

## Blauwtrust Group - Employee Privacy Statement Oct. 30, 2023

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The Blauwtrust Group (*hereafter* BTg) consists of the holding company Blauwtrust Groep B.V. and its subsidiaries Quion Groep B.V. (Quion Hypotheekbemiddeling B.V., Quion Hypotheekbegeleiding B.V., Quion Services B.V. and Quion Business Continuity B.V.), De Hypothekers Associatie B.V. and Dutch Mortgage Portfolio Management B.V.<sup>1</sup> (*hereafter collectively*: the business units). Within BTg, personal data are processed of (candidate) employees and of persons with whom we maintain a (potential) customer relationship on behalf of a lender.

BTg and the business units handle personal data with care, acting within the limits of the law, including the General Data Protection Regulation (AVG). Within the meaning of the AVG, BTg is a data controller for the processing of the personal data of (candidate) employees.

In this Privacy Statement, we inform you about the purposes for which BTg and the business units process personal data and about exercising your privacy rights.

### **1. From whom do we process personal data?**

We process personal data of all employees working at or for BTg and/or its business units. This includes, for example, the personal data of:

- Staff;
- Temporary, hiring and secondees;
- Applicants.

### **2. For what purposes are data processed?**

We process personal data in our records and use it for:

- Recruiting appropriate personnel.
- Managing and performing functional and administrative labor relations.
- Determining and paying salaries, allowances, monetary payments and awards.
- Creating a pleasant working atmosphere or out of good employment practices.
- Terminating and facilitating at the end or termination of an employment relationship.
- Facilitating security of the property and parking lot.
- Requesting an e-recognition account.

### **3. How do we get your personal data?**

In most cases, you provided it yourself. In addition to the information we receive from you, we may also receive data about you from third parties, such as (former) employers, the screening agency, a secondment organization or other third parties. We may also consult public sources to protect BTg and the business units.

### **4. What personal data do we process and why?**

Below is the type of personal data we may process and what we use it for.

#### *4.1 Recruiting suitable personnel*

- CV
- Motivation

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<sup>1</sup> Includes regulated business units, such as Clarian and HollandWoont.

- Screening Outcome
- Diplomas and references

If a person is hired then the data used for the purpose of establishing the employment relationship will be retained. Should a person not be hired, the data used during the application process will be deleted in accordance with the BTg retention period policy.

#### *4.2 Managing and performing functional and administrative labor relations.*

- CV
- Motivation
- Screening
- VOG (Certificate of Good Conduct)
- Proof of identity
- BSN
- Employment Agreement
- Employment
- Conversation cycle reports
- Information Form
- NAW / contact information
- Marital status
- Illness and sickness notification data
- Leave and overtime
- Correspondence

This data is necessary for the execution of the employment contract. In addition, we are required by law to process some data for government agencies, such as the Tax Office.

#### *4.3 Determining and paying salaries, allowances, sums of money and awards*

- Bank account number/IBAN
- Employment
- NAW / contact information
- Leave and overtime

This data is processed based on the execution of the employment contract. Without this data we cannot pay salaries

#### *4.4 Creating a pleasant work atmosphere or out of good employment practices*

- Anniversary or birthday
- NAW / contact information
- Emergency contact information

We use this data because we feel that we have a legitimate interest to send out reminders for an anniversary or birthday, for example, or feel it is necessary to inform your personal relations in the event of an emergency.

#### *4.5 Terminating and facilitating the end or cessation of employment relationship*

- Private e-mail address and details of any partner for the purpose of retirement
- Date of exit

We process this data based on the performance of the contract and our legal obligation. We use your e-mail address to send you information.

#### *4.6 Facilitating security of the property and parking lot*

- NAW data
- Department
- License plate

We process this data based on a legitimate interest. We consider it important that our premises are properly secured against unauthorized access by strangers, which is why your access card is linked to your identity. In addition, the barriers are set up so that specific employees have access to the parking lot. To be able to use the automatic opening of the barrier, we use your license plate number.

#### *4.7 Requesting an e-recognition account.*

Certain positions require the use of an e-Recognition account. An e-Recognition account is personal and must be requested from the central government by the employer. To request an account, it is required that we provide a copy of your valid identification.

#### *4.8 How do BTg and the business units handle my personal data?*

##### *With whom do we share personal data?*

BTg and/or the business units provide your personal data to third parties when we are legally obliged to do so or when there is an agreement entered into by you or us. Examples include the Tax Office (legally required in the context of the tax to be levied), but also the pension administrator (for collecting the premium based on the agreement).

