

# PRIVACY POLICY APPLICANTS AND STAFF MEMBERS

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## **Valk Exclusief Privacy Policy**

If you apply for a job at a Valk Exclusive hotel or restaurant (“Valk Exclusive”) or work at Valk Exclusive, Valk Exclusive will process your personal data. In this Privacy Policy (the "Privacy Policy") we explain which personal data of applicants and employees are processed, for what purpose and how you can exercise your privacy rights. You will also find other relevant information as part of personal data.

Your privacy matters to Valk Exclusief. That is why we take great care in processing your personal data, while complying with applicable laws and regulations.

## **1. Implementation Privacy Policy**

The Privacy Policy applies to all activities and dealings of Valk Exclusief with regard to applicants and staff members. **Appendix 1** to this Privacy Policy contains a list of the hotels and restaurants that are subject to this Privacy Policy.

Valk Exclusief informs applicants and staff members about the processing of personal data through employment websites, web pages and various (digital) employee platforms. In addition, this privacy statement is provided when entering into an employment contract. By applying for a job with or joining Valk Exclusief, you confirm that you agree with the method of processing personal data as described in the privacy statement.

## **2. What is the purpose and basis of the processing?**

Valk Exclusief processes various types of personal data for different purposes. Below we explain which personal data are processed for which purposes.

### **a. Recruitment and selection of candidates**

Valk Exclusief processes personal data as part of an effective and efficient recruitment and selection process for new staff members. Processing takes place with your permission by sending your resume and motivation letter, and also because we have a legitimate interest in this (*recruitment and selection of staff*).

### **b. Personnel administration**

Being an employer, Valk Exclusief carries out personnel administration for the registration and updating of personnel data. This is done as part of our personnel management. It involves data that are necessary for the performance of the employment contract and that must be recorded on the basis of a legal commitment

### **c. Salary records and hour administration**

Valk Exclusief keeps the accounts with regard to the payment of wages. It involves processing that is necessary for the performance of the employment contract and to which Valk Exclusief is legally bound.

### **d. Absence recording and policy**

Valk Exclusief records the absence of its staff members as part of its salary records, and also as preventive measure with regard to absence and in order to support reintegration, prevent absence and promote reintegration.

These processing operations are necessary to meet legal obligations and are necessary for the performance of the employment contract. Valk Exclusief also has a legitimate interest (*prevention and promotion of reintegration*) in this processing type.

**e. Training and assessment of staff members**

Valk Exclusief collects data to assess your performance as a staff member and to offer training opportunities. Valk Exclusief has a legitimate interest in the processing of this data (*good business operations and good employment practices*) and needs this data to implement its training obligations.

**f. Security at the hotel**

Our hotels, restaurants, car parks and garages are equipped with camera security to improve the safety of our guests, employees and possessions and to prevent theft and other irregularities. We have a legitimate interest (*security*) to process this data.

**g. Marketing of the hotel**

Valk Exclusief sometimes uses images and information about / from staff members in order to promote the hotel through social media, magazines and promotional material. This may include, for example, photos or interviews with staff members. The data will only be processed if you have given us your explicit consent for this.

**h. Sharing news and relevant personnel information**

Valk Exclusief distributes newsletters and relevant personnel information to staff members through e-mail. We collect your e-mail address to share these newsletters and information with you, with your permission.

### **3. Which personal details about applicants does Valk Exclusief process?**

Valk Exclusief will process the following categories of personal data:

- a. identification and contact details, such as title name, address, place of residence, date of birth, e-mail address, telephone number and possible employment documents;
- b. training and job application details, including CV, motivational letter, training, courses, assessments, references;
- c. interaction data, including IP address, web surfing behaviour on the Valk Exclusief websites, click behaviour, cookie ID and contact with Valk Exclusief; and
- d. other data you have provided to us, voluntarily and additionally, such as a photo, information regarding your interests, hobbies, etc.

*Source*

Valk Exclusief receives the above-mentioned data:

- directly from you;
- through employment websites that include Valk Exclusief job openings;
- through Facebook, WhatsApp or Instagram if you use one of these media for your application;
- or
- through a friend who recommended you to us.

#### **4. Which personal details about staff members does Valk Exclusief process?**

Valk Exclusief will process the following categories of personal data:

- a. identification and contact details, such as title, name, address, place of residence, date of birth, e-mail address, marital status, telephone number and possible employment documents;
- b. training and job application details, including CV, motivational letter, training, courses, assessments, references;
- c. IBAN number;
- d. identity card and social security number;
- e. clothing and shoe size;
- f. salary data, payroll tax form, hour registration, short-term and long-term leave, absence and other data relevant to salary administration;
- g. data regarding your performance;
- h. interaction data, including IP address, web surfing behaviour on the websites of Valk Exclusief, click behaviour, cookie ID and contact with Valk Exclusief; and
- i. other data that you have provided to us voluntarily and additionally, such as photos, information about your interests, hobbies, etc.

