

# Privacy statement

## Our vision on privacy

Financial Process Innovation B.V. (FPI) helps organisations with consultancy and to search for, find and select external professionals and to support in the recruitment of permanent staff. We refer to external professionals as being 'experts'. From day one we believed in a transparent labour market, and believed in a transparent privacy policy. We consider the privacy of our experts, people who we contact at suppliers and clients, applicants, employees hired by FPI, and other business relations highly important. Within FPI, we weigh up all of the interests and consider your right to privacy to be extremely important. This privacy statement explains how we have always protected your privacy and how we handle your personal data.

## Who processes your personal data?

Financial Process Innovation B.V., registered at the Chamber of Commerce under number 65622111, (referred to as: 'FPI'), processes personal data. Do you want to know more how FPI is processing your data? Please contact us, we will provide you with this information.

## What is personal data and when is it processed?

Personal data includes all of the data that can be used to identify a person. Are you self-employed (Dutch abbreviation: ZZP)? Then you are legally considered to be a person and personal data will also concern data that, directly or indirectly, say something about you. You have already shared personal data with us when you contacted us. For instance, your name, telephone number and/or e-mail address.

Specific personal details are considered to be sensitive data. We do not process these specific personal details. We only process specific personal data if this is required for the service we provide and if we are statutorily obliged to do so, if this is done with your consent or if you ask us to do so.

'Processing' personal data is generally understood to mean performing any action on it, for instance, collecting, storing, using, forwarding or deleting personal data.

## Subject of data processing?

We process personal data from people with whom we have, want to have or have had a direct or indirect relationship. For instance, this means personal data from:

- Experts;
- People related to the suppliers;
- People related to the clients;
- People interested in our services;
- People who are related to another company or another organisation with which we have, want to have or have had a business relationship.

## How do we get your personal data?

We receive your data because you give them to us, for instance, when you enter into an agreement with us, when you provide us with your profile or when you use the service we provide. We can also receive your data from third parties. For instance, from suppliers or other parties with which we collaborate. We have agreed with our suppliers that when they forward your personal data, they will inform you about our and also their own privacy statement in which they have to state that they are allowed to forward your personal data.

## For what purposes and on what grounds do we process personal data?

FPI can only perform its activities effectively if we know you well. Therefore, we ask for and process your personal data. FPI classifies its activities into various main services. Below is an explanation of the personnel data we process for each main service, the purpose for which we process it and on which grounds.

## Recruitment

We search for suitable freelance experts to carry out temporary activities for our clients or for experts to become permanent employees at our client. FPI comes into contact with these experts in various ways. In the first place by them applying directly to FPI. In the second place, an expert can be recommended to us via an FPI business contact or supplier. In both cases, FPI will process the expert's personal data. We process this personal data for our recruitment and selection activities and to be able to establish where the expert can be deployed. These personal data must be processed to be able to contact the expert, to investigate whether the expert can be deployed for a client's projects and mandate, to be able to enter into a contract with (the supplier of) this expert, but also to enter into a contract with a client regarding the employability of the expert. FPI has a justified interest in processing the personal data of the expert, because this makes it possible to select the appropriate expert for the client and the contract.

The personal data of the expert that we process for our recruitment service, include name and address details, date and place of birth, e-mail address, telephone number, curriculum vitae (CV), education details (including the highest-level diploma) and other details that can be of interest when assessing the suitability of the expert for a certain job, for instance references and attestations.

## Pre-employment screening

Once the expert has been selected by the client, a pre-employment screening will be required by our client, often performed by external contract

management parties selected by the client.

Screening is always a customised activity and depends on the requirements set by the client. Once the client has a justified reason for performing this screening, which is more important than the expert's (privacy) rights, we share more expert's personal data to be able to assess the expert's suitability and integrity with respect to a specific position. The specific nature of the position can mean that (strict) pre-employment screening is required. For certain positions, especially in the financial sector, screening is even a statutory requirement.

When a pre-employment screening is performed, we always share the name and the address details of the expert to be screened. We also share, among other data, the date and place of birth, e-mail address, telephone number, recent curriculum vitae (CV), educational details and other details that could be of interest within the framework of assessing the expert's suitability. Dependent on the degree of pre-employment screening, we also share information from (ex-) employers and/or clients, details about the expert's labour history (e.g. data related to suspension and dismissal), a Verklaring Omtrent het Gedrag ('VOG' - certificate of good conduct) or a Verklaring van Geen Bezwaar ('VGB' - declaration of no objection) and an overview of the secondary functions performed.

