selection process to determine whether you are allowed to work in the Netherlands. If you do not start working for us within four weeks, your proof of identity will not be kept on file.

As soon as you start working for Perfect Group we collect and process the following information:

- Nationality, Citizen Service Number (BSN), ID document, work permit
- Other information related to personnel, payroll, and absenteeism records
- Payroll number
- Financial data for the payment of wages and the employer's contribution to taxes and social insurance/national insurance

If you are placed with a client through our mediation, we collect the following data:

- All information required in connection with the limitation of recipient's liability (such as name and address, date of birth, Citizen Service Number (BSN), type of ID document, number and period of validity and, if applicable: residence permit, A1 certificate, work permit).

Regarding our website, we automatically collect the following data after your visit to our website:

- E-mail address, access password, and the use of our Intranet
- IP address, and
- Cookies

All data is stored on the secure servers of a third party: Emango ICT Solutions BV in Schinnen, the Netherlands.

Special and sensitive personal data

We ask you to provide information such whether you are male or female to communicate with you, information about your age to identify you in our systems and to ascertain whether we have any obligations (such pay aspects and whether we need the consent of a parent or guardian).

Perfect Group only records special personal data if necessary to comply with its legal obligations, or if this is otherwise permitted by or pursuant to the law. This other special personal data includes information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic and biometric data, health, sex life, trade union membership, criminal records, and personal data about unlawful or disruptive behaviour.

Cookies and similar technologies

Perfect Group uses functional, analytical, and tracking cookies. For more information about the specific cookies we use, please [click here](#) to see our full list of cookies.

In this Privacy Policy, we provide a general explanation of the cookies we collect.

Cookies, general

We use our website to collect data for analysis purposes to gain a better understanding of our customers, so that we can tailor our services to them. Our website makes use of cookies (text files that are placed on your computer) to help the website to analyse how users make use of our website.

Information is stored or read by means of cookies or similar technologies (referred to below as 'cookies' for the sake of convenience). They are used to:

- enable website functionalities and to protect the website (*technical or functional cookies*)
- analyse the use of the website and, on that basis, improve it (*analytical cookies*)
- prevent you from seeing a particular ad too often (and record the number of times an ad appears). This cookie is not linked to any profile of you.

We use tracking cookies to track which pages you visit in order to compile a profile of your online behaviour. This profile is not linked to your name, address, e-mail address, etc., but is used only to match advertisements to your profile to ensure that they are as relevant to you as possible.

Technical or functional cookies

Some cookies ensure that certain parts of the website work properly and that your user preferences are remembered. For example, cookies may be used to render fonts properly, to remember your user session on the web server so that you can view the website, or to remember a search term that is searched within the website or a selected filter. The technical and functional cookies we use are for storing user data and information after a first visit to the website.

Analytical cookies

We use Google Analytics cookies to enable Google to inform us about the use of our website, provide us with reports on how it is used, and give us information about the effectiveness of our campaigns. The information thus obtained, including the address of your computer (IP address), is passed on to Google and stored by Google on servers in the United States. We have concluded a processor agreement with Google in which agreements are laid down on the collected data is handled. We have not given Google permission to use the information obtained for other Google services. Google may however pass on this information to third parties if it is legally obliged to do so or if these third parties process the data on Google's behalf. We have no control over this. More information about data processing by Google Analytics can be found in [Google's Privacy Policy](#) and in the [Privacy Policy of Google Analytics](#).

You can collectively disable Google Analytics cookies via this link: <https://tools.google.com/dlpage/gaoptout>

Tracking cookies

We use what are known as tracking cookies. For this purpose, we use Google Adwords. This is used to select and display ads that are relevant to you. The selection is based on the websites you have previously selected and viewed. The selection is not

linked to your personal data. However, you must give your explicit consent for this.

Enabling and disabling cookies

You can set your browser to accept the storage of cookies only with your consent. Please note that many websites do not work optimally when cookies are disabled.

Deletion of cookies

Many cookies have an expiry date. If an expiry date has been set, the cookie is automatically deleted when that date is reached. You can also choose to manually delete cookies before the expiry date. Please refer to your browser manual for more information.

Third party websites

This privacy and cookie policy does not apply to websites of third parties that are linked to our website. We cannot guarantee that these third parties will handle your personal data in a reliable or secure manner. We recommend that you read the Privacy Policies of these websites before using them.

When can we process your data?

We process your data:

- when you visit our website
- if you have indicated that you want to use one of our services
- when we deliver our services and when we invoice our services
- when you communicate with our organization by telephone or in writing (including by e-mail) and explicitly indicate that you want a response to the contact
- when you take up employment or enter into a partnership with our organization
- when you provide us with data directly as the data subject
- when you provide information about others directly to us
- when we receive personal data from authorized third parties.