#### *Source*

Valk Exclusief receives the above-mentioned data:

- directly from you;
- the relevant Occupational Health and Safety Service and/or company doctor;
- training companies and educational institutions;
- through employment sites that include Valk Exclusief job openings;
- through Facebook, WhatsApp or Instagram, if you use one of these media for your application; or
- through a friend who recommended you to us.

#### **5. With whom does Valk Exclusief share personal data?**

Valk Exclusief only provides personal data to other parties in order to facilitate and enable the processing, mentioned under point 2. Below you will find an overview of (the categories of) recipients.

- a. the location that offers the job, to which you apply
- b. (IT) service providers and software companies;
- c. enforcement authorities, including the police, judicial authorities or anti-fraud organisations;
- d. the Occupational Health and Safety Service;
- e. the UWV (Dutch Employment Insurance Agency)
- f. the Valk Exclusief salary administrators and auditors.

Additionally, Valk Exclusief can share personal information in order to:

- comply with the statutory laws and regulations;
- respond to government requests or court orders;
- comply with statutory procedures;
- safeguard the rights, privacy, safety or property of Valk Exclusief, guests or staff members;
- respond to an emergency.

We ensure that data sharing only takes place if the third party processes the data according to our instructions, takes adequate appropriate (security) measures and guarantees us to adhere to the statutory privacy laws and regulations.

## 6. Personal data transfer outside the EEA

Valk Exclusief can transfer personal data from the Netherlands to abroad. When personal data are processed by us outside the EEA, we will ensure an appropriate level of protection of the transferred data. Service providers will be required to take appropriate measures to guarantee the confidentiality and security of personal data.

## 7. Cookies

Valk Exclusief uses cookies. A cookie is a small text file that is stored on the visitor's device (electronic device). The purpose of cookies is to collect information about someone, the website or statistics. Some cookies also have the purpose to improve the website's user experience.

### Types of cookies

We distinguish between functional and non-functional cookies. We always set functional cookies. They are necessary for the website to work properly. Non-functional cookies process personal data, without you noticing. They help us improve our services. They allow us, for example, to measure how often our website is used and what information visitors are looking for. We will always ask for your permission for non-functional cookies. We use the following non-functional cookies:

- a. **Analytical cookies** – with analytical cookies we collect statistics about the use of the website by users. By measuring website usage, the website can be improved for the benefit of the users. The storage of data includes:
  - the IP-address, which is masked in accordance with the guidelines of the privacy laws and regulations;
  - technical characteristics, such as the browser you use;
  - from which page you came to the web store;
  - which internet pages you visit.
- b. **Advertising cookies** – we use advertising cookies to display personalised advertisements and to measure the effectiveness of an advertising campaign. The advertising cookies are needed to actually display the advertisements.
- c. **Social** – cookies, with which the content of the Valk Exclusief websites can be shared on social media, including Twitter, Facebook, Google+, LinkedIn and YouTube. We have no influence on the cookies, set by social media, nor do we have any influence on their collected data.
- d. **Marketing** – cookies that allow us to offer relevant customised content. This may include relevant offers and information about our services. We operate by using our own channels and those of third parties and anonymised data regarding web-browsing, searching and purchasing behaviour. If you disable these cookies, you will still see advertisements, but they will be less relevant. These cookies also provide insight into the effectiveness of advertisements.
- e. **Other** - cookies that do not apply to the above categories, such as cookies that help to improve the user-friendliness of the website. These cookies remember preferences and interests, among other things. These may include language and currency preference, your favourite hotel and method of payments.

### **Block and remove cookies**

If you do not want our website to be able to store cookies on your computer, you can make this known in the cookie notification that will be on your screen during your first visit to our website. Have you already accepted our cookies? Then you will no longer see this message and you must delete the cookies (if desired) yourself. You can disable the setting of cookies by changing your browser settings. Please, note that certain functionalities on the website may not work or only partially work if you disable cookies.

### **Used cookies by third parties**

Valk Exclusief makes use of the services of the third parties below. These parties can also store cookies on your device, during the time, you use their services. At present, during this version of the privacy statement, Valk Exclusief uses:

- Feedbackify
- Cookiebar
- Sessie
- Login
- RequestVerification
- Facebook
- Google Analytics
- Google Tag Manager
- Hotjar
- Trengo
- Doubleclick
- Shoppingminds

### **Google Analytics**

Van der Valk uses Google Analytics. The last part of the website visitor's IP address is masked. We do not share any other data with Google through Google Analytics.

### **8. How long does Valk Exclusief store personal data?**

Valk Exclusief does not store personal data any longer than necessary for the purposes, stated above, unless it is laid down by law to store the data or you have given us your consent for the storage time.

