



## PRIVACY STATEMENT FOR RECRUITMENT

GADOT BELGIUM BV, with registered office at BELGICASTRAAT 3, 9042 GENT and company number 0455.791.320 RPR Gent ("GADOT BELGIUM BV") respect your privacy and comply with the EU General Data Protection Regulation, (EU) 2016/679 ("GDPR").

This Privacy Statement applies to the recruitment section of the GADOT BELGIUM BV website (<https://www.gadot.be/careers/>) where you can find the current vacancies and career opportunities at GADOT BELGIUM BV and where you, the Candidate, can apply for vacancies by sending your application to an e-mail address at GADOT BELGIUM BV ("Recruitment").

This Privacy Statement describes the privacy practices of GADOT BELGIUM BV specifically for Recruitment when collecting, processing, using, storing, transferring and disclosing personal and personally identifiable Personal Data obtained from or about you, both online and offline ("Personal Data").

If you do not agree with the privacy statement of GADOT BELGIUM BV, please do not pass on any Personal Data to GADOT BELGIUM BV.

The general privacy statement of GADOT BELGIUM BV and the definitions used in this privacy statement can be found here: <https://www.gadot.be/privacy-statement/>.

### Introduction

GADOT BELGIUM BV collects, uses and processes your Personal Data as legally permissible under data protection laws.

"Data Protection Laws" means: all data protection laws applicable in the European Union to the processing of Personal Data in the context of this Privacy Statement, including local, national and/or foreign laws, treaties and/or regulations ("EU Data Protection Laws") such as, but not limited to, the General Data Protection Regulation (EU) 2016/679 ("GDPR"), and the transposition of the EU Data Protection Laws into national law.

"Processing" means any operation or set of operations which is performed upon Personal Data or sets of Personal Data, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

GADOT BELGIUM BV collects Personal Data about Candidates through received applications in the event that a Candidate visits the jobsite of our website or through personal contact such as phone calls or electronic messages. GADOT BELGIUM BV only collects Personal Data that are adequate, relevant and not disproportionate for the recruitment process, excluding any sensitive Personal Data of the Candidate.

### Legal basis

GADOT BELGIUM BV may process your Personal Data on the basis of the following legal grounds:

- Consent - when you give your express consent on our website or by e-mail, e.g. when you submit and send your application for a vacancy to GADOT BELGIUM BV.
- Compliance with a legal obligation - GADOT BELGIUM BV may be legally obliged to process the Personal Data for a legally determined purpose.
- Legitimate Interests - GADOT BELGIUM BV may process Personal Data without your express consent if GADOT BELGIUM BV has a genuine and legitimate business reason,. For Recruitment GADOT BELGIUM BV legitimate interests are the recruitment, assessment and selection of candidates for employment and the progress of their application.

GADOT BELGIUM BV undertakes to use all Personal Data only in a fair and lawful manner, in accordance with the applicable data protection laws, both for collection and processing.

Personal Data provided by a Candidate to GADOT BELGIUM BV will only be used by GADOT BELGIUM BV to support the recruitment process and exclusively for recruitment purposes. Candidate Data will not be sold to third parties.

### Personal data collected by GADOT BELGIUM BV

Personal data collected by GADOT BELGIUM BV may also be included:

- your name, title, contact details such as telephone, mobile, or e-mail and/or postal address when you communicate electronically, by telephone or in writing with an employee or representative of GADOT BELGIUM BV;
- additional information provided voluntarily and with your consent in response to a job application, such as a CV, criminal record, diplomas, family composition, job references and related information;
- report from the interviewer or recruiter;
- salary expectations;

In addition, GADOT BELGIUM BV may collect information from third parties (e.g., but not limited to, recruitment agencies, referrals, career platforms, professionally oriented social media, etc.), for example in connection with a background or employment check and/or employment reference. ), for example in connection with a background or employment check and/or an employment reference, to the extent possible and permitted under applicable law.



## Why GADOT BELGIUM BV collects Personal Data

GADOT BELGIUM BV uses the data it collects online or offline for the following purposes:

- (1) to attract suitable staff and employees to work for GADOT BELGIUM BV
- (2) To feed its Human Resources database and manage all Personal Data collected from Candidates in such Human Resources database.
- (3) To support or evaluate our recruitment process
- (4) to process online applications for vacancies and spontaneous applications
- (5) To ensure the management of the recruitment and hiring processes of GADOT BELGIUM BV and the compliance with corporate governance and legal and regulatory requirements. If you are hired, the information may be used in connection with employment and company management.
- (6) for sending communications, including promotional communications relating to vacancies, surveys or event

## Processors of Personal Data of Candidates

The table below shows the external processor GADOT BELGIUM BV uses for recruitment, with links to the respective Privacy Policies and Opt-out/Preferences Settings: **NO RECRUITMENT SOFTWARE IS USED AT THIS TIME**

## Collection, use and processing of the Candidate's Personal Data

GADOT BELGIUM BV may disclose certain Candidate Personal Data to a supplier, partner or consultant in order to provide services that require the use and/or creation of Candidate Personal Data for the purposes described in this Privacy Statement and in accordance with applicable data protection laws. In these limited cases, selected third parties may be given access to Candidate's Personal Data. All such third parties are bound by high standards of security, confidentiality and non-disclosure.