Personal data that you provide directly to us as a data subject:

Examples include:

- personal data that you provide by visiting our website, by e-mail, or by letter, e.g. when applying for a certain vacancy or because you are purchasing a service from us

- creating an account on our Intranet
- registering or entering into an agreement with us at one of our offices
- personal data that you provide when you talk to us as a potential employer for jobseekers or as a jobseeker yourself
- personal data that you provide in the context of (among other things) correspondence, feedback, dispute resolution, satisfaction studies, etc.

Personal data about others that you provide directly to us

It is possible that you share the personal data of others with us, such as addresses or contact details. Please note that it is your own responsibility to check whether these people have agreed to the disclosure of their personal data.

Personal data that we receive from third parties

We may receive personal data through third parties. Examples of such third parties include authorities with legal powers (UWV Employee Insurance Agency, the Tax and Customs Administration, police, or judicial authorities) and:

- social media data, only if we have a legitimate reason in assuming that you would be interested in work. In that case, we will contact you to find out if you are interested in registering with us or would like to use our services in some other way. If you are not interested, we may process relevant data about you in order to meet your wish not to be approached by us
- if we receive personal information from reference contact persons specified by you
- if customers you have been referred to or have worked for share personal data about you with us or sign up for our services; if this forms part of or follows from our agreement
- If we receive data from suppliers within the context of employee placement and mobility; in that case, we have agreed with the supplier that they will inform you and refer you to our Privacy Policy.

Bases for data processing

The law contains a list of bases that justify the processing of your personal data. We invoke three of these bases: A brief explanation of each basis is given below.

- **Performance of the contract.** We use your personal data for the purpose of fulfilling the agreement we have entered into with you, with our client or with your employer.
- **Legitimate interest.** This legitimate interest serves the commercial interests of our organizations. The processing of your personal data is necessary to reasonably protect our own business interests. This may include, for example, informing clients about new services and activities, or defending interests in legal proceedings.
- **Consent.** With your consent, we may use your personal data for certain marketing activities. You can of course also withdraw your consent. This Privacy Policy, under the heading 'Your rights' and then under the heading 'Withdrawal of consent', outlines how you can withdraw your consent at any time.

Purposes

We process personal data for one or more of the following purposes:

- For entering into, performing or terminating various agreements concerning the business operations of one of our branches
- To maintain a business relationship
- To make offers to you or to provide information about the services and other activities and to match these better to your wishes and qualities; this is done partly by our employees and partly automatically (e.g. a vacancy alert)
- To contact you for commercial offers, to send you newsletters and information about events and promotional offers that may be of interest to you, but only if you have subscribed for them (opt-in)
- To assess your suitability and availability in connection with mediation for permanent or temporary work or an assignment, in which use can also be made of test results, reference checks, social media (only if this is actually relevant to the job and has been indicated in the vacancy text)
- To introduce yourself to our clients; this can also be done by means of audio and/or visual material in the form of videos or photos, but only if you have provided them to us voluntarily, or have arranged for them to be provided to us; to plan for you as well as possible according to your wishes and availability and options with our client
- To maintain personnel files, where this has a legal basis, or a written agreement has been entered into, and only the data strictly necessary for the proper performance of the agreement and which has been collected to meet legal obligations as an employee or employer
- To provide you and your colleagues with access to our Intranet and to set up account management
- To comply with our reintegration obligations and to meet the goals imposed by the government to help people with a greater distance to the labour market to find work
- To take the necessary actions and conduct the administration in cases where we are the risk-bearer
- To register an order for the purchase of one of our services from the client in an agreement with the client and to maintain and fulfil the agreement with the client
- To promote your personal development and employability, such as through training, education and testing
- To guiding your career and help you with outplacement
- For management purposes including management information, the provision of internal controls and company security and the performance of audits. Anonymized data is used as much as possible to inform management and to conduct internal and external audits, and personal data is only used if this is strictly necessary for the purpose (e.g. to settle a complaint).
- Quality objectives such as certification
- The ability to claim grants, premium discounts, wage cost benefits, etc.
- If we have an employee or personnel/mediation relationship with you, for compliance purposes, including, but not limited to, identification, employment, tax and social security, pension, anti-fraud measures, and national and international sanctions.
- To inform you about the care and aftercare associated with the services you have purchased.
- To communicate with you and answer your questions or deal with your complaints via e-mail, post, or telephone messaging
- Personal data of employees and others with whom a partnership has been entered into is archived to meet the statutory retention obligations and for the provision of personal data on the basis of a statutory power
- Personal data or its properties may be processed for statistical purposes, as well as to analyse and improve the quality of service, processes and systems.