## Contract management

When FPI enters into a contract with (a supplier of) an expert or a client, the expert's personal data must be processed. These personal data are required to maintain and meet the contract. We are also often legally obliged to help in establishing the identity of an expert when he or she is employed on a contract. FPI also has to take into account the client's obligations arising from the Wet Ketenaansprakelijkheid (Dutch Sequential Liability Act). Based on these statutory obligations, we could also have to include certain (financial and fiscal) data of an expert in our records.

The expert's personal data that we process within the framework of contract management include the name and address data, nationality, gender and a BSN (citizen service number) and/or ID number.

## Procurement administration/salary processing and invoicing

FPI receives and sends invoices related to the expert's activities. The timesheets for these invoices include personal data, namely the expert's name and the name and contact data of the client's manager. These personal data must be processed to execute the contract and enables FPI to pay the invoices relating to that contract.



# Privacy statement

## Clients/suppliers

If a supplier or a client wants to purchase a service from us, FPI requires personal data from one or more of the contacts at the organisation. These personal data are needed to enter into, for instance, a contract or hiring contract with this organisation or to contact this organisation about current business. If you are one of our suppliers or clients, of course we want to provide you with a good service. To do so, we also process your personal data. For instance, we use your name and (business) address data to maintain contact with you. We can also use these data to establish, for instance, whether you are allowed to represent your organisation. If this is the case, we also have a justified interest in processing these personal data.

## Applicants

We process personal data from applicants for positions via FPI. The personal data that you share with us, including name and address details, date and place of birth, e-mail address, telephone number, curriculum vitae (CV), educational details and other details that can be of interest within the framework of assessing the suitability for a certain job, for instance references and attestations. We handle these personal data with great care. FPI has a justified interest in processing the personal data of its applicants, as that makes it possible to select the appropriate person for the job.

## Workers hired by FPI

When FPI hires workers, it enters into a contract with (a supplier of) an expert. To do so, FPI must process the expert's personal data. The expert's personal data that we process to enter into the contract include your name and address data, nationality, gender and a BSN (citizen service number) and/or ID number.

## Newsletters, magazines and other messages

We can send our clients, suppliers, experts and other business relations newsletters and emails containing substantive and professional items and/or other messages dealing with the latest developments in the sector. To be able to send our messages to the relevant people, we use the name and e-mail address of these people. We send these messages to people who have given us permission to do so. You can also unsubscribe to these publications/messages at any time at no costs.

## How do we handle your personal data?

FPI has always taken appropriate technical and organisational measures to protect your personal data and to avoid abuse. We ensure that our systems have the maximum protection. Our systems are updated on a regular basis. We also

frequently ask for advice related to the security of our systems from reputable market parties. We do this to protect your personal data as well as possible. We resolve and record data leaks. If required, we also report them to the Autoriteit Persoonsgegevens (within 72 hours) and to the parties involved. Within FPI, your personal data can only be accessed by employees who have been granted access and are authorized to do so to perform their job.

## How long do we keep your personal data?

Your personal data are secure and kept no longer than necessary for the purpose for which they have been processed, unless we have received your permission to keep them for a longer period of one (1) year. We operate a storage policy which states how long we can keep data. The personal data that we have processed within the framework of a contract with a client are kept for five (5) years after the termination of the contract, unless we have reason to keep them longer. For fiscal data, we employ the legal storage term of seven (7) years. Data that we have received from you for a selection process for a contract for which you have not been selected are kept for up to six (6) months after the end of the selection procedure, unless you have given us permission to keep your data longer, for instance, because a suitable position for you could possibly arise at a later date.

## Do we share your personal data with others?

There are strict rules related to sharing personal data with third parties. We do our utmost to adhere to these rules wherever possible. We only share your personal data with third parties if we have the statutory obligation to do so, because we have to implement an agreement with you or because we employ another service provider. For instance, Autoriteit Persoonsgegevens and the Tax Authority can request data from us based on the legislation. A judge can also request us to provide data. Furthermore, in a situation where FPI suspects fraud, we are obliged to report this to the competent authorities. Sometimes, based on an agreement, we are obliged to share your data with another party or organisation. For instance, FPI shares an expert's personal data with clients that are interested in employing the expert for a contract. We also provide your personal data to other parties that we need to work with to provide our service. For instance, FPI can share experts' personal data with an external party that checks the identity details of the experts who are employed on a contract or to request a Verklaring Omtrent het Gedrag ('VOG' - certificate of good conduct). In addition, to be able to process the salaries of experts who are in

paid employment via FPI's partners, data are shared with an external party. Moreover, FPI uses various processing organisations. We have entered into contracts with these organisations to ensure that they guarantee handling your personal data with care. In addition, these organisations guarantee that they will adhere to the existing privacy legislation. We can also provide your personal data to other clients or companies. FPI has written agreements with Third Parties including the handling of personal data of applicants. These Third Parties do also conform to the GDPR legislation.

