

## We Are Social – privacy notice for applicants

We Are Social B.V. ("**We Are Social**", "**we**", "**us**" or "**our**") is the "data controller" of personal data which is collected from you when you apply for a role at We Are Social B.V.

Our corporate information is as follows:

We Are Social B.V. is a company registered in the Netherlands (registered number 85230154) whose registered address is at Keizersgracht 391A, 1016 EJ Amsterdam, the Netherlands.

Privacy is very important to us and therefore we have created this privacy notice to tell you what personal data we collect from you when you apply for a role with us, including how we use your data, how we share it with others and how you can manage it. If you have any questions whatsoever about this privacy notice, then we would be glad to answer them; our contact information is [privacy.nl@wearesocial.net](mailto:privacy.nl@wearesocial.net)

Please read this privacy notice before you apply for a role with us, as it will apply to the processing of your personal data in the context of your application.

This version of our privacy notice is live from April 8<sup>th</sup> 2022.

### 1. What is "personal data"?

Under the GDPR "personal data" is defined as:

*"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".*

As a result, "personal data" includes, amongst many other things, your name, address, phone number, email address and any other information that could be used to identify you, either by itself, or together with other information.

### 2. What personal data of mine will We Are Social collect when I apply for a role?

When you apply for a job with us, we collect the data that you input or include as part of your application by filling in and uploading information on the We Are Social Website. The personal data will include:

- Personal contact details such as name, title, address, telephone numbers, and personal email addresses
- Resume and any information on resume (including date of birth, references, courses taken, photographs and social media profiles)
- Cover letter and any personal data included in your cover letter
- Any content of references or recommendation letters
- Social media profile such as your LinkedIn profile
- English language level
- Educational history
- Preferred location of employment and start date, and salary expectations
- Employment records (including job titles, work history, training records and professional memberships)
- Information about your visa or residence permit
- Any other information voluntarily provided by you

We will not process special categories of personal data.

We will collect personal data directly from you when you apply for a position through the website of We Are Social or when we contact you with a suitable position. In addition, we may collect your personal data from third parties, such as a recruitment consultants, professional recruitment agencies, temporary work agencies, your references or testing agencies, to the extent permitted by applicable law.

### **3. Why and how does We Are Social collect and use my personal data?**

We use all of your personal data as included in paragraph 2 of this privacy notice for the purposes included below.

- Your application. We will process your personal data for considering you for a role with us, which may be the specific role that you have applied for, or a role that may arise in the future that we feel you may be suitable for during the period in which we retain your personal data. This includes evaluating your qualifications and assessing your fitness to work.

We will process the personal data for entering into and managing a contract or employment relationship, for our legitimate interest (e.g. recruitment and management purposes) or based on your consent. We will process the personal data for a duration of four weeks after the end of the application process, unless the processing is based on your consent. Where you have explicitly consented thereto, we will process the personal data for a period of one year (and only the personal data that is relevant for such longer retention).

You have the right to withdraw your consent at any time, after which we will delete your personal data. Withdrawal of your consent does not affect the legitimacy of the processing prior to that moment.

- Recruitment marketing. We will process your personal data for custom audience purposes, talent pool creation for future job openings and to contact you in case we have a new job position open which may be suitable for you.

We will process the personal data for entering into and managing a contract or employment relationship, for our legitimate interest (e.g. recruitment and management purposes) or based on your consent. We will process the personal data for a duration of four weeks, unless you consented to a period of one year. We will delete your personal data when you withdraw your consent.

You have the right to withdraw your consent at any time, after which we will delete your personal data. Withdrawal of your consent does not affect the legitimacy of the processing prior to that moment.

- Employment contract. In case of positive recruiting results, we will process your personal data for preparing a job offer and employment contract and providing onboarding activities in case of a successful application.

We will process the personal data for entering into and managing a contract or employment relationship. We will process the personal data for the period until we entered into an employment relationship with you.

- Legal obligations. We will process your personal data to comply with our legal obligations or administrative orders, and to exercise or defend legal claims.

We will process the personal data to comply with our legal obligations (e.g. to comply with requests from authorities) or for our legitimate interests (e.g. protecting our business). We will

process the personal data as long as necessary for this purpose (which may be longer than the agreed four-week or one-year retention period).