We do **not** use profiling or other forms of automated decision-making.

We only process your personal data regarding our website for the following purposes:

- Providing vacancy details at your request
- Finding potential employers or clients at your request and distributing your CV among potential employers or clients
- Granting access to our website
- Using the functionalities on our website
- Gaining an insight into how our website is used
- Improving and evaluating our website
- Making it possible for you to e-mail a page, print it or share it via social networks such as Facebook, Twitter, and LinkedIn.

We do not collect or use information for purposes other than those described above unless we have obtained your prior consent or are permitted to do so by law.

Retention periods

We do not store your personal data for longer than is strictly necessary and to serve a specific purpose, nor do we retain your personal data for longer than permitted by law under any circumstances.

When a retention period expires, your personal data and, in all cases, all identifying properties, are erased.

In our retention period policy, we have determined the maximum retention period for each type of personal data and we strive to implement this policy consistently. In the event of a statutory obligation to retain and a related period of retention that exceeds the maximum retention period we have formulated, the statutory retention periods are given precedence.

The most relevant retention periods are briefly explained below.

- When you communicate with our organization by telephone or in writing and explicitly indicate that you want a response to the contact. You indicate that you wish to be called back or e-mailed. Once a request has been processed, personal data is kept for a period of one year so that business interests can continue to be protected within that period and any liabilities can be countered.
- In principle, we do not store personal data from employment contracts for longer than two years after the employment contract with the employee in question has been terminated.
This is different if the personal data is important to the tax authorities* or if at the end of this period there is an ongoing dispute/legal action/claim/outstanding limitation periods of claims arising from an agreement. The relevant data will then be kept for a longer period until the time of settlement or the end of the dispute/legal action/claim/outstanding limitation period.
- We will generally retain personal data that we collect from self-employed persons in the context of an agreement for services for no longer than two years after the agreement for services with the self-employed person has been terminated. This is different if the personal data is important to the tax authorities* or if at the end of this period there is an ongoing dispute/legal action/claim/outstanding limitation periods of claims arising from contracts. The relevant data is then kept for a longer period until the time of settlement or the end of the dispute/legal action/claim/outstanding limitation period.
- We keep personal data in invoices, payslips, employment contracts, and other documents from our records that are important to the tax authorities for at least seven years from the first financial year after the end of the financial year in which the invoice is paid.

- If you no longer wish to be mediated, you can indicate this in your account on the Intranet or with your contact person. In that case you will no longer be approached and mediated by us. After two years, your personal data will be archived in a protected environment. Your personal data will in that case only be available to us under strict conditions in accordance with the applicable purposes and time periods.

Changes to the Privacy Policy

This Privacy Policy is tailored to the use and functionalities of our website and our services in our bricks and mortar offices. Changes to our website may lead to amendments being made to this cookie Privacy Policy. It is therefore advisable to regularly review this Privacy Policy on our website. If we materially change the Privacy Policy, we will notify you by using the e-mail address you provided..

Sharing data with third parties

We may disclose your personal information to third parties in accordance with this Privacy Policy and the law. Perfact Group may pass on your personal data to the following categories of recipients

- All our locations that are members of the Perfact Group
- Subcontractors and suppliers or clients that provide services or carry out orders on behalf of Perfact Group and also process your data (the processors). These processors only have access to the data they require to perform their tasks and are bound by contractual obligations. We enter into an agreement with these processors so that your data is handled with care and to ensure that your data is subject to the same level of security and confidentiality
- Third parties such as service providers who perform tasks on our behalf (such as testing, training and examination institutes, parties that measure customer satisfaction for purposes such as quality marks and certifications, external consultants, etc.)
- In some cases, the information can be shared internally. Our employees are obliged to respect the confidentiality of your data and sign a confidentiality agreement for this purpose
- Third parties we provide data to with your explicit consent or at your request share data in connection with the transfer of your data
- Your pension fund, if applicable
- Government agencies and other bodies (such as grant applicants) if we believe that we are obliged or entitled to do so.
- To the extent strictly necessary, to the UWV Employee Insurance Board. We only do this on the basis of an obligation arising from the Eligibility for Permanent Invalidation Benefit (Restrictions) Act and/or other statutory provisions.
- Your personal data will not be shared outside the European Union without your express consent.

Your rights

Everyone has a number of rights under the GDPR. We do our utmost to comply with this as closely as possible. Do you have any tips or remarks? Please let us know! To exercise your rights, please contact Perfact Group at info@perfact-group.com.

We have set out your rights below.