## What rules apply when processing personal data?

As of 25 May 2018, FPI is bound to the General Data Protection Regulation (Algemene Verordening Gegevensbescherming - AVG) with respect to the processing, the storing and the retention of personal data in the Netherlands.

## View or amend your personal data?

Do you want to know what personal data we have recorded from you? You can request from us an overview of the personal data we have processed. Do you think that your personal data have been incorrectly or incompletely processed or do you think that they should not have been processed? If so, you can request FPI to change, supplement or delete the data. You are also entitled to object to your personal data being processed and you are entitled to data transfer. In addition, you are entitled to withdraw any previous permission you have given. If you send us such a request, we will as soon as possible, but in any case within four (4) weeks of receiving your request, explain to you the actions we have taken.

## Questions or complaints?

For questions or complaints about how FPI processes personal data, please contact us by sending an e-mail to [info@fpi-nl.com](mailto:info@fpi-nl.com) or sending your written request to:  
Financial Process Innovation B.V.  
Request to inspect personal data  
Ginnekenweg 157  
4818 JD Breda

## Personal Data Authority - Complaints

The Competent Personal Data Authority (Autoriteit Persoonsgegevens) monitors whether FPI adheres to the AVG. If you are of the opinion that FPI does not adhere to the applicable privacy legislation, you are entitled to file a complaint with the Personal Data Authority.

# Privacy statement

## About this privacy statement

The regulations related to privacy legislation regularly change. Therefore, our privacy policy is never totally complete. We keep our policy up to date. As a result, FPI can change this privacy statement from time to time. If these changes are also important for you, we will point this out to you or notify you of the changes in a clear way. The most up-to-date version of our privacy statement can always be found on [\[www.fpi-nl.com/56-privacy-statement\]](http://www.fpi-nl.com/56-privacy-statement). This privacy statement was last changed on 24 May 2018.

## Disclaimer

FPI takes every care with this website, but cannot guarantee the accuracy of the information. Financial Process Innovation B.V. cannot be held responsible for the content of the site or for the use that may be made of it. The entire website is the exclusive property of Financial Process Innovation B.V. Information on this site may be used for information purposes by the visitor, excluding any reproduction, distribution or exploitation for the benefit of third parties. Personal information that you may provide to Financial Process Innovation B.V., will be included in the database of Financial Process Innovation B.V. This data is used by Financial Process Innovation B.V. for administrative information purposes only.

## Responsible Disclosure Policy

At FPI, we consider the security of our systems to be of utmost importance. In spite of the care we take for the security of our systems, it can happen that a weak point remains. If you have found a weakness in one of our systems, we would like to hear about it so that we can take appropriate measures as quickly as possible. Weak points can be discovered in two ways: you accidentally come upon something during the normal use of a digital environment, or you explicitly do your best to find a weakness. Our responsible disclosure policy is not an invitation to actively scan our portals to discover weak points. We monitor our portals ourselves. Our responsibility to our customers means that our intention is not to encourage hacking attempts on our infrastructure. However, we would like to hear from you as quickly as possible if vulnerabilities are found in our portals, so that we can resolve them adequately.

## We ask that you:

- E-mail your findings as quickly as possible to [info@fpi-nl.com](mailto:info@fpi-nl.com);
- Do not abuse the vulnerability, for example by downloading, editing or deleting data. We will always take your report seriously and investigate any suspicions of a vulnerability, even without 'proof';
- Do not share the problem with others until it has been resolved;

- Do not make use of attacks on physical security, of social engineering or hacking tools, such as vulnerability scanners;
- Give adequate information for the problem to be reproduced so that we can resolve it as quickly as possible. Usually, the IP address or the URL of the affected system and a description of the vulnerability are enough, although more information might be necessary for more complex vulnerabilities.

## What we promise:

- We will respond to your report within 3 business days, with our evaluation of the report and an expected resolution date;
- We will handle your report confidentially, and will not share your personal information with third parties without your permission. An exception to this is the police and judiciary in the event of prosecution or if information is demanded;
- We will keep you informed of the progress of the solution to the problem;
- In communication about the reported problem we will state your name as the discoverer, if you wish;

We strive to resolve all problems as quickly as possible, to keep all involved parties informed and we would like to be involved in any publication about the problem once it is resolved.

---

## Financial Process Innovation

Ginnekenweg 157  
4811 NV Breda  
The Netherlands  
Telephone: +31 (0) 76 533 5441  
Contact: [info@fpi-nl.com](mailto:info@fpi-nl.com)  
Website: [www.fpi-nl.com](http://www.fpi-nl.com)