Applicant data will not be used for longer than four weeks after the application procedure has been completed, unless you give us your consent for a longer storage period.

### **9. Security and measures**

Valk Exclusief maintains a high level of data security for applicants and staff members. Valk Exclusief takes appropriate organisational and technical measures in order to guarantee confidentiality and availability, as well as to prevent unlawful processing of personal data. Access to data by Van der Valk staff members occurs on the basis of necessity, given the position of the staff member in question (Need to know principle). Periodically Valk Exclusief tests the security of its data processing and underlying IT systems. In the event of outsourcing of data processing procedures to third parties we make arrangements with these parties about adequate security of personal data. The measures taken are in accordance with statutory laws and regulations. However, absolute (100%) protection of personal data cannot be guaranteed. If, despite the security measures taken, a security incident takes place, we will take measures to minimize the consequences with regard to your privacy.

### **10. Liability**

In view of the aforementioned under point 9, Valk Exclusief cannot be held responsible or liable for illegal, unauthorised or unintended processing and/or access to personal data that cannot be attributed to Valk Exclusief. We are also not responsible for the acts or omissions by third parties, we

collaborate with or to which we refer on our website(s) or in another manner. The relevant third parties are not covered by this privacy statement and we therefore recommend that you carefully read the privacy statements of these third parties on the websites. In all the aforementioned cases, Valk Exclusief accepts no liability and an applicant or (former) staff member is not entitled to compensation, compliance or any other claim against Valk Exclusief.

## **11. Your privacy rights**

As an Valk Exclusief applicant or staff member you can request access, correction, removal, objection, restriction or transfer of personal data. In addition you have the right to withdraw your initially granted consent. Any withdrawal of your consent is without prejudice to earlier consent-based processing.

### *a. Right to inspection*

You have the right to ask Valk Exclusief whether we process your personal data. If we do, you have the right to inspection with regard to the relevant personal data, the purpose of the processing, possible sources or recipients of these personal data and the storage time.

### *b. Right to rectification*

If the data information turns out to be incorrect, you can submit a request to have it rectified.

### *c. Right to erasure*

In the following cases, you can request us to erase any personal information about you that we have collected:

- The personal data are no longer required for the initial purposes, according to which we collected them or processed them otherwise;
- If the consent, which justifies the processing has been withdrawn by you;
- We process the personal data unlawfully;
- We must delete or erase your personal data in accordance with statutory laws;
- We have collected you data through mobile telephony or internet services.

### *d. Right to restriction of processing*

If you have reported an inaccuracy in your personal data to us or if you have objected to the processing, you can request us to restrict the processing, during the period of time, we are processing your request. You can also request us to restrict the processing if you believe that we are processing your data unlawfully or that we no longer need them for the processing purposes and that you need them for legal action.

### *e. Right to data portability*

If the processing takes place in accordance with your consent or the processing is carried out through automated processes, you can request us to transfer your personal data to you. You can also request us to transfer these data directly to another controller.

### *f. Right to object*

At all times you have the right to object to the processing of your personal data. This applies in particular to profiles, we have created and that are based on your personal data or if we use your personal data for direct marketing purposes.

If you wish to make use of one or more of your rights listed above, this can **only be done by sending an e-mail to the e-mail address of the hotel in question (please see appendix 1, privacy statement)**. Your request must meet the legal requirements. We may require you to identify yourself before we process a request. Valk Exclusief will inform you about its decision within four weeks, unless we will let you know, within that time frame, that we need more time.

Please, note that under circumstances or on the basis of statutory (privacy) laws and regulations, Valk Exclusief may refuse to fully or partially comply with your request.

### *Complaints*

If you have a complaint regarding the use of personal data, you are requested to send it to the aforcited address or e-mail address. If desired, you can also start a complaints procedure with the Dutch Data Protection Authority, the "Autoriteit Persoonsgegevens." This body is authorised to take cognizance of your complaint and it may decide to process the complaint.

## **12. Identity and contact details**

**For questions, comments or complaints about the processing of personal data, you can contact the hotel in question. The contact details can be found appendix 1 with the privacy statement. Please, state in the subject line that it concerns privacy and the nature of the request, which allows us to respond within the statutory period.**

For questions about this privacy statement you are requested to contact:

Valk Exclusief  
Privacy Coördinator  
Winthontlaan 4-6  
NL-3526 KV Utrecht  
**privacy@valkdigital.nl**

## **13. Changes in the Privacy Policy**

Valk Exclusief can make changes to the Privacy Policy. These will be made public instantly on the websites as listed in appendix 1 and they will apply to the Valk Exclusief Privacy Policy - immediately, completely and fully. It is why Valk Exclusief recommends that you check regularly if there are any adjustments.

## **14. Applicable law and competent court**

Dutch law applies to the Privacy Policy, Any disputes between parties will only be submitted to the competent judge of the Rechtbank Midden-Nederland.