GADOT BELGIUM BV will disclose the Candidate's Personal Data if required to do so by law, by the authorities or in cases where it is obliged to do so in order to protect its rights in accordance with applicable legislation.

Candidate-Personal Data will be available to all recruiters of GADOT BELGIUM BV.

In case of business necessity GADOT BELGIUM BV reserves the right to keep the Personal Data of the Candidate, so that GADOT BELGIUM BV can contact the Candidate in case of a suitable vacancy.

## Storage, transfer and disclosure of Personal Data

GADOT BELGIUM BV hosts our website and the Human Resources Software only on its servers in the EU. Your Personal Data collected offline or online may be stored and processed in an EU country where GADOT BELGIUM BV operates.

Candidate-Personal Data protected under GDPR will be kept for a maximum of one year after the end of the recruitment process. After the retention period, the Candidate Personal Data will be deleted.

Insofar as this is not contrary to legal requirements or a legitimate interest of GADOT BELGIUM BV, GADOT BELGIUM BV will delete your Personal Data and your profile in the Human Resources database, as applicable, as soon as you inform GADOT BELGIUM BV that you no longer wish GADOT BELGIUM BV to process your Personal Data. Please contact [stephanie.heyman@gadot.com](mailto:stephanie.heyman@gadot.com) with the appropriate request.

GADOT BELGIUM BV may disclose and transfer Personal Data to IT providers, subcontractors and other external service providers who assist in the operation of our website or the Human Resources software.

GADOT BELGIUM BV may disclose and transfer Personal Data to a third party in connection with a merger and acquisition or other similar activities.

## Access, correction and deletion of Personal Data

You can request GADOT BELGIUM BV via [stephanie.heyman@gadot.com](mailto:stephanie.heyman@gadot.com) to change, delete or limit the processing of your Personal Data. GADOT BELGIUM BV will do everything reasonably possible to fulfil your request. However, GADOT BELGIUM BV may limit access to your Personal Data where such access would be unreasonably burdensome or expensive under the circumstances, or where otherwise permitted by international standards. In order to protect your privacy and the integrity of your Personal Data, GADOT BELGIUM BV may take reasonable steps to verify your identity before responding to your request, and to validate any request that affects your Personal Data when presented anonymously or when made on an assumed name.

## Technical and organizational measures

In order to guarantee the integrity, confidentiality and availability of Personal Data and to protect the Personal Data stored against illegal access, improper use, alteration, unlawful or accidental destruction and accidental loss, GADOT BELGIUM BV uses various technical, physical and organisational security measures and this according to the latest technologies.

GADOT BELGIUM BV undertakes to implement at all times adequate security measures to protect the manual and electronic processing of Personal Data and to prevent their misuse, in accordance with the applicable local legal requirements and contractually, so that third parties and affiliated companies processing Personal Data again comply with the security measures in accordance with the applicable local legal requirements.



#### **Rights of the data subject under the GDPR**

Candidates have various rights in relation to the processing of Personal Data. Candidates have (depending on the circumstances) the right to request access to Personal Data (Article 15 GDPR), rectification (Article 16 GDPR) or erasure (Article 17 GDPR), restriction of processing (Article 18 GDPR), a right to object (Article 21 GDPR) and a right to data portability (Article 20 GDPR). If the processing is based on consent, you may withdraw it at any time.

If you believe that the processing of your Personal Data is in breach of the GDPR, you have the right to lodge a complaint with a supervisory authority.

More information can be found in the Privacy Policy of GADOT BELGIUM BV on the Website <https://www.gadot.be/privacy-statement/> under "Rights of the Data Subject".

#### **GADOT BELGIUM BV Data Protection Officer**

If you have any questions about the processing of your Personal Data by GADOT BELGIUM BV or any request for the exercise of the rights of the data subject, please contact GADOT BELGIUM BV by sending an e-mail to [stephanie.heyman@gadot.com](mailto:stephanie.heyman@gadot.com).

We will respond to questions or comments within 30 days.

#### **Complaints to a data protection supervisor**

If you believe that the processing of your Personal Data is in breach of the GDPR, you have the right to lodge a complaint with the Supervisory Authority: the Belgian Data Protection Authority <https://www.dataprotectionauthority.be/>.

#### **Revisions to this Privacy Statement**

GADOT BELGIUM BV may update this Privacy Statement from time to time to reflect changes in GADOT BELGIUM BV practices regarding the processing and protection of Personal Data or to comply with laws and regulations. GADOT BELGIUM BV recommends that you review this Privacy Statement regularly as well as when you choose to provide Personal Data to GADOT BELGIUM BV.

Candidates can find the current version on our website. If GADOT BELGIUM BV intends to process your data for purposes other than those for which they were collected, it will inform the Candidates in advance, in accordance with legal provisions.

Last update: July 2021