In addition, we may provide personal data to parties (processors) who perform work for us. Parties can only receive our order if they have demonstrably taken appropriate security measures and guarantee confidentiality. An example is ADP; they provide us with (digital) HR services.

Below is a list of third parties who may receive or view your personal data:

- Pension administrator
- ADP
- UWV
- Health and Safety Service
- Training Institutes
- Employment agency
- Tax Office
- Leasing company
- Assessment or screening agencies

#### *4.9 Third party processor agreement*

When we provide personal data to third parties for a specific assignment, we use a processor agreement. In the processor agreement, we make arrangements with this party regarding the use and security of personal data.

#### *4.10 How long do we keep your personal data?<sup>2</sup>*

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<sup>2</sup> Information on retention periods can be requested from HR or [privacy@blauwtrustgroep.com](mailto:privacy@blauwtrustgroep.com)

We do not retain personal data longer than necessary. In doing so, we follow the BTg retention period policy. For example, we retain personal data of job applicants for 28 days after the completion of the application process. Employee personal data is generally retained for 7 years after termination of the employment contract.

## **5. Security, confidentiality and monitoring**

We treat your personal data with care and pay great attention to the security of personal data in our systems. For example, measures to secure our IT systems and prevent misuse. But also security of the physical spaces where personal data is stored. We have an up-to-date Information Security Policy and employees are periodically trained in the handling and security of personal data.

We have a Data Protection Officer who oversees how personal data is processed within BTg and the business units. We also have a fully equipped IT department supervised by a CISO and Privacy Officers who oversee the proper handling of personal data processing in relation to information security.

### *5.1 Employees of BTg and the business units*

All our employees have signed a confidentiality agreement and taken the financial sector oath or pledge. We handle personal data with care and only authorized personnel can view and process personal data of employees and job applicants (personnel data).

These authorized persons are employed or supervised by BTg. BTg may outsource the processing of personnel data to authorized employees of BTg and/or its business units abroad. Personnel data may also be processed outside the EEA by employees of BTg for reporting and administrative support tasks.

## **6. What privacy rights do you have?**

### *6.1 View*

You have the right to access your personal data and can generally access the personal data we process about you within one month of your request to us.

### *6.2 Correction*

You can ask us to correct inaccuracies in your personal data.

### *6.3 Remove*

You may ask us to delete personal data under certain circumstances. In that case, we will take all reasonable steps to notify other processors who process personal data on our behalf that you have requested deletion of links to and copies of your personal data.

### *6.4 Objection to processing*

If you object to certain processing of your personal data, you can indicate this.

### *6.5 Limiting processing*

You can ask us to restrict the processing of personal data under certain circumstances, such as if the accuracy of personal data is disputed.

#### *6.6 Portability*

You can ask us to obtain the personal data you have provided to us digitally, which we store automatically, in a structured, common and machine-readable form from us, for example, in order to then send it to a third party. This is called "data portability.

#### *6.7 Withdrawal of consent*

Where you have given consent for us to use your personal data, you may withdraw this consent, which will mean that we will no longer process the personal data you have consented to.

#### *6.8 Exceptions*

When exercising these rights, exceptions may apply, which means that certain rights cannot be exercised in all cases. For example, it may be that on the basis of a legal obligation or a more important legitimate interest, we do not (yet) or not completely remove your personal data. You will then receive a message about this.

### **7. Modification of Privacy Statement.**

Privacy laws are evolving. We may therefore amend this privacy statement to remain current. For example, in case of new developments, when our business operations change or as a result of a legal ruling. We encourage you to periodically review this Privacy Statement in the Policy house. If an important change is made, we will inform you via the intranet.

### **8. Questions, complaints and exercise of rights**

Do you have questions about how we handle your personal data? Please drop by the Data Protection Officer or send a message to [fg@blauwtrustgroep.com](mailto:fg@blauwtrustgroep.com)

If you wish to exercise your privacy rights, or if you have a complaint about the use of your personal data, please contact our Data Protection Officer in writing. You will receive a response within four weeks after receipt of your message. If we are unable to resolve a complaint together, you can report your privacy complaint to the Dutch Data Protection Authority (AP) or choose to go to court.

You can send your letter or email to:

Blauwtrust Group B.V.  
Attn: Data Protection Officer  
PO Box 280  
3000 CX Rotterdam

Email: [fg@blauwtrustgroep.com](mailto:fg@blauwtrustgroep.com)