#### **4. Who do you share my personal data with?**

We would never share your personal data with third parties for their own marketing or business purposes without your consent, without it being required as part of a contractual obligation between us or without us being subject to a legal obligation to do so. However we may share your personal data with the following parties:

- third party service providers for, amongst other things, web hosting, web security, web analytics, data storage, data back-up services, recruitment services and email services.
- other entities within the We Are Social group, including We Are Social S.r.l. which will be involved with the processing for evaluation purposes.
- competent (supervisory) authorities, institutions or government agencies, to the extent necessary to comply with applicable laws and to institute, carry out or defend ourselves in legal proceedings.
- recruitment consultants, professional recruitment agencies, temporary work agencies, your references or testing agencies that may assist us during the applications process, for example by assisting us in assessing your fitness to work or selecting suitable candidates.

We take steps to ensure that any third parties who handle your personal data comply with relevant data protection laws and protect your personal data and in any event, these third parties are limited in their ability to use your personal data for reasons other than providing services to us.

#### **5. Transfer of personal data**

Due to the nature of the service providers we are engaged with, which often operate in the 'cloud', your personal data may be used or stored outside of the EU. It is therefore important to ensure a level of protection of the data transferred which is essentially equivalent to that guaranteed in the EU. We will therefore only transfer your personal data to third parties outside the EU to the extent that:

- the third party involved falls under the adequacy decision of the European Commission determining that the relevant country provides an adequate level of protection to the personal data; or
- an appropriate safeguard is in place, in accordance with applicable data protection law, such as the implementation of specific contracts approved by the European Commission (i.e. the standard contractual clauses).

In addition, We Are Social is committed to ensure that it complies with any additional requirements or guidelines from the European Court of Justice, data protection law and/or supervisory authorities in relation to the transfer of personal data.

Should you have any queries in relation to international transfers, please contact us by post email, as set out above and we would be glad to confirm whether a transfer has been made on the basis of a European Commission decision or standard data protection clauses and, in the latter case, provide a copy of such clauses.

#### **6. How long will you keep my personal data for?**

We will only store your personal data for as long as necessary for the purposes described in this privacy notice. Details on the relevant retention periods are included in paragraph 3 of this privacy notice.

#### **7. How can I manage my personal data?**

At any point while we are in possession of or using your personal data, you have the following rights:

- Right of access – you have the right to request a copy of personal data that we hold about you;

- Right of rectification – you have a right to correct the personal data that we hold about you that is inaccurate or incomplete;
- Right to be forgotten – in certain circumstances, you can ask for the personal data that we hold about you to be erased from our records;
- Right to restriction of processing – in certain circumstances, you have a right to restrict our use of your personal data;
- Right of portability – in certain circumstances, you have the right to have the personal data we hold about you transferred to another organization;
- Right to object – you have the right to object to certain ways that we use your personal data, such as direct marketing; and

In addition, you will always have the right to withdraw your consent at any time where the processing of your personal data is based on your consent. Please note that should you withdraw your consent, we will not be able to consider you for a role with us until such time as you make a further application.

Reasonable identification will be required from you if you exercise any of your rights above. In order to exercise any of your rights, please contact us by post email, as set out above.

We aim to respond to your request within one month after receiving such a request. However, this one-month term may be extended with two months. In such event, we will inform you within one month after receipt of your request and explain why the extension is necessary.

Please note that you have also the right to lodge a complaint at any time about us and the manner in which we collect and use your personal data with any supervisory authority of the EU member state in which (a) you work, (b) you live or (c) an alleged infringement has taken place. The supervisory authority in the Netherlands is the Autoriteit Persoonsgegevens. You can lodge a complaint to the Autoriteit Persoonsgegevens via the following website: <https://autoriteitpersoonsgegevens.nl/nl/meldingsformulier-klachten> (only in Dutch).

## **8. Changes to this privacy notice**

We may amend this privacy notice from time to time. We will note the date on which the last revisions were made at the top of this privacy notice. We will notify you of any material changes to this privacy notice and invite you to check the privacy notice from time to time to review the most current version.