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## Privacy statement Sekisui Eslon B.V. (Personnel and applicants)

### Introduction

Privacy is extremely important at Sekisui Eslon B.V. (hereinafter "Sekisui Eslon"). It uses personal data in an organised and safe manner. This privacy statement explains how data privacy is handled, which data is processed, and for what purposes. This privacy statement information also contains information pertaining to the rights of the involved party (hereinafter "data subject").

Questions or complaints relating to privacy can be sent to the department H&R ([privacy@eslon.nl](mailto:privacy@eslon.nl)). The data subject can also contact [the Dutch Data Protection Authority](#).

This privacy statement may be changed at any time. This version was last updated on June 6, 2023.

### Identity

Sekisui Eslon B.V. is:  
the Private Limited Company Sekisui Eslon B.V.  
Metaalweg 7  
NL-6045 JB Roermond (The Netherlands)  
Chamber of Commerce no. 13016183

### Which personal data is used?

Sekisui Eslon uses data provided by the data subject, and data that may have been provided by third parties.

You will find an overview of the purposes for which Sekisui Eslon processes personal data below.

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Purpose:	Personnel file
Data:	NAME, CV, assessments and interview notes, application details, email address, details on the new employee form, telephone numbers, payment details, partner phone number, employment contract, proof of identity, sick leave information
Legal basis:	Performance of the agreement
Retention period:	Two years after termination of employment

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Purpose:	Payroll administration
Data:	Name and address, bank details, financial details, (traffic fines, bonuses, attendance information, pension information, salary (mutations), tax information, absenteeism information
Legal basis:	Performance of the agreement / legitimate interest / legal requirements
Retention period:	Two years after termination of employment, but no earlier than seven years after the end of the financial year.

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Purpose:	Leave administration
Data:	Name and address, leave administration, date of employment
Legal basis:	Performance of the agreement / legitimate interest
Retention period:	Two years after termination of employment

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Purpose:	Application
Data:	CV, application letter, name and address details, emails, LinkedIn details, assessment, telephone numbers
Legal basis:	Unequivocal permission
Retention period:	Six months after the end of the application procedure, if someone is hired, this information will be included in the personnel file

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Purpose: Offering an account

Data: Name, Address, Email address, Username, Password

Legal basis: Processing of the agreement

Retention period: Six months following the removal of the account

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Purpose: Verifying identity

Data: Electronic identification data

Legal basis: Processing of the agreement, legitimate interests

Retention period: Six months following the removal of the account

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Purpose: Securing data

Data: Password, user name

Legal basis: Processing of the agreement

Retention period: Six months following the removal of the account

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Purpose: IT-system maintenance

Data: All data provided

Legal basis: Legitimate interests

Retention period: As long as necessary for this purpose

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Purpose: Email communications

Data: Emails, Email address

Legal basis: Processing of the agreement, legitimate interests

Retention period: As long as is necessary for this purpose

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### **Notes regarding data on sick leave**

Sekisui Eslon also processes in its personnel file and payroll administration data relating to employees' sick leave. These data relate only to an employee's sick and better report and any messages from the company doctor or absence management organisation addressed to the employer.

### **Fraud investigation in (computer) systems**

Sekisui Eslon considers it important to provide a safe (working) environment to all its employees, customers, suppliers and other stakeholders. It also considers it important to safeguard its own interests as a company and to protect its assets from improper influences.

To ensure this, it may be necessary in a specific case to conduct searches in email boxes, computers, networks and/or other data carriers. Such data carriers may contain personal data of employees, customers etc. etc.

Sekisui Eslon therefore reserves the right, in case of a well-founded suspicion of unlawful action and/or breach of contract, to conduct an investigation (or have an investigation conducted) into all data carriers made available by it to employees or used by employees for business purposes. Such an investigation shall include keeping track (logging) of a particular person's behaviour.

Sekisui Eslon shall not carry out such an investigation (or have such an investigation carried out) until it has obtained legal advice to that effect, whereby a reasoned weighing up has been made between the interest in the investigation on the one hand and the data subject's interest in privacy on the other, and it has been investigated whether there are no less drastic measures reasonably available. This shall be recorded in writing and, as soon as practicable whether no less intrusive measures are reasonably available. This shall be recorded in writing and, as soon as possible without prejudice to the interests of Sekisui Eslon, made available to the employee.

Sekisui Eslon will take into account the privacy interests of the person concerned when conducting (or having conducted) such an investigation and will design the investigation in such a way as to limit the intrusion on privacy as much as possible.

Sekisui Eslon will inform the data subject about the conduct of the investigation as soon as possible without compromising the interests of Sekisui Eslon.

## Rights of the party concerned

The data subject has the following rights with regard to his or her personal data and the processing thereof:

### *Access*

The data subject may at any time request access to his or her personal data as processed by Sekisui Eslon. The provided overview will include processed personal data, processing methods and processing purpose. Sekisui Eslon may hereby legally request a fee.

### *Amendments*

The data subject is entitled to submit a request to change, correct, supplement, delete and/or protect his or her personal data.

### *Processing limitations*

Subject to conditions, the data subject is entitled to limit processing of his or her personal data.

### *Objections*

Should Sekisui Eslon perform specific processing on the basis of the legitimate interests of itself or a third party, the data subject has the right to object to such processing.

### *Transfer of data*

The data subject is entitled to request his or her personal data. Sekisui Eslon will provide this data in a structured and generic form, which can easily be opened by other commonly implemented systems

### *Withdrawal of permission*

The data subject is entitled to withdraw permission for a specific processing method. Should data processing take place using this method, Sekisui Eslon will cease processing that data subject's data. Withdrawal of permission has no retroactive effect.

Sekisui Eslon will respond to a request regarding this right within a period of one month.

Such requests may be addressed to the department H&R ([privacy@eslon.nl](mailto:privacy@eslon.nl)).

Sekisui Eslon will always give reasons for the rejection of a request.

## Share with third parties

Personal data may be passed on to processors and third parties involved in the execution of the agreement.

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### **Data transfer outside of the E.U.**

It may be necessary to pass on personal data to a third party in a country outside the European Union. Regulations in the field of privacy protection are different in these countries than in the Netherlands. This is why Sekisui Eslon implements Privacy Shield or EU Model Clauses to protect the privacy of those involved as much as possible. If privacy protection is not possible, Sekisui Eslon will request permission to pass on personal data to countries without adequate levels of data protection. This permission can always be withdrawn. Permission withdrawal by the data subject has no retroactive effect.