- **The right to access, rectify, or erase your data.** We respect your right to access, rectify, or erase your personal data. You can send a request to access, rectify, or erase your data or withdraw permission to use your personal data to info@perfect-group.com. We will respond to your request as soon as possible, but in all cases within one calendar month. If we fail to meet this one calendar month deadline, we will notify you within the same month of the reason for the delay. We may extend our response time by two calendar months provided that we can justify this by the complexity of your request or the number of requests you have made.
We will only turn down a request to access, rectify, or erase your data in exceptional circumstances: if the request is manifestly unfounded or disproportionate. A request is manifestly unfounded if the preconditions for a request have not been met, or if you request information that falls outside the scope of the GDPR. Examples include a request to access someone else's personal data. A request is excessive if a very disproportionate burden is placed on us, for example if you make weekly requests for your files. The burden of proof to show that the request is manifestly unfounded or disproportionate rests with us.
- **Right to rectification.** You can send a request for rectification to info@perfect-group.com
- **Right to be forgotten.** You can erase the personal data that we have about you. It is possible that we still have to process this data for other purposes (administration or deduplication, for example).
- **Right of limitation (i.e. freezing of data).** To exercise your right of limitation (this means that the processing of your personal data will be temporarily frozen until an objection or dispute has been resolved), you can also address your request to info@perfect-group.com. We will only process your personal data during the limitation period with your consent for the institution, exercise, or substantiation of (for example) a legal claim or for the protection of the rights of others or for important reasons of public interest for the European Union or for a Member State.
- **Right to data portability.** This right entitles you to obtain the personal data you have provided to us, in order to transfer it to another controller (other than Perfect Group).
This right applies if you give your consent or if necessary for the performance of an agreement. If you have your own account on our Intranet, you will have access to a large proportion of your personal data and will be able as a candidate, flex worker, or self-employed person to download the information on the right to data portability. You can also rectify a number of details yourself, such as updating your CV, if applicable.
- **Right to object (opposition).** To exercise your right to object, you can also contact us by e-mail: info@perfect-group.com. You can invoke your right to object in three cases:
 - First of all, you can object to the processing of personal data in connection with your personal circumstances. However, the processing must be based on the protection of a legitimate interest or a third party to which the data is disclosed. We will stop processing the data unless there are compelling, justifiable grounds for our interest in processing that outweigh your interest in having the processing stopped.
 - Secondly, you can object to the processing of your personal data for direct marketing purposes.
 - Thirdly, you can object to the processing of your data for scientific or historical research purposes or for statistical purposes on grounds specifically related to your situation.
- **Withdrawal of consent.** 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 lawfulness of any processing operation based on your prior consent before we have received that withdrawal or, in the event of further processing of the same data, have been continued on another basis, such as an agreement or legal obligation on the part of Perfect Group.

If you have signed up to receive information for news, events, alerts, or other communications, you may opt out by using the unsubscribe option in the e-mail you receive about this.

If you want to change or delete data that you are unable to modify yourself, you can contact your contact person and/or our branch where you concluded the contract with us.

Security

We have put security measures in place to counteract the abuse of and unauthorized access to personal data to the best of our ability. We thus ensure that the only people with access to your data are those allowed to do process it under an agreement or at your request. Access to this data must therefore be protected. Another measure we take to prevent violations of your privacy rights is to have our employees sign a non-disclosure agreement.

Our security measures are also regularly checked by means of periodic tests to identify the privacy risks. We also use SSL certificates for the secure transfer of your data and communication and e-mails containing sensitive personal data are encrypted.

If you feel that your data is not properly secured or if there are signs of misuse, or if you require more information about our security or your personal data, please contact us via info@perfect-group.com or by using the contact information below.

How to contact us:

Head office:

Name of company: RB group B.V., trading as Perfect Group
Address: 6151 GC Munstergeleen (the Netherlands), Abshoven 33
Contact person/Data Protection Officer: Mr E. de Jager
Website: <https://www.perfect-group.com>
E-mail: info@perfect-group.com
Telephone number: : +31 (0)46 423 07 07
Chamber of Commerce number: 14081560

Belgian office:

Name of company: Perfect Belgium BvBa.
Address: 2060 Antwerp (Belgium), at Viaduct Dam 132
Contact person/Data Protection Officer: Mr E. de Jager
Website: <https://www.perfect-group.com>
E-mail: info@perfect-group.com
Telephone number: +31 (0)46 423 07 07

German office:

Name of company: Perfact Deutschland GmbH

Address: 41516 Grevenbroich (Germany), at Friedrich-Bergius-Str. 10.

Contact person/Data Protection Officer: Mr E. de Jager

Website: <https://www.perfact-group.com>

E-mail: info@perfect-group.com

Telephone number: +31 (0) 46 423 07 07

Effective date

This renewed Privacy Policy entered into force on 15 June 2018.